

# Appendix A

## *Environmental Assessment*

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### Chapter 1—Purpose of and Need for Action

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This environmental assessment (EA) documents the purpose of and the issues, alternatives, and analysis for the Sangre de Cristo Conservation Area (SCCA). This conservation area grew out of initial planning for the San Luis Valley Conservation Area (SLVCA), that represents a broader vision for the headwaters of the Rio Grande. Planning for that conservation area will continue as the Service works to find more specific goals for the SLVCA as it relates to the existing national wildlife refuges in the San Luis Valley. The Service is moving forward to establish the SCCA within the original SLVCA boundary. The SCCA will be located largely in southern Colorado, but a small part will be in northern New Mexico. See the LPP for background information and descriptions on the conditions that led to the U.S. Fish and Wildlife Service (Service or USFWS) proposal to create the SCCA for the protection of important wetland and upland habitats, primarily through conservation easements with willing landowners.

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#### Introduction

The SCCA is a landscape-level strategic habitat conservation initiative within the Southern Rockies Landscape Conservation Cooperative. The SCCA is in the headwaters of the Rio Grande in the southeastern corner of the San Luis Valley. The San Luis Valley is a large intermountain valley bounded by the San Juan and Sangre de Cristo mountain ranges, whose rain shadows create high desert conditions in the region. However, the complex hydrology of the valley, as well as the snowmelt runoff from the mountains, have created a variety of dynamic wetlands and riparian corridors on the mountain slopes and valley floor. These wetland areas support a diverse assemblage of plants and wildlife, including habitat for many trust species such as the southwestern willow flycatcher, western snowy plover, many species of migrating and nesting waterfowl, and 95 percent of the Rocky Mountain population of greater sandhill crane. The mountains themselves are also ecologically important, providing

habitat for imperiled species such as Canada lynx and Mexican spotted owl, as well as serving as migration corridors for wildlife in this southernmost extension of the Rocky Mountains.

Anthropogenic practices including agriculture, changes in fire regime, and climate change have changed the historical vegetation of the San Luis Valley. Low human population density associated with the largely agricultural economy of the valley have resulted in the San Luis Valley and central Sangre de Cristo Mountains keeping substantial parts of their biological value, particularly for migratory birds. However, rising agricultural costs, including those resulting from the recent State of Colorado requirement to augment surface flows to offset the impacts of ground water use, have led to an unsettled agricultural economy. The risk of second home development of the already heavily subdivided Costilla County continues, and would substantially reduce the quality of that habitat for sagebrush-dependent species. Substantial residential development or unsustainable logging practices in the Sangre de Cristo's would also degrade that habitat for the species discussed before. Through the SCCA, the Service hopes to protect a large part of the wildlife habitat in the region from such degradation.

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#### Proposed Action

The Service is moving to create the one-million-acre SCCA to conserve vital wildlife habitats and migration corridors through voluntary conservation easements. The SCCA acquisitions will focus on the protection of riparian corridors, wetlands, sagebrush, and montane forests in the valley through the purchase of up to 250,000 acres of conservation easements. The lands protected via easement would remain in private ownership. These lands could continue to be grazed, hayed, farmed, or otherwise managed in accordance with current practices. However, subdivision and development would be restricted, subject to stipulations agreed-upon by the landowner and the Service.

Furthermore, some easements may include stipulations that the exercise of water rights associated with these lands could be changed only if the proposed changes would be beneficial to wildlife.

Unlike some other conservation areas of the National Wildlife Refuge System, in which objectives and the setting of priorities are largely based on modeling for one species or a guild of species, the SCCA is intended to meet all the objectives of a complex geographic, ecological, and political environment. It therefore has a diverse range of goals:

- conserve, restore, enhance, and protect wetland and riparian habitat, an important breeding and foraging resource in the high mountain desert for migratory shorebirds, waterfowl, and neotropical passerine birds
- support the recovery and protection of threatened and endangered species that occur in the SCCA, and reduce the likelihood of future listings under the Endangered Species Act by prioritizing key habitat for listed species and species that are candidates for listing
- protect the integrity of these habitats by preventing fragmentation and conversion of native vegetation
- conserve working landscapes based on ranching and farming activities that support a viable agricultural industry
- promote ecological resiliency and adaptive capacity by connecting together the existing network of public and private conservation lands

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## Decisions to Be Made

Based on the analysis provided in this final EA, the Regional Director of the Service will make two decisions:

1. Figure out if the Service should establish the SCCA, in accordance with its land protection planning policy.
2. If yes, figure out if the selected alternative will have a significant impact on the quality of the human environment. This decision is required by the National Environmental Policy Act (NEPA). If the quality of the human environment would not be affected, a “finding of no significant impact” will be signed and will be made available to the public. If the preferred alternative would have a significant impact, an environmental impact statement will be prepared to further address those impacts.

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## Issues Identified and Selected for Analysis

Please see a description of issues identified and selected for analysis in chapter 1 of the land protection plan in this volume.

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## Related Actions and Activities

Please see a description of related actions and activities in chapter 1 of the land protection plan in this volume:

## Chapter 2—Alternatives

This chapter describes the two alternatives identified for this project:

- no-action alternative
- proposed action, giving the Service the authority to create the SCCA

These alternatives were developed according to NEPA §102(2)(E) requirements to “study, develop, and describe proper alternatives to recommend courses of action in any proposal that involves unresolved conflicts concerning alternatives uses of available resources.” The alternatives consider the effects of a conservation easement program with limited fee-title acquisition within the project area boundary identified in this EA.

In addition, alternatives that were dropped from detailed study are briefly discussed.

### Alternative A (No Action)

Under the no-action alternative, the areas outside of existing protected areas would largely remain in private ownership and subject to changes in land use or habitat type. Some added protection is likely because of ongoing conservation easement initiatives in the San Luis Valley by public entities such as the NRCS and nongovernmental organizations such as the Colorado Cattleman’s Agricultural Land Trust and Colorado Open Lands.

### Alternative B (Preferred Alternative)

Under the preferred alternative, the Service will establish the SCCA in southern Colorado and northern New Mexico. The project boundary encompasses approximately one million acres. Within this boundary, the Service would strategically acquire from willing sellers perpetual conservation easements on up to 250,000 acres through purchase or donation. The Service would also consider accepting fee-title donations, but does not plan to buy lands in fee title.

Conservation easements are both a cost-effective and politically effective means of land protection. They stem from the “bundle of rights” concept of land ownership (Merenlender et al. 2004), wherein, like severed surface and mineral rights for a given parcel, a part of the land title is severed and transferred to a land trust or public agency for conservation purposes.

They are quite popular for a variety of reasons. Because they allow the property owner to continue using the land, subject to agreed-upon stipulations, they protect working landscapes, which is a priority of the America’s Great Outdoors initiative. Perpetual conservation easements provide a one-time source of income to the seller or a tax incentive to the donor, and can even be an estate planning tool (Engel 2007). In many cases, they can meet the conservation objectives of the Service without our incurring the costs associated with managing fee-title land; furthermore, the land remains on the county tax rolls. In the SCCA, the Service seeks to protect up to 250,000 acres through conservation easements.

Potential easements will be ranked based on wildlife needs in the project area, which include areas of wetland, riparian, montane forest, and upland habitats. See the LPP in this volume for detailed descriptions of these priorities.

### Alternatives Considered but Dropped from Further Analysis

#### VOLUNTARY LANDOWNER ZONING OR COUNTY ZONING

Under this alternative, landowners would voluntarily petition their county commissioners to create a zoning district to direct the types of development that can occur in an area. An example of citizen-initiated zoning is when landowners would petition the county government to zone an area as agricultural, precluding certain types of nonagricultural development, such as residential subdivision or construction of a solar energy facility. However, zoning decisions are easily changed and thus do not ensure perpetual habitat protection. Also, agricultural zoning would be inadequate because water has become an increasingly expensive and limiting resource and it thus would not in itself stop continued conversion from flood-irrigated vegetation to less biologically diverse cultivated crops. This conversion has often been accompanied by the replacement of flood irrigation practices with center-pivot irrigation. Although center-pivot irrigation offers onsite water efficiency, it results in land cover that is far less suitable to wildlife than native vegetation or even flood-irrigated agriculture. Because of these reasons, this alternative was not investigated further.

## **MANAGEMENT BY OTHERS**

Some governmental and nongovernmental organizations are active in promoting conservation within the SCCA and the broader San Luis Valley region. Current land managers include the Colorado Parks and Wildlife, the Colorado State Land Board, the BLM, the NPS, the USFS, and the Service. Additional land is conserved in fee title by The Nature Conservancy, and conservation easements are held by Ducks Unlimited, Rio Grande Headwaters Trust, the NRCS, and the Colorado Parks and Wildlife, among others. There are active conservation initiatives underway by these organizations, but none has the scope necessary to achieve the conservation objectives of the SCCA, nor do other organizations have the same wildlife habitat objectives.

## **FEE-TITLE ACQUISITION**

Much of the publicly owned land mentioned in the previous section has been managed for conservation purposes for decades; indeed, Great Sand Dunes National Park and Preserve was originally established in 1932 as a National Monument. Fee-title ownership allows the strongest protection for the habitat and allows the greatest flexibility for adaptive management in response to new data or changing conditions. However, acquisition of new public land on the scale of the SCCA is politically untenable and, given the low appropriation of Land and Water Conservation Fund monies, it is also financially unrealistic. For these reasons as well as the expense of managing more public lands, it is the Service's policy to acquire the minimum interest necessary to reach conservation objectives.

## Chapter 3—Affected Environment

Please see a discussion of the resources and affected environment in chapter 2 of the LPP in this volume.

## Chapter 4—Environmental Consequences

For alternatives A and B described earlier, the following narrative documents the analysis of environmental effects expected to occur from carrying out each of the alternatives.

### Effects on the Physical Environment

The estimated effects of each alternative on mineral, soil, and water resources, and on the Service's ability to address climate change, are described below.

#### ALTERNATIVE A (NO ACTION)

Development and associated habitat loss could continue on lands outside of existing protected areas; in riparian areas, development may cause erosion and sedimentation that ultimately could adversely affect aquatic species like the Rio Grande cutthroat trout. Further land protection would be limited to the efforts of other agencies and organizations. The Service's role would be limited to programs such as Partners for Fish and Wildlife; no Land and Water Conservation Fund monies would be expended in the project area by the Service for further land protection outside of the immediate vicinity of existing refuge units. Important water-dependent wildlife habitat would remain vulnerable to reallocation of surface water offsite or changes to how existing water rights are exercised.

#### ALTERNATIVE B (PREFERRED ALTERNATIVE)

The implementation of the goals of the SCCA will primarily support current land use practices, and is therefore unlikely to substantially affect soil resources in the valley. There may be some reduction in erosion and sedimentation because of the prevention of subdivision and development. The SCCA wouldn't supersede existing third party mineral rights, and the program is therefore unlikely to affect mineral resources. If the mineral estate has not been severed, the easement may include restrictions on surface occupancy, but the Service would not, and cannot, prevent a mineral owner from accessing their minerals. The Service is

unlikely to pursue acquisition of interests in lands with outstanding surface mineral leases or rights because the associated destruction of surface vegetation and need for reclamation would diminish the wildlife value of such land. In some circumstances, habitat that depends on continuation of current water use practices would be protected from degradation caused by the sale of surface water rights or substantial changes to water use.

### Effects on the Biological Environment

This section describes the likely effects of the project on species and their habitats.

#### ALTERNATIVE A (NO ACTION)

The Service's Partners for Fish and Wildlife Program would remain active within the project area, where it works cooperatively with landowners to voluntarily improve habitat on private land. Habitats would continue to be protected because of the ongoing efforts of agency partners and nongovernmental organizations, primarily through easements paid for by private donations, the NRCS Wetland Reserve Program (WRP), and North American Wetlands Conservation Act (NAWCA) grants. These efforts are laudable and have conserved valuable habitat, particularly wetlands. However, they tend to underrepresent nonwetland riparian forest and uplands such as sagebrush steppe, both of which are particularly important for federally listed species and candidates for listing in the project area. Further, the demand for both NAWCA and WRP money is much higher than for historically available money. Also, unlike a Land and Water Conservation Fund easement program, NAWCA requires matching funds, which may or may not be available. Therefore, there would likely continue to be erosion of habitat quality and a decrease in ecological resiliency because of land cover changes and associated fragmentation, introduction of exotic species, and construction of

structures that are incompatible with habitat use by some wildlife.

Outright habitat loss because of conversion of land to other uses is perhaps the most obvious threat to wildlife in most areas. In the SCCA, this can take the form of conversion from natural to agricultural land cover, changes to irrigation regimes, and development of land for commercial or residential use. This habitat destruction, along with construction of associated infrastructure such as water diversion structures, can result in the fragmentation of habitat. The effects of fragmentation on wildlife have been intensively studied in ecology and wildlife biology (for a conceptual review, see Collinge 2009).

Both the loss and fragmentation of riparian habitat are real concerns in the SCCA. Riparian areas are necessary for the maintenance of medium and large mammal diversity in agricultural landscapes (for example, Hilty and Merenlender 2004), and for both breeding and stopover habitat for neotropical migratory songbirds in human-altered landscapes (Pennington, Hansel, and Blair 2008). Riparian areas provide nest habitat for the threatened southwestern willow flycatcher and the candidate yellow-billed cuckoo, and the slow but continued loss of this habitat under alternative A would have an impact not just on regional species diversity, but also on the potential persistence of imperiled species.

Besides providing habitat in and of themselves, riparian areas also serve as corridors for animal movement. Facilitating animal movement across complex mosaic landscapes is essential in a time of global environmental change. One of the greatest ecological threats of climate change is that species and varieties that are adapted to specific environmental conditions may die out because they are isolated from habitats that may have those conditions in the future (Loss et al. 2011). Under alternative A, there is continued risk of development in riparian corridors that were contiguous before, as well as in unprotected areas along the Sangre de Cristo Mountains in Costilla County, Colorado, and northern Taos County, New Mexico, which could endanger the future existence of populations and species under future climate conditions. The latter area is also habitat for the Canada lynx, which is federally listed as threatened. Development of that region, which could occur under alternative A, may isolate lynx in the southern Sangre de Cristos from those in the rest of the Rocky Mountains.

### **ALTERNATIVE B (PREFERRED ALTERNATIVE)**

Establishment of the SCCA will enable the Service to permanently protect up to 250,000 acres of vital wildlife habitat in the San Luis Valley and Sangre de Cristo Mountains. While there are conservation initiatives by other government agencies and private land trusts underway in the project area, the SCCA

specifically targets habitat that is necessary for migration or breeding of Federal trust species, namely migratory birds and a handful of federally listed and candidate nonbird species. The conservation area should complement and enhance the ecological benefits of existing public and private conservation lands and habitat improvement programs by capturing habitats not included in these programs and by helping to link together the existing protected area.

The use of easements to protect and buffer riparian habitats under alternative B will benefit both obligate riparian species like the southwest willow flycatcher, bats like the Yuma myotis, and species that simply use the riparian areas as corridors to move from point to point, like bobcat and black bear. Of particular interest are the willow and cottonwood riparian forests along the tributaries of the Rio Grande, which are used by dozens of species of migratory songbirds. In the rivers and tributaries themselves, the use of easements could support conditions suitable for imperiled fish such as the Rio Grande cutthroat trout, Rio Grande chub, and Rio Grande sucker by preventing development of houses and roads, which can cause siltation and changes in water chemistry and temperature. Easements would also prevent conversion of shrub steppe near riparian areas to cropland, which can lead to increases in sediment, nitrogen loads, and temperatures in associated streams.

The presence of mesic [wet] habitats in the midst of a high-mountain desert provides an irreplaceable resource to regional, and in some cases continental, populations of breeding and migrating shorebirds, wading birds, and waterfowl. Water costs in the San Luis Valley are increasing because of restrictions on the use of ground water, and water is likely to become an increasingly complex issue because of projected changes in runoff timing and uncertainty about future precipitation trends (Ray et al. 2008). This may encourage landowners who have quality wetlands to change how they exercise their water rights, to the detriment of species that use those wetlands. On some properties with such water-dependent habitat, the easements may include language restricting changes to existing beneficial uses of water, meaning that willing sellers would agree to support practices that are of value to wildlife. For example, water could not be sold off of the property where water rights were being exercised when the easement was bought unless the new use was deemed more beneficial to wildlife. Many of these wetlands would not exist now without current land use practices.

Sagebrush shrubland and steppe are not widespread in the project area, but are found in a ring above the desert scrubland and below the pinyon-juniper woodland in the far northern, southeast, and southwest parts of the valley. Much of this land is managed by the BLM. The largest areas of this vegetation in the

region are in Costilla County, Colorado, and these areas are almost entirely privately owned and not under conservation easements. Colorado Parks and Wildlife has identified that area as potential but unoccupied habitat for the Endangered Species Act candidate Gunnison sage-grouse. Sage-grouse, as well as other sagebrush obligates, are particularly sensitive to disturbance, especially the construction of vertical structures in their habitat, which could happen if homes and associated power lines were constructed. Much of that area has been subdivided into small parcels, but little real development has occurred to date outside of small towns and cities. Given those factors, and the lack of attention being given to that habitat type by conservation partners now, land protection under alternative B is likely to play an important role in preventing modification of this important ecosystem. It is unknown if there will be future attempts to reintroduce Gunnison sage-grouse to that area, but certainly it would be unlikely to happen if the existing habitat were altered.

As discussed under alternative A, there are large unprotected areas along the spine of the Sangre de Cristo Mountains in Costilla County, Colorado, extending into Taos County, New Mexico. Alternative B will allow the Service to use its acquisition authority to complement efforts by private land trusts to protect this important wildlife corridor and Canada lynx habitat.

## Effects on Cultural Resources

The estimated effects of each alternative on cultural resources are described below.

### ALTERNATIVE A (NO ACTION)

Some cultural resources could be adversely affected by activities such as development and road construction on lands outside of existing public and private conservation lands. While the rate of development is not rapid now, the San Luis Valley is rich with millennia of human history, and much of the valley's history is poorly documented. There are legitimate concerns that important sites may be destroyed or irreparably disturbed in the absence of protection.

### ALTERNATIVE B (PREFERRED ALTERNATIVE)

There is the potential for greater protection of cultural resources than under alternative A because the easement terms that prevent development of land in ways that could adversely affect wildlife could also prevent destruction of Native American, Hispano, and other historic American sites.

## Effects on the Socioeconomic Environment

This section describes the estimated effects of the alternatives on land use, ecosystem services, land ownership, and the regional economy.

### ALTERNATIVE A (NO ACTION)

Landownership patterns will continue to change in accordance with market forces, as will resulting modification of ecosystem services and changes in cost of public service delivery by local government. Landowner compensation through conservation easements would remain available through other Federal programs and the efforts of nongovernmental organizations.

### ALTERNATIVE B (PREFERRED ALTERNATIVE)

#### Social and Economic Impacts of Conservation Easements

Conservation easements provide public benefits for local residents, communities, and governments. Easements and fee-title acquisitions also reshape future development patterns, affect property values, and inject new money into local communities. There are many dynamic variables at play when considering the social and economic effects of conservation easements, especially given that potential purchases may span decades. Because of future uncertainty surrounding such factors as the likelihood and timing of easements; the availability of Service money to buy lands; and population growth, land values, and agricultural commodity prices, the social and economic impacts of the easements cannot be quantified in this analysis. However, these impacts can be described qualitatively. This analysis discusses the following effects of conservation easements in the SCCA:

- conservation values in the region
- benefits to local communities
- landowner compensation
- effects to local government net revenue

Table A, located at the end of this section, provides a summary of the social and economic impacts of conservation easements and fee-title acquisitions in the SCCA.

**Conservation Value.** Conservation easements can protect values associated with biodiversity and wildlife abundance, keep aesthetic beauty, and protect social and culturally significant features of landscapes and livelihoods (Millennium Ecosystem Service Assessment 2005, Ehrlich and Ehrlich 1992, Daily 1997). Ecosystem services, such as water purification, oxygen production, pollination, and waste breakdown,

are also supported for local residents through land preservation (Millennium Ecosystem Service Assessment 2005). The primary public benefit of Service conservation easements is enhanced and preserved wildlife habitat. As development stressors increase over time, many key off-refuge habitat areas may become less available because of conversion to non-wildlife habitat uses. Habitat preservation has been shown to stabilize and increase wildlife populations (Reynolds and others 2001). Conservation easements on private lands strengthen the resiliency of species habitat and provide opportunities for wildlife movement and adaptation for years to come.

**Benefits to Local Communities.** Although local residents may not be able to explicitly use or access land protected by conservation easements, protected lands act as a buffer that benefits residents through increased biodiversity, recreational quality, and hunting opportunities on publicly accessible wildlife refuges and on some private lands (Rissman et al. 2007). It is well documented that open space carries positive values to local residents and communities, as well as to passersby (McConnell and Walls 2005). This is evidenced by the success of open space preservation ballot initiatives at the local, county, and State levels. Banzhaf et al. (2006) point out that between 1997 and 2004, more than 75 percent of the more than 1,100 referenda on open space conservation that appeared on ballots across the United States passed, most by a wide margin.

It is also well documented that open space and protected natural areas can increase surrounding property values (see McConnell and Walls 2005 for a comprehensive review). The reciprocating value of open space on property values will vary depending on landscape characteristics and location attributes (for example, distance to the conserved area) (Kroger 2008). The permanence of the open space is also an influencing factor. Typically, open space that is permanently protected (such as refuge lands and lands protected with perpetual conservation easements) will generate a higher enhancement value to local properties than land that has the potential for future development (Geoghegan et al. 2003). Location and demographic factors in the region can also influence the relative level of property enhancement value. For instance, open space may generate larger amenity premiums for property in more urbanized areas and where median incomes are higher (Netusil et al. 2000), which isn't to say there isn't the chance for property values to increase substantially in rural areas as well (Vrooman 1978, Phillips 2000, Crompton 2001, Thorsnes 2002).

Conservation easements would also inject new money into the local economy. The sale of conservation easements provides landowners with more revenue. Some percentage of this money may be spent in the

local economy, including purchasing new real estate, consumer goods, or services in the local area. Conservation easements may also help keep the character of a region by protecting a traditional and historical way of life and the associated working landscape. Land with historical commercial use, such as ranching, forestry, and farming, is often compatible with or beneficial to wildlife refuge objectives (Jordan et al. 2007, Rissman et al. 2007). Conservation easements provide financial benefits for landowners that may enable them to preserve the natural and historical value of their farm, ranch, and open space lands, and to pass this legacy on to their children and grandchildren. In addition to supporting a cultural heritage, the preservation of farming and ranching operations can result in economic benefits to the local economy. Farmers' costs for equipment, supplies, and materials may be spent in the local economy, thus stimulating local businesses and supporting local employment. Farm workers will also spend their salaries in the local economy, thus supporting further local employment. Conservation easements may also result in increased recreation-related spending by visitors.

**Landowner Compensation.** The Service will buy conservation easements from willing sellers at fair market value. The fair market value of a conservation easement is found through an appraisal process. An appraiser estimates how much the land would sell for unencumbered by the conservation easement (the "before" value) and how much the land would sell for with the conservation easement in place (the "after" value). The value of the conservation easement is equal to the before value minus the after value, or the difference in the fair market value of the property with and without the easement. Landowners may also choose to donate conservation easements to the Service. The donation of a conservation easement may qualify as a tax-deductible charitable donation, which may result in Federal income tax benefits. The sale of a conservation easement for less than its fair market value (called a "bargain sale") may also qualify for tax deductions. Landowners may be able to claim a charitable income tax donation equal to the difference between the fair market value and the bargain sale price of their easement. Income from the sale of a conservation easement may be taxable. Please note that the Service does not give tax advice. Landowners considering entering into a conservation agreement with the Service should consult a tax advisor or attorney for advice on how a conservation easement would affect their taxes and estate.

Conservation easements reduce the value of the encumbered property. A conservation easement will reduce the fair market value of an estate because the easement permanently removes some of the estate's development potential. The reduction in value depends

on the potential development value of the land and the level of restriction agreed-upon in the easement. In general, an easement on land located in an area with high development pressure will have a greater effect on the value of the land than an easement on land located in an area with low development pressure, and an easement that is more restrictive will have a greater effect on the value of the land than an easement that is less restrictive. The Service will buy easements at their appraised fair market value; therefore, easements on lands with high development pressure will receive higher payments.

**Effects on Local Government Net Revenue.** The effects of conservation easements on the net revenue of local government are complex and speculative; many variables are at play, and realizing the effects often requires time. Local governments collect revenue through intergovernmental transfers, property taxes, sales taxes, personal income taxes, and other charges, such as permitting. These revenues are then spent to provide community services such as fire and police services, schools, infrastructure, and public spaces. Conservation easements affect the location of future development, and therefore affect both future revenues and costs for local governments. The following sections describe the possible effects to local government revenues and costs. Overall, the SCCA conservation easement program is expected to have negligible effects on local government net revenues (revenues minus costs).

*Effects on Local Government Revenues.* Property taxes constitute the largest source of local governments' own revenue (Urban Institute and Brookings Institution 2008), and are not expected to be substantially affected by conservation easements in the SCCA. Property taxes are assessed based on the value of property. For most types of properties, county assessors use fair market value to find property tax liabilities; however, agricultural land is often assessed differently. In many States, the assessed value of agricultural land is found based on the productive value of the land rather than on the fair market value of the property. The fair market value of land is the amount that a property is estimated to sell for. This value includes both the productive value of the land and any speculative value associated with the possibility of developing the land. Conservation easements reduce the fair market value of property by removing the speculative value associated with possible development; however, conservation easements generally do not affect the productive value of agricultural land.

The SCCA will include land in two States: Colorado and New Mexico. In both States, property taxes for agricultural land are assessed based on the productive

value of the land or farm income<sup>1</sup> (Colorado Division of Property Taxation 2006; New Mexico Taxation and Revenue Department 2011). In the SCCA, most properties that will enter into conservation easement agreements with the Service will be classified as agricultural land; thus, there will be little effect on the current property tax base for the nine-county area. Some of the lands in the SCCA that will enter into easements are now fallow and do not classify as agricultural lands. For these properties, assessors may assess the fair market value of the land based only on the uses allowed by the easement. This could result in a small reduction in property tax revenue in some counties within the region. The reduction in property taxes will be dependent on the percent of easement acres that are bought on fallow land (versus agricultural land), and on the reduction in the market value of the fallow lands.

The donation of any fee-title lands will reduce the amount of property tax revenue collected by local governments because the Service is exempt from taxation on its property holdings. Under Federal fee-title ownership, counties would qualify for reimbursement of some property tax revenue foregone under the Refuge Revenue Sharing Act of 1935, which allows the Service to make annual payments to local governments in areas where fee-title purchases have removed land from the tax rolls. Under provisions of the Refuge Revenue Sharing Act, local counties receive an annual payment for lands that have been bought by full fee-title acquisition by the Service. Payments are based on the greater of 75 cents per acre or 0.75 percent of the fair market value. The exact amount of the annual payment depends on Congressional appropriations, which in recent years have tended to be substantially less than the amount required to fulfill the authorized level of payments. In fiscal year 2010, actual Refuge Revenue Sharing payments were 22 percent of authorized levels.

Local government revenue associated with personal income is expected to remain relatively constant within the nine-county area. Conservation easements and fee-title acquisitions in the SCCA would affect the location and distribution of development, but are not expected to change the rate or density of human population growth. Redistribution of population growth could affect the distribution of personal-income-related revenues across the counties, but is expected to have little effect on total revenues within the nine-county area. There would be a one-time increase in landowner income as the Service buys the easements.

*Effects on Local Government Costs.* Land protection through conservation easements could result in a reduction in future expenditures for local governments

<sup>1</sup>Special rules and statutes apply in each State to figure out if land in agricultural production and land in conservation easements is eligible to be assessed as agricultural land

and municipalities. New residential developments require local governments to provide services such as fire protection, police services, and schools, and to construct new infrastructure such as roads, parks, and water and electric-delivery systems. The costs to provide government services for new residential developments often exceed new revenues derived from the developments. This is especially true for rural residences, which tend to have higher costs for county governments and school districts than urban residences. In 2001, the American Farmland Trust found that, on average, the cost to provide community services to new residential developments was \$1.15 for every \$1.00 of revenue generated by those developments (American Farmland Trust, 2001; Coupal et al. 2002). A study conducted in Wyoming found that community service costs averaged \$2.01 for every \$1.00 of revenue for rural residential lands; in contrast, the average cost to provide services for lands under agricultural production averaged \$0.54 for every \$1.00 of revenue (Taylor and Coupal 2000).

**Impacts to Federal permitting and property rights of non-participants.** Neither the authorization nor the establishment of the SCCA would affect the administration of lands by other Federal agencies; the SCCA boundary is simply an acquisition boundary within which the Service could acquire easements or property. Landowners who choose to take part in the program would sell or donate certain property rights to the Service. There would be no impact on adjacent property owners. Traditional land use rights awarded to certain residents of the former Sangre de Cristo land grant would not be affected by sale or donation of easements on those properties, as those property rights have been found by the Colorado Supreme Court to not belong to the landowner; therefore, they are not available for sale to the Service.

## Unavoidable Adverse Impacts

This section describes adverse effects which may be unavoidable when carrying out alternatives A and B.

### ALTERNATIVE A (NO ACTION)

Loss of wetland, riparian, and upland vegetation and their associated habitat values would continue because of development of areas outside of those protected by partner agencies and land trusts.

### ALTERNATIVE B (PREFERRED ALTERNATIVE)

No direct or indirect unavoidable adverse impacts to the environment would result from choosing alternative B. An easement program would not result in

adverse impacts on the physical or biological environment. Choosing an approved boundary for the SCCA and concurrent authorization to go forward with an easement program would not, by itself, affect land ownership or value, or other aspects of the socioeconomic environment.

## Irreversible and Irretrievable Commitment of Resources

Any commitments of resources that may be irreversible or irretrievable because of carrying out alternatives A or B are described below.

### ALTERNATIVE A (NO ACTION)

There would be no commitment of resources by the Service if alternative A were selected. The Service could still exercise its authority to acquire inholdings or for minor expansions of existing refuges, but would not be obligated to do so.

### ALTERNATIVE B (PREFERRED ALTERNATIVE)

The establishment of the SCCA would not, of itself, constitute an irreversible or irretrievable commitment of resources. However, if interests in land were acquired through the use of Land and Water Conservation Fund or donations, the administration of the easement provisions or donated property would require an irreversible and irretrievable commitment of resources. Checking easements would represent a minor increase in overall Service costs borne by the San Luis Valley National Wildlife Refuge Complex.

## Short-Term versus Long-Term Productivity

Following is a discussion of short- and long-term effects.

### ALTERNATIVE A (NO ACTION)

Continued efforts to conserve habitats would be ongoing through the efforts of Service activities like Partners for Fish and Wildlife and the efforts of other agency and nonprofit partners. Important wetland and upland habitats would be expected to continue to be lost at current rates of conversion, which would have long-term negative implications on the maintenance of the ecological communities they support.

### ALTERNATIVE B (PREFERRED ALTERNATIVE)

The Service would be authorized to buy perpetual easements only from willing sellers, providing an

immediate short-term economic benefit to landowners. This may provide capital for expansion of agricultural operations, or simply allow struggling operators to stay in business. This is particularly relevant given the changes to Colorado water law, which now requires ground water users to buy increasingly expensive surface water to decrease their impact on senior surface water users. This infusion of capital at an opportune time would likely have important long-term benefits to the economy of the San Luis Valley. The conservation of habitats under this program would also have important short- and long-term ecological benefits. The program will preserve habitat now used by wildlife, including federally protected species. This will result in the preservation of the area's biodiversity, which is important for long-term ecosystem stability and function in arid environments (Maestre et al. 2012). By preventing fragmentation, particularly in wildlife corridors like riparian areas and along the Sangre de Cristo Mountains, the program will promote long-term ecological resiliency to habitat perturbations such as large wildfires and climate change.

## Cumulative Impacts

As defined by NEPA regulations, a cumulative impact on the environment “results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions” (40 CFR 1508.7). The following describes the past, present, and reasonably foreseeable actions related to the proposed SCCA. A discussion follows about the cumulative impacts of these actions in combination with the actions of alternatives A and B.

### PAST, PRESENT, AND REASONABLY FORESEEABLE FUTURE ACTIONS

Some private and public organizations have successfully conducted land protection programs in the San Luis Valley through negotiation of conservation easements with willing landowners. One specific example is a coalition of local governments, landowners, and nonprofit organizations that is working to conserve land as part of their mitigation strategy in the draft San Luis Valley Habitat Conservation Plan that was released in June of 2012. The Service assumes this will likely continue in the future.

The State of Colorado is carrying out new laws about ground water augmentation, wherein landowners who use ground water for irrigation will have to buy surface water rights to offset any adverse impacts on downstream users.

There is ongoing interest in the San Luis Valley for renewable energy development. There are small-scale

commercial solar facilities now deployed in the San Luis Valley, and the Department of Energy and the BLM are studying the impacts of more facilities being developed on public land (BLM and DOE 2010). The BLM is now reviewing the potential impacts of expanded geothermal leasing on public lands in the San Luis Valley (BLM 2012). The potential for increased energy production, and the desire for redundancy in the electrical transmission system in the San Luis Valley has led to planning for the construction of a high-capacity transmission corridor through the valley, crossing the Sangre de Cristo Mountains at La Veta Pass.

### ALTERNATIVE A (NO ACTION)

Under this alternative, there would be no cumulative impacts on the environment because the Service would not undertake any more land protection measures.

### ALTERNATIVE B (PROPOSED ACTION)

The continuing land protection efforts of others, combined with the proposed action, may have nonlinear, positive effects on wildlife populations. Because this alternative would focus on federally regulated species (such as priority migratory bird species and species listed or being considered for listing under the Endangered Species Act), implementation would result in accelerated protection of habitats for those species. Service seeks to coordinate its land protection efforts by promoting active communication with our conservation partners on land protection opportunities as they arise so that the organization whose program is most proper can seek the acquisition of a particular land interest. The public and private conservation entities in the San Luis Valley have a longstanding friendly relationship and view each other's conservation objectives as largely complementary. However, there are specific instances where potential conflict could arise without this communication, such as riparian habitat of the southwestern willow flycatcher. The Service's does not intend to compromise the ability of local government to meet their mitigation targets in the San Luis Valley Habitat Conservation Plan. To this end, the Service would not undertake any acquisition of southwestern willow flycatcher habitats along the Rio Grande or its tributaries without discussing the opportunity with our conservation partners. The Service would defer to partners in all instances where they need to seek an interest in the land first.

The impacts of new Colorado water law on water availability and cost may be cumulative with the impacts of the Service's easements, which, depending upon the habitat present on a specific property, may include language restricting the sale of surface water rights from lands protected under this program. Because the easements would keep current water use

practices on lands where an interest is acquired, these impacts are unlikely to be significant.

The presence of a Service interest in land could preclude construction of commercial energy production or transmission infrastructure on that property if such activity is deemed to be incompatible with the purpose of the SCCA. This would result in unknown effects because of potentially limiting where such facilities could be sited, but the impacts of such limitations on economics and the attainment State and Federal

renewable energy requirements would be speculative at best, and are outside of the scope of this analysis.

Any impacts of the proposed action that are cumulative with the actions of others will largely be decided by 1) the number of landowners willing to enter into easement agreements with the Service and 2) the amount of money available for acquisition of these easements.

**Table A. Social and economic impacts of conservation easements and fee-title acquisitions.**

<i>Issue</i>	<i>Social and economic impacts</i>	
	<i>Conservation easements</i>	<i>Fee-title acquisitions</i>
Conservation value	<ul style="list-style-type: none"> <li>■ Migration corridors and habitat for deer, elk, moose, and migratory birds will be preserved.</li> </ul>	<ul style="list-style-type: none"> <li>■ Same as for easements plus the conservation value of fee-title lands may be greater than easement lands because the Service would have the ability to increase conservation value through projects on the land.</li> </ul>
Affects to local communities	<ul style="list-style-type: none"> <li>■ The public will enjoy increased biodiversity, recreational quality, and hunting opportunities on nearby publicly accessible refuges and some private lands.</li> <li>■ Neighboring property values may increase.</li> <li>■ Positive economic impacts may result from new landowner money injected into the local economy.</li> <li>■ Traditional and historical ranching and farming landscapes will be preserved.</li> </ul>	<ul style="list-style-type: none"> <li>■ Same as for easements except traditional and historical ranching and farming landscapes may not be preserved.</li> <li>■ Positive economic impacts may also result from increased Service habitat improvement expenditures injected into the local economy.</li> <li>■ Possible increase in refuge visitation and associated impacts of visitor spending in the local economy. However, neighbors and other public may be affected by increased accesses to refuge lands.</li> </ul>
Landowner compensation	<ul style="list-style-type: none"> <li>■ Landowners will be compensated for the fair market value of the easement.</li> <li>■ Easements will reduce the fair market value of the encumbered property.</li> <li>■ Landowners keep most use rights, but forfeit their right to develop or subdivide the land. Other possible restrictions include development of vertical structures, diversion or sale of water rights.</li> </ul>	<ul style="list-style-type: none"> <li>■ Landowners will be compensated for the fair market value of the land.</li> <li>■ Landowners forfeit all rights of ownership and turn the property over to the Service.</li> </ul>
Affects on local government net revenue	<ul style="list-style-type: none"> <li>■ No changes to property tax revenues are expected for agricultural lands.</li> <li>■ Property tax revenues from fallow lands will decrease.</li> <li>■ Other government revenues, such as personal income tax, may be redistributed throughout the region.</li> <li>■ Land protection through conservation easements could result in reduced future service costs for local governments and municipalities.</li> </ul>	<ul style="list-style-type: none"> <li>■ The Service does not pay property taxes on land they own; thus, county tax revenue would decline.</li> <li>■ Lost property tax revenues are partially replaced with Refuge Revenue Sharing payments.</li> </ul>

## Chapter 5—Coordination and Environmental Review

This chapter describes how the Service coordinated with others and conducted environmental reviews of various aspects of the project proposal and analysis. Additional coordination and review would be needed to carry out the proposed action, if selected.

### Agency Coordination

The Service has discussed the proposed establishment of the SCCA with other Federal (USFS, National Park Service, BLM, NRCS), State of Colorado (Colorado Parks and Wildlife, Colorado Water Conservation Board), local county governments, and regional entities (Rio Grande Water Conservation District) through a series of meetings and correspondence. Tribes with an aboriginal interest in the San Luis Valley and surrounding mountains (Pueblo of Picuris, Cochiti Pueblo, Jemez Pueblo, Jicarilla Apache Nation, Navajo Nation, San Juan Pueblo, Pueblo of Acoma, Pueblo of Jemez, Pueblo of Laguna, Pueblo of Ildefonso, Pueblo of Santa Ana, Pueblo of Santa Clara, Pueblo of Taos, Pueblo of Zuni, Southern Ute Tribe, Uintah and Ouray Ute Indian Tribe, and Ute Mountain Ute Tribe) were invited to take part or formally consult in the planning process. The Service's regional archaeologist consulted with the State Historic Preservation Officer, and was intimately involved with the development of this EA. Some nongovernmental organizations that are active in and around the San Luis Valley were also consulted, including Colorado Cattleman's Agricultural Land Trust, Colorado Open Lands, The Nature Conservancy, Rio Grande Headwaters Trust, Orient Land Trust, and Colorado Water Trust.

The Service coordinated internally in the development of this EA as well. Region 6 refuge planning staff and San Luis Valley National Wildlife Refuge Complex staff conducted the analysis and prepared this document, as well as the LPP. An intraservice Endangered Species Act section 7 consultation was conducted, and resulted in a finding of "May affect but not likely to affect" Endangered Species Act protected or candidate species (appendix H). Region 6 Migratory Birds staff guided the development of our focal species list, and both that office and staff from the Region 6 Fisheries office reviewed the document (See appendix A, List of Preparers and Reviewers).

### Contaminants and Hazardous Waste

The Service is required to invest in healthy lands. At a minimum, a Level I pre-acquisition site assessment by the USFWS Ecological Services – Colorado Field Office or New Mexico Field Office, as proper, would be required before acquisition.

### National Environmental Policy Act

The Service conducted this analysis under the authority of and in compliance with NEPA, which requires an evaluation of reasonable alternatives that will meet stated objectives, and an assessment of the possible effects on the natural and human environment.

#### ENVIRONMENTAL ASSESSMENT

This will be the basis for determining whether the implementation of the proposed action would constitute a major federal action significantly affecting the quality of natural and human environments. It involved other government agencies and the public in naming issues and alternatives for the proposed project.

#### DISTRIBUTION AND AVAILABILITY

The Service made available the final EA (with the associated LPP in the same volume) to the project mailing list, which includes Federal and State legislative delegations; tribes; Federal, State, and local agencies; nongovernmental organizations; and interested individuals. Copies can be requested from the USFWS Region 6 office. The documents are also available electronically on the refuge planning Web site.

- Project Web site: <http://www.fws.gov/mountain-prairie/planning/lpp/index.html>
- Project email: [slvrefugesplanning@fws.gov](mailto:slvrefugesplanning@fws.gov)
- Planning Team Leader:  
 Dr. Mike Dixon  
 Attn: SCCA EA  
 Division of Refuge Planning  
 U.S. Fish and Wildlife Service  
 P.O. Box 25486, Denver Federal Center  
 Denver, CO 80225  
 303 / 236-8132



# Appendix B

## *List of Preparers and Reviewers*

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<i>Author's name</i>	<i>Position</i>	<i>Work unit</i>
Mike Blenden	project leader	USFWS, San Luis Valley NWR Complex, Alamosa, CO
Mike Dixon	land protection planner	USFWS, Region 6, Planning Division, Lakewood, CO
Mark Ely	Geographic Information Systems specialist	USFWS, Region 6, Planning Division, Lakewood, CO
Meg Estep	chief, water resources	USFWS, Region 6, Water Resources Division, Lakewood, CO
Lynne Koontz	economist	USGS, Fort Collins Science Center, Policy and Science Analysis Assistance, Fort Collins, CO
Erik Larsen	student intern	USGS, Fort Collins Science Center, Policy and Science Analysis Assistance, Fort Collins, CO
Leslie Richardson	economist	USGS, Fort Collins Science Center, Policy and Science Analysis Assistance, Fort Collins, CO
Catherine M. Cullinane Thomas	economist	USGS, Fort Collins Science Center, Policy and Science Analysis Assistance, Fort Collins, CO
Meg Van Ness	regional archaeologist	USFWS, Region 6, Archaeology Division, Alamosa, CO

<i>Reviewer's name</i>	<i>Position</i>	<i>Work unit</i>
David Lucas	chief, refuge Planning	USFWS, Region 6, Planning Division, Lakewood, CO
Brooke McDonald	writer–editor	North State Resources, Inc., Redding, CA
Kathryn McDonald	managing writer–editor	North State Resources, Inc., Redding, CA
Sue Oliveira	chief, realty	USFWS, Region 6, Planning Division, Lakewood, CO
Laurie Shannon	conservation planner	USFWS, Region 6, Planning Division, Lakewood, CO
Mitch Werner	writer–editor	USFWS, Region 6, Planning Division, Lakewood, CO



# Appendix C

## *Species List of the Sangre de Cristo Conservation Area*

Sources: Colorado Natural Diversity Information Source, San Luis Valley National Wildlife Refuge Complex Species List, USGS Nonindigenous Aquatic Species Database, NRCS Plants Database

\* Nonnative (Because of the number of plant species in the project area, introduced plants are not shown)

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<b>Birds</b>		
<i>Recurvirostra americana</i>	American avocet	
<i>Botaurus lentiginosus</i>	American bittern	
<i>Fulica americana</i>	American coot	
<i>Corvus brachyrhynchos</i>	American crow	
<i>Cinclus mexicanus</i>	American dipper	
<i>Carduelis tristis</i>	American goldfinch	
<i>Pluvialis dominica</i>	American golden plover	
<i>Falco sparverius</i>	American kestrel	
<i>Falco peregrinus anatum</i>	American peregrine falcon	
<i>Anthus rubescens</i>	American pipit	
<i>Turdus migratorius</i>	American robin	
<i>Spizella arborea</i>	American tree sparrow	
<i>Pelecanus erythrorhynchos</i>	American white pelican	
<i>Anas americana</i>	American wigeon	
<i>Calypte anna</i>	Anna's hummingbird	
<i>Gavia arctica</i>	Arctic loon	
<i>Myiarchus cinerascens</i>	Ash-throated flycatcher	
<i>Calidris bairdii</i>	Baird's sandpiper	
<i>Haliaeetus leucocephalus</i>	Bald eagle	SC
<i>Columba fasciata</i>	Band-tailed pigeon	
<i>Riparia riparia</i>	Bank swallow	
<i>Tyto alba</i>	Barn owl	
<i>Hirundo rustica</i>	Barn swallow	
<i>Bucephala islandica</i>	Barrow's goldeneye	
<i>Ceryle alcyon</i>	Belted kingfisher	
<i>Thryomanes bewickii</i>	Bewick's wren	
<i>Sayornis nigricans</i>	Black phoebe	
<i>Leucosticte atrata</i>	Black rosy finch	
<i>Cypseloides niger</i>	Black swift	
<i>Chlidonias niger</i>	Black tern	
<i>Mniotilta varia</i>	Black-and-white warbler	
<i>Pluvialis squatarola</i>	Black-bellied plover	
<i>Pica pica</i>	Black-billed magpie	
<i>Poecile atricapillus</i>	Black-capped chickadee	
<i>Archilochus alexandri</i>	Black-chinned hummingbird	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Nycticorax nycticorax</i>	Black-crowned night-heron	
<i>Pheucticus melanocephalus</i>	Black-headed grosbeak	
<i>Himantopus mexicanus</i>	Black-necked stilt	
<i>Dendroica striata</i>	Blackpoll warbler	
<i>Dendroica caerulescens</i>	Black-throated blue warbler	
<i>Dendroica nigrescens</i>	Black-throated gray warbler	
<i>Amphispiza bilineata</i>	Black-throated sparrow	
<i>Guiraca caerulea</i>	Blue grosbeak	
<i>Dendragapus obscurus</i>	Blue grouse	
<i>Cyanocitta cristata</i>	Blue jay	
<i>Poliophtila caerulea</i>	Blue-gray gnatcatcher	
<i>Anas discors</i>	Blue-winged teal	
<i>Dolichonyx oryzivorus</i>	Bobolink	
<i>Bombycilla garrulus</i>	Bohemian waxwing	
<i>Larus philadelphia</i>	Bonaparte's gull	
<i>Aegolius funereus</i>	Boreal owl	
<i>Euphagus cyanocephalus</i>	Brewer's blackbird	
<i>Spizella breweri</i>	Brewer's sparrow	
<i>Selasphorus platycercus</i>	Broad-tailed hummingbird	
<i>Certhia americana</i>	Brown creeper	
<i>Toxostoma rufum</i>	Brown thrasher	
<i>Leucosticte australis</i>	Brown-capped rosy finch	
<i>Molothrus ater</i>	Brown-headed cowbird	
<i>Bucephala albeola</i>	Bufflehead	
<i>Icterus bullockii</i>	Bullock's oriole	
<i>Athene cunicularia</i>	Burrowing owl	ST
<i>Psaltriparus minimus</i>	Bushtit	
<i>Branta hutchinsii</i>	Cackling goose	
<i>Larus californicus</i>	California gull	
<i>Stellula calliope</i>	Calliope hummingbird	
<i>Branta canadensis</i>	Canada goose	
<i>Aythya valisineria</i>	Canvasback	
<i>Pipilo fuscus</i>	Canyon towhee	
<i>Catherpes mexicanus</i>	Canyon wren	
<i>Hydroprogne caspia</i>	Caspian tern	
<i>Carpodacus cassinii</i>	Cassin's finch	
<i>Tyrannus vociferans</i>	Cassin's kingbird	
<i>Aimophila cassinii</i>	Cassin's sparrow	
<i>Bubulcus ibis</i>	Cattle egret	
<i>Bombycilla cedrorum</i>	Cedar waxwing	
<i>Dendroica pensylvanica</i>	Chestnut-sided warbler	
<i>Corvus cryptoleucus</i>	Chihuahuan raven	
<i>Spizella passerina</i>	Chipping sparrow	
<i>Anas cyanoptera</i>	Cinnamon teal	
<i>Aechmophorus clarkii</i>	Clark's grebe	
<i>Nucifraga columbiana</i>	Clark's nutcracker	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Spizella pallida</i>	Clay-colored sparrow	
<i>Petrochelidon pyrrhonota</i>	Cliff swallow	
<i>Bucephala clangula</i>	Common goldeneye	
<i>Quiscalus quiscula</i>	Common grackle	
<i>Gavia immer</i>	Common loon	
<i>Mergus merganser</i>	Common merganser	
<i>Chordeiles minor</i>	Common nighthawk	
<i>Phalaenoptilus nuttallii</i>	Common poorwill	
<i>Corvus corax</i>	Common raven	
<i>Carduelis flammea</i>	Common redpoll	
<i>Gallinago gallinago</i>	Common snipe	
<i>Sterna hirundo</i>	Common tern	
<i>Geothlypis trichas</i>	Common yellowthroat	
<i>Accipiter cooperii</i>	Cooper's hawk	
<i>Empidonax occidentalis</i>	Cordilleran flycatcher	
<i>Junco hyemalis</i>	Dark-eyed junco	
<i>Spiza americana</i>	Dickcissel	
<i>Phalacrocorax auritus</i>	Double-crested cormorant	
<i>Picoides pubescens</i>	Downy woodpecker	
<i>Empidonax oberholseri</i>	Dusky flycatcher	
<i>Dendragapus obscurus</i>	Dusky grouse	
<i>Podiceps nigricollis</i>	Eared grebe	
<i>Tyrannus tyrannus</i>	Eastern kingbird	
<i>Streptopelia decaocto</i>	Eurasian collared-dove*	
<i>Sturnus vulgaris</i>	European starling*	
<i>Coccothraustes vespertinus</i>	Evening grosbeak	
<i>Buteo regalis</i>	Ferruginous hawk	SC
<i>Otus flammeolus</i>	Flammulated owl	
<i>Sterna forsteri</i>	Forster's tern	
<i>Passerella iliaca</i>	Fox sparrow	
<i>Larus pipixcan</i>	Franklin's gull	
<i>Anas strepera</i>	Gadwall	
<i>Callipepla gambelii</i>	Gambel's quail	
<i>Larus glaucescens</i>	Glaucous-winged gull	
<i>Aquila chrysaetos</i>	Golden eagle	
<i>Regulus satrapa</i>	Golden-crowned kinglet	
<i>Dendroica graciae</i>	Grace's warbler	
<i>Ammodramus savannarum</i>	Grasshopper sparrow	
<i>Dumetella carolinensis</i>	Gray catbird	
<i>Empidonax wrightii</i>	Gray flycatcher	
<i>Perisoreus canadensis</i>	Gray jay	
<i>Leucosticte tephrocotis</i>	Gray-crowned rosy finch	
<i>Ardea herodias</i>	Great blue heron	
<i>Ardea alba</i>	Great egret	
<i>Bubo virginianus</i>	Great horned owl	
<i>Geococcyx californianus</i>	Greater roadrunner	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Grus canadensis tabida</i>	Greater sandhill crane	SC
<i>Aythya marila</i>	Greater scaup	
<i>Anser albifrons</i>	Greater white-fronted goose	
<i>Tringa melanoleuca</i>	Greater yellowlegs	
<i>Quiscalus mexicanus</i>	Great-tailed grackle	
<i>Butorides virescens</i>	Green heron	
<i>Pipilo chlorurus</i>	Green-tailed towhee	
<i>Anas crecca</i>	Green-winged teal	
<i>Centrocercus minimus</i>	Gunnison sage-grouse	SC
<i>Picoides villosus</i>	Hairy woodpecker	
<i>Empidonax hammondi</i>	Hammond's flycatcher	
<i>Zonotrichia querula</i>	Harris' sparrow	
<i>Catharus guttatus</i>	Hermit thrush	
<i>Larus argentatus</i>	Herring gull	
<i>Lophodytes cucullatus</i>	Hooded merganser	
<i>Podiceps auritus</i>	Horned grebe	
<i>Eremophila alpestris</i>	Horned lark	
<i>Carpodacus mexicanus</i>	House finch	
<i>Passer domesticus</i>	House sparrow*	
<i>Troglodytes aedon</i>	House wren	
<i>Passerina cyanea</i>	Indigo bunting	
<i>Baeolophus griseus</i>	Juniper titmouse	
<i>Charadrius vociferus</i>	Killdeer	
<i>Calcarius lapponicus</i>	Lapland longspur	
<i>Calamospiza melanocorys</i>	Lark bunting	
<i>Chondestes grammacus</i>	Lark sparrow	
<i>Passerina amoena</i>	Lazuli bunting	
<i>Ixobrychus exilis</i>	Least bittern	
<i>Empidonax minimus</i>	Least flycatcher	
<i>Calidris minutilla</i>	Least sandpiper	
<i>Sternula antillarum</i>	Least tern	FE, SE
<i>Carduelis psaltria</i>	Lesser goldfinch	
<i>Aythya affinis</i>	Lesser scaup	
<i>Tringa flavipes</i>	Lesser yellowlegs	
<i>Melanerpes lewis</i>	Lewis' woodpecker	
<i>Melospiza lincolnii</i>	Lincoln's sparrow	
<i>Egretta caerulea</i>	Little blue heron	
<i>Lanius ludovicianus</i>	Loggerhead shrike	
<i>Numenius americanus</i>	Long-billed curlew	SC
<i>Limnodromus scolopaceus</i>	Long-billed dowitcher	
<i>Asio otus</i>	Long-eared owl	
<i>Oporornis tolmiei</i>	MacGillivray's warbler	
<i>Eugenes fulgens</i>	Magnificent hummingbird	
<i>Anas platyrhynchos</i>	Mallard	
<i>Limosa fedoa</i>	Marbled godwit	
<i>Cistothorus palustris</i>	Marsh wren	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Falco columbarius</i>	Merlin	
<i>Strix occidentalis lucida</i>	Mexican spotted owl	FT, ST
<i>Sialia currucoides</i>	Mountain bluebird	
<i>Poecile gambeli</i>	Mountain chickadee	
<i>Charadrius montanus</i>	Mountain plover	SC
<i>Zenaida macroura</i>	Mourning dove	
<i>Vermivora ruficapilla</i>	Nashville warbler	
<i>Cardinalis cardinalis</i>	Northern cardinal	
<i>Colaptes auratus</i>	Northern flicker	
<i>Accipiter gentilis</i>	Northern goshawk	
<i>Circus cyaneus</i>	Northern harrier	
<i>Mimus polyglottos</i>	Northern mockingbird	
<i>Parula americana</i>	Northern parula	
<i>Anas acuta</i>	Northern pintail	
<i>Glaucidium gnoma</i>	Northern pygmy-owl	
<i>Stelgidopteryx serripennis</i>	Northern rough-winged swallow	
<i>Aegolius acadicus</i>	Northern saw-whet owl	
<i>Anas clypeata</i>	Northern shoveler	
<i>Lanius excubitor</i>	Northern shrike	
<i>Seiurus noveboracensis</i>	Northern waterthrush	
<i>Contopus cooperi</i>	Olive-sided flycatcher	
<i>Vermivora celata</i>	Orange-crowned warbler	
<i>Pandion haliaetus</i>	Osprey	
<i>Seiurus aurocapillus</i>	Ovenbird	
<i>Gavia pacifica</i>	Pacific loon	
<i>Calidris melanotos</i>	Pectoral sandpiper	
<i>Falco peregrinus</i>	Peregrine falcon	SC
<i>Podilymbus podiceps</i>	Pied-billed grebe	
<i>Pinicola enucleator</i>	Pine grosbeak	
<i>Carduelis pinus</i>	Pine siskin	
<i>Gymnorhinus cyanocephalus</i>	Pinyon jay	
<i>Vireo plumbeus</i>	Plumbeous vireo	
<i>Falco mexicanus</i>	Prairie falcon	
<i>Porphyrio martinica</i>	Purple gallinule	
<i>Progne subis</i>	Purple martin	
<i>Sitta pygmaea</i>	Pygmy nuthatch	
<i>Loxia curvirostra</i>	Red crossbill	
<i>Mergus serrator</i>	Red-breasted merganser	
<i>Sitta canadensis</i>	Red-breasted nuthatch	
<i>Vireo olivaceus</i>	Red-eyed vireo	
<i>Aythya americana</i>	Redhead	
<i>Melanerpes erythrocephalus</i>	Red-headed woodpecker	
<i>Sphyrapicus nuchalis</i>	Red-naped sapsucker	
<i>Phalaropus lobatus</i>	Red-necked phalarope	
<i>Buteo jamaicensis</i>	Red-tailed hawk	
<i>Agelaius phoeniceus</i>	Red-winged blackbird	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Larus delawarensis</i>	Ring-billed gull	
<i>Aythya collaris</i>	Ring-necked duck	
<i>Phasianus colchicus</i>	Ring-necked pheasant*	
<i>Columba livia</i>	Rock pigeon*	
<i>Salpinctes obsoletus</i>	Rock wren	
<i>Pheucticus ludovicianus</i>	Rose-breasted grosbeak	
<i>Chen rossii</i>	Ross' goose	
<i>Buteo lagopus</i>	Rough-legged hawk	
<i>Regulus calendula</i>	Ruby-crowned kinglet	
<i>Oxyura jamaicensis</i>	Ruddy duck	
<i>Selasphorus rufus</i>	Rufous hummingbird	
<i>Aimophila ruficeps</i>	Rufous-crowned sparrow	
<i>Xema sabini</i>	Sabine's gull	
<i>Centrocercus urophasianus</i>	Sage-grouse	
<i>Amphispiza belli</i>	Sage sparrow	
<i>Oreoscoptes montanus</i>	Sage thrasher	
<i>Calidris alba</i>	Sanderling	
<i>Grus canadensis</i>	Sandhill crane	
<i>Passerculus sandwichensis</i>	Savannah sparrow	
<i>Sayornis saya</i>	Say's phoebe	
<i>Tyrannus forficatus</i>	Scissor-tailed flycatcher	
<i>Cistothorus platensis</i>	Sedge wren	
<i>Charadrius semipalmatus</i>	Semipalmated plover	
<i>Calidris pusilla</i>	Semipalmated sandpiper	
<i>Accipiter striatus</i>	Sharp-shinned hawk	
<i>Limnodromus griseus</i>	Short-billed dowitcher	
<i>Asio flammeus</i>	Short-eared owl	
<i>Chen caerulescens</i>	Snow goose	
<i>Egretta thula</i>	Snowy egret	
<i>Charadrius alexandrinus</i>	Snowy plover	SC
<i>Tringa solitaria</i>	Solitary sandpiper	
<i>Melospiza melodia</i>	Song sparrow	
<i>Porzana carolina</i>	Sora	
<i>Empidonax traillii extimus</i>	Southwestern willow flycatcher	FE, SE
<i>Strix occidentalis</i>	Spotted owl	
<i>Actitis macularia</i>	Spotted sandpiper	
<i>Pipilo maculatus</i>	Spotted towhee	
<i>Cyanocitta stelleri</i>	Steller's jay	
<i>Calidris himantopus</i>	Stilt sandpiper	
<i>Melanitta perspicillata</i>	Surf scoter	
<i>Piranga rubra</i>	Summer tanager	
<i>Buteo swainsoni</i>	Swainson's hawk	
<i>Catharus ustulatus</i>	Swainson's thrush	
<i>Melospiza georgiana</i>	Swamp sparrow	
<i>Vermivora peregrina</i>	Tennessee warbler	
<i>Picoides tridactylus</i>	Three-toed woodpecker	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Myadestes townsendi</i>	Townsend's solitaire	
<i>Dendroica townsendi</i>	Townsend's warbler	
<i>Tachycineta bicolor</i>	Tree swallow	
<i>Cygnus columbianus</i>	Tundra swan	
<i>Cathartes aura</i>	Turkey vulture	
<i>Ixoreus naevius</i>	Varied thrush	
<i>Catharus fuscescens</i>	Veery	
<i>Pyrocephalus rubinus</i>	Vermilion flycatcher	
<i>Pooecetes gramineus</i>	Vesper sparrow	
<i>Tachycineta thalassina</i>	Violet-green swallow	
<i>Rallus limicola</i>	Virginia rail	
<i>Vermivora virginiae</i>	Virginia's warbler	
<i>Vireo gilvus</i>	Warbling vireo	
<i>Sialia mexicana</i>	Western bluebird	
<i>Athene cunicularia</i>	Western burrowing owl	
<i>Aechmophorus occidentalis</i>	Western grebe	
<i>Tyrannus verticalis</i>	Western kingbird	
<i>Sturnella neglecta</i>	Western meadowlark	
<i>Calidris mauri</i>	Western sandpiper	
<i>Otus kennicottii</i>	Western screech-owl	
<i>Aphelocoma californica</i>	Western scrub jay	
<i>Charadrius alexandrinus nivosus</i>	Western snowy plover	
<i>Piranga ludoviciana</i>	Western tanager	
<i>Contopus sordidulus</i>	Western wood-pewee	
<i>Numenius phaeopus</i>	Whimbrel	
<i>Eudocimus albus</i>	White ibis	
<i>Sitta carolinensis</i>	White-breasted nuthatch	
<i>Zonotrichia leucophrys</i>	White-crowned sparrow	
<i>Plegadis chihi</i>	White-faced ibis	
<i>Calidris fuscicollis</i>	White-rumped sandpiper	
<i>Lagopus leucurus</i>	White-tailed ptarmigan	
<i>Zonotrichia albicollis</i>	White-throated sparrow	
<i>Aeronautes saxatalis</i>	White-throated swift	
<i>Loxia leucoptera</i>	White-winged crossbill	
<i>Melanitta fusca</i>	White-winged scoter	
<i>Meleagris gallopavo</i>	Wild turkey	
<i>Grus americana</i>	Whooping crane	FE, SE
<i>Catoptrophorus semipalmatus</i>	Willet	
<i>Sphyrapicus thyroideus</i>	Williamson's sapsucker	
<i>Empidonax traillii</i>	Willow flycatcher	
<i>Phalaropus tricolor</i>	Wilson's phalarope	
<i>Gallinago delicata</i>	Wilson's snipe	
<i>Wilsonia pusilla</i>	Wilson's warbler	
<i>Aix sponsa</i>	Wood duck	
<i>Helmitheros vermivorum</i>	Worm-eating warbler	
<i>Hylocichla mustelina</i>	Wood thrush	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Dendroica petechia</i>	Yellow warbler	
<i>Coccyzus americanus</i>	Yellow-billed cuckoo	SC
<i>Icteria virens</i>	Yellow-breasted chat	
<i>Xanthocephalus xanthocephalus</i>	Yellow-headed blackbird	
<i>Dendroica coronata</i>	Yellow-rumped warbler	
<b>Amphibians</b>		
<i>Bufo boreas boreas</i>	Boreal toad	SE
<i>Rana catesbeiana</i>	Bullfrog*	
<i>Hyla arenicolor</i>	Canyon treefrog	
<i>Bufo cognatus</i>	Great Plains toad	
<i>Spea multiplicata</i>	New Mexico spadefoot	
<i>Rana pipiens</i>	Northern leopard frog	SC
<i>Spea bombifrons</i>	Plains spadefoot	
<i>Ambystoma tigrinum</i>	Tiger salamander	
<i>Pseudacris triseriata</i>	Western chorus frog	
<i>Bufo woodhousii</i>	Woodhouse's toad	
<b>Mammals</b>		
<i>Sciurus aberti</i>	Abert's squirrel	
<i>Taxidea taxus</i>	American badger	
<i>Castor canadensis</i>	American beaver	
<i>Cervus elaphus</i>	American elk	
<i>Martes americana</i>	American marten	
<i>Ochotona princeps</i>	American pika	
<i>Eptesicus fuscus</i>	Big brown bat	
<i>Ovis canadensis</i>	Bighorn sheep	
<i>Ursus americanus</i>	Black bear	
<i>Mustela nigripes</i>	Black-footed ferret	FE, SE
<i>Lepus californicus</i>	Black-tailed jackrabbit	
<i>Lynx rufus</i>	Bobcat	
<i>Thomomys bottae</i>	Botta's pocket gopher	SC
<i>Tadarida brasiliensis</i>	Brazilian free-tailed bat	
<i>Neotoma cinerea</i>	Bushy-tailed woodrat	
<i>Tamias quadrivittatus</i>	Colorado chipmunk	
<i>Conepatus mesoleucus</i>	Common hog-nosed skunk	
<i>Ondatra zibethicus</i>	Common muskrat	
<i>Erethizon dorsatum</i>	Common porcupine	
<i>Canis latrans</i>	Coyote	
<i>Peromyscus maniculatus</i>	Deer mouse	
<i>Sylvilagus audubonii</i>	Desert cottontail	
<i>Mustela erminea</i>	Ermine	
<i>Myotis thysanodes</i>	Fringed myotis	
<i>Spermophilus lateralis</i>	Golden-mantled ground squirrel	
<i>Urocyon cinereoargenteus</i>	Gray fox	
<i>Cynomys gunnisoni</i>	Gunnison's prairie dog	
<i>Phenacomys intermedius</i>	Heather vole	
<i>Lasiurus cinereus</i>	Hoary bat	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Mus musculus</i>	House mouse*	
<i>Tamias minimus</i>	Least chipmunk	
<i>Myotis lucifugus</i>	Little brown myotis	
<i>Myotis evotis</i>	Long-eared myotis	
<i>Myotis volans</i>	Long-legged myotis	
<i>Microtus longicaudus</i>	Long-tailed vole	
<i>Mustela frenata</i>	Long-tailed weasel	
<i>Lynx canadensis</i>	Lynx	FT, SE
<i>Sorex cinereus</i>	Masked shrew	
<i>Microtus pennsylvanicus</i>	Meadow vole	
<i>Neotoma mexicana</i>	Mexican woodrat	
<i>Mustela vison</i>	Mink	
<i>Sorex monticolus</i>	Montane shrew	
<i>Microtus montanus</i>	Montane vole	
<i>Alces alces</i>	Moose	
<i>Sylvilagus nuttallii</i>	Mountain cottontail	
<i>Oreamnos americanus</i>	Mountain goat	
<i>Felis concolor</i>	Mountain lion	
<i>Odocoileus hemionus</i>	Mule deer	
<i>Onychomys leucogaster</i>	Northern grasshopper mouse	
<i>Thomomys talpoides</i>	Northern pocket gopher	SC
<i>Lutra canadensis</i>	Northern river otter	
<i>Peromyscus nasutus</i>	Northern rock mouse	
<i>Dipodomys ordii</i>	Ord's kangaroo rat	
<i>Tamiasciurus hudsonicus</i>	Pine squirrel	
<i>Perognathus flavescens</i>	Plains pocket mouse	
<i>Antilocapra americana</i>	Pronghorn	
<i>Procyon lotor</i>	Raccoon	
<i>Vulpes vulpes</i>	Red fox	
<i>Bassariscus astutus</i>	Ringtail	
<i>Perognathus flavus</i>	Silky pocket mouse	
<i>Lasionycteris noctivagans</i>	Silver-haired bat	
<i>Lepus americanus</i>	Snowshoe hare	
<i>Clethrionomys gapperi</i>	Southern red-backed vole	
<i>Mephitis mephitis</i>	Striped skunk	
<i>Spermophilus tridecemlineatus</i>	Thirteen-lined ground squirrel	
<i>Plecotus townsendii</i>	Townsend's big-eared bat	SC
<i>Sorex palustris</i>	Water shrew	
<i>Reithrodontomys megalotis</i>	Western harvest mouse	
<i>Zapus princeps</i>	Western jumping mouse	
<i>Myotis ciliolabrum</i>	Western small-footed myotis	
<i>Spilogale gracilis</i>	Western spotted skunk	
<i>Odocoileus virginianus</i>	White-tailed deer	
<i>Lepus townsendii</i>	White-tailed jackrabbit	
<i>Gulo gulo</i>	Wolverine	SE
<i>Spermophilus elegans</i>	Wyoming ground squirrel	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Marmota flaviventris</i>	Yellow-bellied marmot	
<i>Myotis yumanensis</i>	Yuma myotis	
<b>Reptiles</b>		
<i>Sceloporus undulatus</i>	Fence lizard	
<i>Pituophis catenifer</i>	Gopher snake	
<i>Eumeces multivirgatus</i>	Many-lined skink	
<i>Crotalus viridis concolor</i>	Midget faded rattlesnake	SC
<i>Lampropeltis triangulum</i>	Milk snake	
<i>Phrynosoma hernandesi</i>	Short-horned lizard	
<i>Liochlorophis vernalis</i>	Smooth green snake	
<i>Eumeces gaigeae</i>	Variable skink	
<i>Crotalus viridis</i>	Western rattlesnake	
<i>Thamnophis elegans</i>	Western terrestrial garter snake	
<b>Fish</b>		
<i>Anguilla rostrata</i>	American eel*	
<i>Thymallus arcticus</i>	Arctic grayling*	
<i>Ameiurus melas</i>	Black bullhead	
<i>Pomoxis nigromaculatus</i>	Black crappie*	
<i>Gymnocorymbus ternetzi</i>	Black tetra*	
<i>Ictalurus furcatus</i>	Blue catfish*	
<i>Oreochromis aureus</i>	Blue tilapia*	
<i>Lepomis macrochirus</i>	Bluegill*	
<i>Culaea inconstans</i>	Brook stickleback*	
<i>Salvelinus fontinalis</i>	Brook trout*	
<i>Salmo trutta</i>	Brown trout*	
<i>Ictalurus punctatus</i>	Channel catfish*	
<i>Oncorhynchus clarkii pleuriticus</i>	Colorado River cutthroat*	
<i>Cyprinus carpio</i>	Common carp*	
<i>Corydoras sp.</i>	Corydoras catfish*	
<i>Oncorhynchus clarkii x mykiss</i>	Cutbow trout (hybrid)*	
<i>Pimephales promelas</i>	Fathead minnow	
<i>Oncorhynchus clarkii carmichaeli</i>	Fine-spotted Snake River cutthroat*	
<i>Pylodictis olivaris</i>	Flathead catfish*	
<i>Platygobio gracilis</i>	Flathead chub*	
<i>Pterophyllum sp.</i>	Freshwater angelfish*	
<i>Oncorhynchus aguabonita</i>	Golden trout*	
<i>Carassius auratus</i>	Goldfish*	
<i>Ctenopharyngodon idella</i>	Grass carp*	
<i>Xiphophorus hellerii</i>	Green swordtail*	
<i>Lepomis cyanellus</i>	Green sunfish	
<i>Poecilia reticulata</i>	Guppy*	
<i>Hemigrammus ocellifer</i>	Head-and-tail light tetra*	
<i>Oncorhynchus nerka</i>	Kokanee*	
<i>Salvelinus namaycush</i>	Lake trout*	
<i>Salmo salar sebago</i>	Landlocked Atlantic salmon*	
<i>Micropterus salmoides</i>	Largemouth bass*	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Rhinichthys cataractae</i>	Long-nose dace	
<i>Catostomus catostomus</i>	Longnose sucker*	
<i>Cottus bairdii</i>	Mottled sculpin*	
<i>Oreochromis mossambicus</i>	Mozambique tilapia*	
<i>Paracheirodon innesi</i>	Neon tetra*	
<i>Esox lucius</i>	Northern pike*	
<i>Fundulus zebrinus</i>	Plains killifish*	
<i>Fundulus sciadicus</i>	Plains topminnow*	
<i>Lepomis gibbosus</i>	Pumpkinseed*	
<i>Oncorhynchus mykiss</i>	Rainbow trout*	
<i>Symphysodon discus</i>	Red discus*	
<i>Gila pandora</i>	Rio Grande chub	SC
<i>Oncorhynchus clarki virginialis</i>	Rio Grande cutthroat trout	SC; Candidate
<i>Catostomus plebeius</i>	Rio Grande sucker	SE
<i>Poecilia latipinna</i>	Sailfin molly*	
<i>Poecilia mexicana</i>	Shortfin molly*	
<i>Micropterus dolomieu</i>	Smallmouth bass*	
<i>Xiphophorus maculatus</i>	Southern platyfish*	
<i>Hyostomus sp.</i>	Suckermouth catfish*	
<i>Otocinclus sp.</i>	Suckermouth catfish*	
<i>Tinca tinca</i>	Tench*	
<i>Dorosoma petenense</i>	Threadfin shad*	
<i>Xiphophorus variatus</i>	Variable platyfish*	
<i>Pterygoplichthys disjunctivus</i>	Vermiculated sailfin*	
<i>Sander vitreus</i>	Walleye*	
<i>Lepomis gulosus</i>	Warmouth*	
<i>Oncorhynchus clarkii lewisi</i>	West slope cutthroat*	
<i>Gambusia affinis</i>	Western mosquitofish*	
<i>Catostomus commersonii</i>	White sucker*	
<i>Ameiurus natalis</i>	Yellow bullhead*	
<i>Perca flavescens</i>	Yellow perch*	
<i>Oncorhynchus clarkii bowieri</i>	Yellowstone cutthroat*	
<b>Plants</b>		
<i>Abies concolor</i>	White fir	
<i>Abies lasiocarpa</i>	Subalpine fir	
<i>Abies lasiocarpa</i> var. <i>arizonica</i>	Corkbark fir	
<i>Abies lasiocarpa</i> var. <i>lasiocarpa</i>	Subalpine fir	
<i>Acer glabrum</i>	Rocky Mountain maple	
<i>Achillea millefolium</i>	Common yarrow	
<i>Achillea millefolium</i> var. <i>occidentalis</i>	Western yarrow	
<i>Achnatherum xbloomeri</i>		
<i>Achnatherum hymenoides</i>	Indian ricegrass	
<i>Achnatherum lettermanii</i>	Letterman's needlegrass	
<i>Achnatherum nelsonii</i>	Columbia needlegrass	
<i>Achnatherum nelsonii</i> ssp. <i>nelsonii</i>	Columbia needlegrass	
<i>Achnatherum robustum</i>	Sleepygrass	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Achnatherum scribneri</i>	Scribner needlegrass	
<i>Aconitum columbianum</i>	Columbian monkshood	
<i>Aconitum columbianum</i> ssp. <i>columbianum</i>	Columbian monkshood	
<i>Acroptilon repens</i>	Hardheads	
<i>Actaea rubra</i>	Red baneberry	
<i>Actaea rubra</i> ssp. <i>arguta</i>	Red baneberry	
<i>Adoxa moschatellina</i>	Muskroot	
<i>Agastache pallidiflora</i>	Bill Williams Mountain giant hyssop	
<i>Agastache pallidiflora</i> ssp. <i>pallidiflora</i>	Bill Williams Mountain giant hyssop	
<i>Agastache pallidiflora</i> ssp. <i>pallidiflora</i> var. <i>greenei</i>	Bill Williams Mountain giant hyssop	
<i>Agoseris aurantiaca</i>	Orange agoseris	
<i>Agoseris glauca</i>	Pale agoseris	
<i>Agrostis exarata</i>	Spike bentgrass	
<i>Agrostis gigantea</i>	Redtop	
<i>Agrostis humilis</i>	Alpine bentgrass	
<i>Agrostis scabra</i>	Rough bentgrass	
<i>Agrostis variabilis</i>	Mountain bentgrass	
<i>Aletes anisatus</i>	Rocky Mountain Indian parsley	
<i>Aliciella pinnatifida</i>	Sticky gilia	
<i>Alisma gramineum</i>	Narrowleaf water plantain	
<i>Alisma triviale</i>	Northern water plantain	
<i>Allium cernuum</i>	Nodding onion	
<i>Allium geeyeri</i>	Geyer's onion	
<i>Allium geeyeri</i> var. <i>tenerum</i>	Bulbil onion	
<i>Almutaster pauciflorus</i>	Alkali marsh aster	
<i>Alnus incana</i>	Gray alder	
<i>Alnus incana</i> ssp. <i>tenuifolia</i>	Thinleaf alder	
<i>Alopecurus aequalis</i>	Shortawn foxtail	
<i>Alopecurus aequalis</i> var. <i>aequalis</i>	Shortawn foxtail	
<i>Alopecurus alpinus</i>	Boreal alopecurus	
<i>Alyssum simplex</i>	Alyssum	
<i>Amaranthus albus</i>	Prostrate pigweed	
<i>Amaranthus blitoides</i>	Mat amaranth	
<i>Amaranthus retroflexus</i>	Redroot amaranth	
<i>Ambrosia acanthicarpa</i>	Flatspine bur ragweed	
<i>Amelanchier alnifolia</i>	Saskatoon serviceberry	
<i>Amelanchier alnifolia</i> var. <i>alnifolia</i>	Saskatoon serviceberry	
<i>Amelanchier utahensis</i>	Utah serviceberry	
<i>Amelanchier utahensis</i> var. <i>utahensis</i>	Utah serviceberry	
<i>Anaphalis margaritacea</i>	Western pearly everlasting	
<i>Androsace chamaejasme</i>	Sweetflower rockjasmine	
<i>Androsace chamaejasme</i> ssp. <i>carinata</i>	Sweetflower rockjasmine	
<i>Androsace occidentalis</i>	Western rockjasmine	
<i>Androsace septentrionalis</i>	Pygmyflower rockjasmine	
<i>Anemone canadensis</i>	Canadian anemone	
<i>Anemone multifida</i>	Pacific anemone	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Angelica ampla</i>	Giant angelica	
<i>Angelica grayi</i>	Gray's angelica	
<i>Antennaria anaphaloides</i>	Pearly pussytoes	
<i>Antennaria corymbosa</i>	Flat-top pussytoes	
<i>Antennaria marginata</i>	Whitemargin pussytoes	
<i>Antennaria media</i>	Rocky Mountain pussytoes	
<i>Antennaria microphylla</i>	Littleleaf pussytoes	
<i>Antennaria parvifolia</i>	Small-leaf pussytoes	
<i>Antennaria rosea</i>	Rosy pussytoes	
<i>Antennaria rosulata</i>	Kaibab pussytoes	
<i>Antennaria umbrinella</i>	Umber pussytoes	
<i>Apocynum androsaemifolium</i>	Spreading dogbane	
<i>Apocynum cannabinum</i>	Indianhemp	
<i>Aquilegia coerulea</i>	Colorado blue columbine	
<i>Aquilegia elegantula</i>	Western red columbine	
<i>Arabis ×divaricarpa</i>	Spreadingpod rockcress	
<i>Arabis drummondii</i>	Drummond's rockcress	
<i>Arabis fendleri</i>	Fendler's rockcress	
<i>Arabis fendleri</i> var. <i>fendleri</i>	Fendler's rockcress	
<i>Arabis gunnisoniana</i>	Gunnison's rockcress	
<i>Arabis hirsuta</i>	Hairy rockcress	
<i>Arabis hirsuta</i> var. <i>pycnocarpa</i>	Creamflower rockcress	
<i>Arabis holboellii</i>	Holboell's rockcress	
<i>Arabis holboellii</i> var. <i>pinetorum</i>	Holboell's rockcress	
<i>Arabis lignifera</i>	Desert rockcress	
<i>Arabis oxyllobula</i>	Glenwood Springs rockcress	
<i>Arctostaphylos uva-ursi</i>	Kinnikinnick	
<i>Arenaria fendleri</i>	Fendler's sandwort	
<i>Arenaria fendleri</i> var. <i>fendleri</i>	Fendler's sandwort	
<i>Arenaria hookeri</i>	Hooker's sandwort	
<i>Arenaria hookeri</i> ssp. <i>hookeri</i>	Hooker's sandwort	
<i>Arenaria lanuginosa</i>	Spreading sandwort	
<i>Arenaria lanuginosa</i> ssp. <i>saxosa</i>	Spreading sandwort	
<i>Argentina anserina</i>	Silverweed cinquefoil	
<i>Argyroschisma fendleri</i>	Fendler's false cloak fern	
<i>Aristida purpurea</i>	Purple threeawn	
<i>Aristida purpurea</i> var. <i>longiseta</i>	Fendler threeawn	
<i>Aristida purpurea</i> var. <i>purpurea</i>	Purple threeawn	
<i>Arnica chamissonis</i>	Chamisso arnica	
<i>Arnica chamissonis</i> ssp. <i>foliosa</i>	Chamisso arnica	
<i>Arnica chamissonis</i> ssp. <i>foliosa</i> var. <i>andina</i>	Chamisso arnica	
<i>Arnica cordifolia</i>	Heartleaf arnica	
<i>Arnica mollis</i>	Hairy arnica	
<i>Artemisia biennis</i>	Biennial wormwood	
<i>Artemisia biennis</i> var. <i>biennis</i>	Biennial wormwood	
<i>Artemisia bigelovii</i>	Bigelow sage	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Artemisia campestris</i>	Field sagewort	
<i>Artemisia campestris</i> ssp. <i>borealis</i>	Field sagewort	
<i>Artemisia campestris</i> ssp. <i>borealis</i> var. <i>borealis</i>	Field sagewort	
<i>Artemisia campestris</i> ssp. <i>borealis</i> var. <i>scouleriana</i>	Field sagewort	
<i>Artemisia campestris</i> ssp. <i>caudata</i>	Field sagewort	
<i>Artemisia cana</i>	Silver sagebrush	
<i>Artemisia cana</i> ssp. <i>cana</i>	Silver sagebrush	
<i>Artemisia carruthii</i>	Carruth's sagewort	
<i>Artemisia dracunculus</i>	Tarragon	
<i>Artemisia franserioides</i>	Ragweed sagebrush	
<i>Artemisia frigida</i>	Prairie sagewort	
<i>Artemisia longifolia</i>	Longleaf wormwood	
<i>Artemisia ludoviciana</i>	White sagebrush	
<i>Artemisia ludoviciana</i> ssp. <i>albula</i>	White sagebrush	
<i>Artemisia ludoviciana</i> ssp. <i>incompta</i>	White sagebrush	
<i>Artemisia ludoviciana</i> ssp. <i>ludoviciana</i>	White sagebrush	
<i>Artemisia michauxiana</i>	Michaux's wormwood	
<i>Artemisia parryi</i>	Parry's wormwood	
<i>Artemisia scopulorum</i>	Alpine sagebrush	
<i>Artemisia tridentata</i>	Big sagebrush	
<i>Artemisia tridentata</i> ssp. <i>tridentata</i>	Basin big sagebrush	
<i>Artemisia tridentata</i> ssp. <i>vaseyana</i>	Mountain big sagebrush	
<i>Asclepias hallii</i>	Hall's milkweed	
<i>Asclepias speciosa</i>	Showy milkweed	
<i>Asparagus officinalis</i>	Garden asparagus	
<i>Asplenium septentrionale</i>	Forked spleenwort	
<i>Aster alpinus</i>	Alpine aster	
<i>Aster alpinus</i> var. <i>vierhapperi</i>	Vierhapper's aster	
<i>Astragalus agrestis</i>	Purple milkvetch	
<i>Astragalus allochrous</i>	Halfmoon milkvetch	
<i>Astragalus allochrous</i> var. <i>playanus</i>	Halfmoon milkvetch	
<i>Astragalus alpinus</i>	Alpine milkvetch	
<i>Astragalus alpinus</i> var. <i>alpinus</i>	Alpine milkvetch	
<i>Astragalus bisulcatus</i>	Twogrooved milkvetch	
<i>Astragalus bodinii</i>	Bodin's milkvetch	
<i>Astragalus brandegeei</i>	Brandegge's milkvetch	
<i>Astragalus ceramicus</i>	Painted milkvetch	
<i>Astragalus ceramicus</i> var. <i>ceramicus</i>	Painted milkvetch	
<i>Astragalus cerussatus</i>	Powdery milkvetch	
<i>Astragalus crassicaarpus</i>	Groundplum milkvetch	
<i>Astragalus crassicaarpus</i> var. <i>crassicaarpus</i>	Groundplum milkvetch	
<i>Astragalus drummondii</i>	Drummond's milkvetch	
<i>Astragalus flexuosus</i>	Flexile milkvetch	
<i>Astragalus flexuosus</i> var. <i>flexuosus</i>	Flexile milkvetch	
<i>Astragalus hallii</i>	Hall's milkvetch	
<i>Astragalus hallii</i> var. <i>hallii</i>	Hall's milkvetch	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Astragalus kentrophyta</i>	Spiny milkvetch	
<i>Astragalus kentrophyta</i> var. <i>tegetarius</i>	Mat milkvetch	
<i>Astragalus laxmannii</i>	Laxmann's milkvetch	
<i>Astragalus laxmannii</i> var. <i>robustior</i>	Prairie milkvetch	
<i>Astragalus miser</i>	Timber milkvetch	
<i>Astragalus miser</i> var. <i>oblongifolius</i>	Timber milkvetch	
<i>Astragalus pattersonii</i>	Patterson's milkvetch	
<i>Astragalus ripleyi</i>	Ripley's milkvetch	
<i>Astragalus scopulorum</i>	Rocky Mountain milkvetch	
<i>Astragalus tenellus</i>	Looseflower milkvetch	
<i>Atriplex xaptera</i>	Moundscale	
<i>Atriplex argentea</i>	Silverscale saltbush	
<i>Atriplex canescens</i>	Fourwing saltbush	
<i>Atriplex canescens</i> var. <i>canescens</i>	Fourwing saltbush	
<i>Atriplex patula</i>	Spear saltbush	
<i>Atriplex rosea</i>	Tumbling saltweed	
<i>Atriplex truncata</i>	Wedgescale saltbush	
<i>Atriplex wolfii</i>	Wolf's saltweed	
<i>Bahia dissecta</i>	Ragleaf bahia	
<i>Balsamorhiza sagittata</i>	Arrowleaf balsamroot	
<i>Bassia hyssopifolia</i>	Fivehorn smotherweed	
<i>Bassia scoparia</i>	Burningbush	
<i>Beckmannia syzigachne</i>	American sloughgrass	
<i>Berberis fendleri</i>	Colorado barberry	
<i>Besseyia alpina</i>	Alpine besseyia	
<i>Besseyia plantaginea</i>	White River coraldrops	
<i>Betula occidentalis</i>	Water birch	
<i>Bidens cernua</i>	Nodding beggartick	
<i>Bidens frondosa</i>	Devil's beggartick	
<i>Bidens tenuisecta</i>	Slimlobe beggarticks	
<i>Bidens vulgata</i>	Big devils beggartick	
<i>Blepharoneuron tricholepis</i>	Pine dropseed	
<i>Botrychium hesperium</i>	Western moonwort	
<i>Botrychium pinnatum</i>	Northern moonwort	
<i>Botrychium simplex</i>	Little grapefern	
<i>Bouteloua gracilis</i>	Blue grama	
<i>Bouteloua simplex</i>	Matted grama	
<i>Brassica juncea</i>	India mustard	
<i>Brassica napus</i>	Rape	
<i>Brickellia eupatorioides</i>	False boneset	
<i>Brickellia eupatorioides</i> var. <i>chlorolepis</i>	False boneset	
<i>Brickellia grandiflora</i>	Tasselflower brickellbush	
<i>Bromus ciliatus</i>	Fringed brome	
<i>Bromus ciliatus</i> var. <i>ciliatus</i>	Fringed brome	
<i>Bromus inermis</i>	Smooth brome	
<i>Bromus inermis</i> ssp. <i>inermis</i>	Smooth brome	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Bromus inermis</i> ssp. <i>inermis</i> var. <i>inermis</i>	Smooth brome	
<i>Bromus lanatipes</i>	Woolly brome	
<i>Bromus porteri</i>	Porter brome	
<i>Bromus tectorum</i>	Cheatgrass	
<i>Calamagrostis canadensis</i>	Bluejoint	
<i>Calamagrostis purpurascens</i>	Purple reedgrass	
<i>Calamagrostis purpurascens</i> var. <i>purpurascens</i>	Purple reedgrass	
<i>Calamagrostis stricta</i>	Slimstem reedgrass	
<i>Callitriche palustris</i>	Vernal water-starwort	
<i>Calochortus gunnisonii</i>	Gunnison's mariposa lily	
<i>Calochortus gunnisonii</i> var. <i>gunnisonii</i>	Gunnison's mariposa lily	
<i>Caltha leptosepala</i>	White marsh marigold	
<i>Caltha leptosepala</i> ssp. <i>leptosepala</i>	White marsh marigold	
<i>Caltha leptosepala</i> ssp. <i>leptosepala</i> var. <i>leptosepala</i>	White marsh marigold	
<i>Camelina microcarpa</i>	Littlepod false flax	
<i>Campanula parryi</i>	Parry's bellflower	
<i>Campanula parryi</i> var. <i>parryi</i>	Parry's bellflower	
<i>Campanula rotundifolia</i>	Bluebell bellflower	
<i>Campanula uniflora</i>	Arctic bellflower	
<i>Capsella bursa-pastoris</i>	Shepherd's purse	
<i>Cardamine cordifolia</i>	Heartleaf bittercress	
<i>Cardamine cordifolia</i> var. <i>incana</i>	Heartleaf bittercress	
<i>Cardaria chalepensis</i>	Lenspod whitetop	
<i>Cardaria draba</i>	Whitetop	
<i>Cardaria pubescens</i>	Hairy whitetop	
<i>Carex albonigra</i>	Blackandwhite sedge	
<i>Carex aquatilis</i>	Water sedge	
<i>Carex aquatilis</i> var. <i>aquatilis</i>	Water sedge	
<i>Carex atherodes</i>	Wheat sedge	
<i>Carex aurea</i>	Golden sedge	
<i>Carex bella</i>	Southwestern showy sedge	
<i>Carex brunnescens</i>	Brownish sedge	
<i>Carex brunnescens</i> ssp. <i>sphaerostachya</i>	Brownish sedge	
<i>Carex canescens</i>	Silvery sedge	
<i>Carex canescens</i> ssp. <i>canescens</i>	Silvery sedge	
<i>Carex diandra</i>	Lesser panicled sedge	
<i>Carex disperma</i>	Softleaf sedge	
<i>Carex douglasii</i>	Douglas' sedge	
<i>Carex duriuscula</i>	Needleleaf sedge	
<i>Carex ebenea</i>	Ebony sedge	
<i>Carex elynoides</i>	Blackroot sedge	
<i>Carex geophila</i>	White Mountain sedge	
<i>Carex geyeri</i>	Geyer's sedge	
<i>Carex hallii</i>	Deer sedge	
<i>Carex haydeniana</i>	Cloud sedge	
<i>Carex heteroneura</i>	Different-nerve sedge	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Carex heteroneura</i> var. <i>brevisquama</i>	Different-nerve sedge	
<i>Carex heteroneura</i> var. <i>chalciolepis</i>	Holm sedge	
<i>Carex inops</i>	Long-stolon sedge	
<i>Carex inops</i> ssp. <i>heliophila</i>	Sun sedge	
<i>Carex microptera</i>	Smallwing sedge	
<i>Carex nebrascensis</i>	Nebraska sedge	
<i>Carex nelsonii</i>	Nelson's sedge	
<i>Carex nigricans</i>	Black alpine sedge	
<i>Carex norvegica</i>	Norway sedge	
<i>Carex norvegica</i> ssp. <i>stevenii</i>	Steven's sedge	
<i>Carex nova</i>	Black sedge	
<i>Carex obtusata</i>	Obtuse sedge	
<i>Carex occidentalis</i>	Western sedge	
<i>Carex parryana</i>	Parry's sedge	
<i>Carex parryana</i> var. <i>parryana</i>	Parry's sedge	
<i>Carex pellita</i>	Woolly sedge	
<i>Carex perglobosa</i>	Globe sedge	
<i>Carex phaeocephala</i>	Dunhead sedge	
<i>Carex praegracilis</i>	Clustered field sedge	
<i>Carex praticola</i>	Meadow sedge	
<i>Carex pyrenaica</i>	Pyrenean sedge	
<i>Carex pyrenaica</i> ssp. <i>pyrenaica</i>	Pyrenean sedge	
<i>Carex scopulorum</i>	Mountain sedge	
<i>Carex siccata</i>	Dryspike sedge	
<i>Carex simulata</i>	Analogue sedge	
<i>Carex utriculata</i>	Northwest Territory sedge	
<i>Carex vernacula</i>	Native sedge	
<i>Carex vesicaria</i>	Blister sedge	
<i>Carex vesicaria</i> var. <i>vesicaria</i>	Blister sedge	
<i>Carum carvi</i>	Caraway	
<i>Castilleja flava</i>	Yellow Indian paintbrush	
<i>Castilleja flava</i> var. <i>flava</i>	Yellow Indian paintbrush	
<i>Castilleja haydenii</i>	Hayden's Indian paintbrush	
<i>Castilleja integra</i>	Wholeleaf Indian paintbrush	
<i>Castilleja integra</i> var. <i>integra</i>	Wholeleaf Indian paintbrush	
<i>Castilleja linariifolia</i>	Wyoming Indian paintbrush	
<i>Castilleja miniata</i>	Giant red Indian paintbrush	
<i>Castilleja miniata</i> ssp. <i>miniata</i>	Giant red Indian paintbrush	
<i>Castilleja occidentalis</i>	Western Indian paintbrush	
<i>Castilleja rhexiifolia</i>	Splitleaf Indian paintbrush	
<i>Castilleja sulphurea</i>	Sulphur Indian paintbrush	
<i>Ceanothus fendleri</i>	Fendler's ceanothus	
<i>Ceanothus velutinus</i>	Snowbrush ceanothus	
<i>Ceanothus velutinus</i> var. <i>velutinus</i>	Snowbrush ceanothus	
<i>Cerastium arvense</i>	Field chickweed	
<i>Cerastium arvense</i> ssp. <i>strictum</i>	Feld chickweed	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Cerastium beeringianum</i>	Bering chickweed	
<i>Cerastium beeringianum</i> ssp. <i>earlei</i>	Bering chickweed	
<i>Cercocarpus montanus</i>	Alderleaf mountain mahogany	
<i>Chaenactis douglasii</i>	Douglas' dustymaiden	
<i>Chaenactis douglasii</i> var. <i>alpina</i>	Alpine dustymaiden	
<i>Chaetopappa ericoides</i>	Rose heath	
<i>Chamaerhodos erecta</i>	Little rose	
<i>Chamaerhodos erecta</i> ssp. <i>nuttallii</i>	Nuttall's little rose	
<i>Chamaesyce serpyllifolia</i>	Thymeleaf sandmat	
<i>Chamaesyce serpyllifolia</i> ssp. <i>serpyllifolia</i>	Thymeleaf sandmat	
<i>Chamerion angustifolium</i>	Fireweed	
<i>Chamerion angustifolium</i> ssp. <i>circumvagum</i>	Fireweed	
<i>Cheilanthes feei</i>	Slender lipfern	
<i>Cheilanthes fendleri</i>	Fendler's lipfern	
<i>Chenopodium album</i>	Lambsquarters	
<i>Chenopodium atrovirens</i>	Pinyon goosefoot	
<i>Chenopodium berlandieri</i>	Pitseed goosefoot	
<i>Chenopodium botrys</i>	Jerusalem oak goosefoot	
<i>Chenopodium desiccatum</i>	Aridland goosefoot	
<i>Chenopodium foliosum</i>	Leafy goosefoot	
<i>Chenopodium fremontii</i>	Fremont's goosefoot	
<i>Chenopodium fremontii</i> var. <i>fremontii</i>	Fremont's goosefoot	
<i>Chenopodium glaucum</i>	Oakleaf goosefoot	
<i>Chenopodium graveolens</i>	Fetid goosefoot	
<i>Chenopodium leptophyllum</i>	Narrowleaf goosefoot	
<i>Chenopodium pratericola</i>	Desert goosefoot	
<i>Chenopodium rubrum</i>	Red goosefoot	
<i>Chenopodium watsonii</i>	Watson's goosefoot	
<i>Chionophila jamesii</i>	Rocky Mountain snowlover	
<i>Chrysothamnus greenii</i>	Greene's rabbitbrush	
<i>Chrysothamnus vaseyi</i>	Vasey's rabbitbrush	
<i>Chrysothamnus viscidiflorus</i>	Yellow rabbitbrush	
<i>Chrysothamnus viscidiflorus</i> ssp. <i>lanceolatus</i>	Yellow rabbitbrush	
<i>Cicuta maculata</i>	Spotted water hemlock	
<i>Cirsium arvense</i>	Canada thistle	
<i>Cirsium canescens</i>	Prairie thistle	
<i>Cirsium centaureae</i>	Fringed thistle	
<i>Cirsium ochrocentrum</i>	Yellowspine thistle	
<i>Cirsium ochrocentrum</i> ssp. <i>ochrocentrum</i>	Yellowspine thistle	
<i>Cirsium pallidum</i>	Pale thistle	
<i>Cirsium parryi</i>	Parry's thistle	
<i>Cirsium parryi</i> ssp. <i>parryi</i>	Parry's thistle	
<i>Cirsium scariosum</i>	Meadow thistle	
<i>Cirsium scopulorum</i>	Mountain thistle	
<i>Claytonia megarhiza</i>	Alpine springbeauty	
<i>Claytonia megarhiza</i> var. <i>megarhiza</i>	Alpine springbeauty	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Clematis columbiana</i>	Rock clematis	
<i>Clematis columbiana</i> var. <i>columbiana</i>	Rock clematis	
<i>Clematis hirsutissima</i>	Hairy clematis	
<i>Clematis hirsutissima</i> var. <i>scottii</i>	Scott's clematis	
<i>Clematis ligusticifolia</i>	Western white clematis	
<i>Clematis ligusticifolia</i> var. <i>ligusticifolia</i>	Western white clematis	
<i>Cleome multicaulis</i>	Slender spiderflower	
<i>Cleome serrulata</i>	Rocky Mountain beehplant	
<i>Collomia linearis</i>	Tiny trumpet	
<i>Comandra umbellata</i>	Bastard toadflax	
<i>Comandra umbellata</i> ssp. <i>pallida</i>	Pale bastard toadflax	
<i>Comarum palustre</i>	Purple marshlocks	
<i>Conioselinum scopulorum</i>	Rocky Mountain hemlockparsley	
<i>Convolvulus arvensis</i>	Field bindweed	
<i>Conyza canadensis</i>	Canadian horseweed	
<i>Corallorhiza maculata</i>	Summer coralroot	
<i>Corallorhiza striata</i>	Hooded coralroot	
<i>Corallorhiza trifida</i>	Yellow coralroot	
<i>Coreopsis tinctoria</i>	Golden tickseed	
<i>Coreopsis tinctoria</i> var. <i>tinctoria</i>	Golden tickseed	
<i>Corispermum americanum</i>	American bugseed	
<i>Corispermum americanum</i> var. <i>rydbergii</i>	American bugseed	
<i>Corispermum villosum</i>	Hairy bugseed	
<i>Cornus canadensis</i>	Bunchberry dogwood	
<i>Cornus sericea</i>	Redosier dogwood	
<i>Cornus sericea</i> ssp. <i>sericea</i>	Redosier dogwood	
<i>Corydalis aurea</i>	Scrambled eggs	
<i>Corydalis caseana</i>	Sierra fumewort	
<i>Corydalis caseana</i> ssp. <i>brandegeei</i>	Brandegee's fumewort	
<i>Corydalis curvisiliqua</i>	Curvepod fumewort	
<i>Corydalis curvisiliqua</i> ssp. <i>occidentalis</i>	Curvepod fumewort	
<i>Crataegus rivularis</i>	River hawthorn	
<i>Crepis occidentalis</i>	Largeflower hawksbeard	
<i>Crepis occidentalis</i> ssp. <i>occidentalis</i>	Largeflower hawksbeard	
<i>Crepis runcinata</i>	Fiddleleaf hawksbeard	
<i>Crepis runcinata</i> ssp. <i>runcinata</i>	Fiddleleaf hawksbeard	
<i>Cryptantha bakeri</i>	Baker's cryptantha	
<i>Cryptantha cinerea</i>	James' cryptantha	
<i>Cryptantha cinerea</i> var. <i>jamesii</i>	James' cryptantha	
<i>Cryptantha cinerea</i> var. <i>pustulosa</i>	James' cryptantha	
<i>Cryptantha fendleri</i>	Sanddune cryptantha	
<i>Cryptantha minima</i>	Little cryptantha	
<i>Cryptantha weberi</i>	Weber's cryptantha	
<i>Cryptogramma acrostichoides</i>	American rockbrake	
<i>Cycloloma atriplicifolium</i>	Winged pigweed	
<i>Cymopterus acaulis</i>	Plains springparsley	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Cymopterus montanus</i>	Mountain springparsley	
<i>Cynoglossum officinale</i>	Gypsyflower	
<i>Cyperus squarrosus</i>	Bearded flatsedge	
<i>Cystopteris fragilis</i>	Brittle bladderfern	
<i>Cystopteris reevesiana</i>	Reeves' bladderfern	
<i>Dalea leporina</i>	Foxtail prairie clover	
<i>Danthonia californica</i>	California oatgrass	
<i>Danthonia intermedia</i>	Timber oatgrass	
<i>Danthonia parryi</i>	Parry's oatgrass	
<i>Dasiphora fruticosa</i>	Shrubby cinquefoil	
<i>Dasiphora fruticosa</i> ssp. <i>floribunda</i>	Shrubby cinquefoil	
<i>Delphinium alpestre</i>	Colorado larkspur	
<i>Delphinium barbeyi</i>	Subalpine larkspur	
<i>Delphinium nuttallianum</i>	Twolobe larkspur	
<i>Delphinium ramosum</i>	Mountain larkspur	
<i>Delphinium robustum</i>	Wahatoya Creek larkspur	
<i>Deschampsia cespitosa</i>	Tufted hairgrass	
<i>Descurainia incana</i>	Mountain tansymustard	
<i>Descurainia incana</i> ssp. <i>incisa</i>	Mountain tansymustard	
<i>Descurainia incana</i> ssp. <i>viscosa</i>	Mountain tansymustard	
<i>Descurainia pinnata</i>	Western tansymustard	
<i>Descurainia pinnata</i> ssp. <i>filipes</i>	Western tansymustard	
<i>Descurainia ramosissima</i>	Villa Grove tansymustard	
<i>Distichlis spicata</i>	Saltgrass	
<i>Dodecatheon pulchellum</i>	Darkthroat shootingstar	
<i>Dodecatheon pulchellum</i> ssp. <i>pulchellum</i>	Darkthroat shootingstar	
<i>Draba aurea</i>	Golden draba	
<i>Draba crassa</i>	Thickleaf draba	
<i>Draba crassifolia</i>	Snowbed draba	
<i>Draba fladnizensis</i>	Austrian draba	
<i>Draba grayana</i>	Gray's draba	
<i>Draba helleriana</i>	Heller's draba	
<i>Draba helleriana</i> var. <i>helleriana</i>	Heller's draba	
<i>Draba rectifruca</i>	Mountain draba	
<i>Draba smithii</i>	Smith's draba	
<i>Draba spectabilis</i>	Showy draba	
<i>Draba streptobrachia</i>	Alpine tundra draba	
<i>Draba streptocarpa</i>	Pretty draba	
<i>Dracocephalum parviflorum</i>	American dragonhead	
<i>Dryas octopetala</i>	Eightpetal mountain-avens	
<i>Dryas octopetala</i> ssp. <i>hookeriana</i>	Hooker's mountain-avens	
<i>Dryopteris filix-mas</i>	Male fern	
<i>Dyssodia papposa</i>	Fetid marigold	
<i>Echinocereus triglochidiatus</i>	Kingcup cactus	
<i>Echinocereus triglochidiatus</i> var. <i>triglochidiatus</i>	Kingcup cactus	
<i>Echinocereus viridiflorus</i>	Nylon hedgehog cactus	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Echinocereus viridiflorus</i> var. <i>viridiflorus</i>	Nylon hedgehog cactus	
<i>Echinochloa crus-galli</i>	Barnyardgrass	
<i>Echinocystis lobata</i>	Wild cucumber	
<i>Elaeagnus commutata</i>	Silverberry	
<i>Eleocharis acicularis</i>	Needle spikerush	
<i>Eleocharis palustris</i>	Common spikerush	
<i>Eleocharis palustris</i> var. <i>palustris</i>	Common spikerush	
<i>Eleocharis quinqueflora</i>	Fewflower spikerush	
× <i>Elyhordeum macounii</i>	Macoun's barley	
<i>Elymus canadensis</i>	Canada wildrye	
<i>Elymus elymoides</i>	Squirreltail	
<i>Elymus elymoides</i> ssp. <i>brevifolius</i>	Squirreltail	
<i>Elymus lanceolatus</i>	Thickspike wheatgrass	
<i>Elymus lanceolatus</i> ssp. <i>lanceolatus</i>	Thickspike wheatgrass	
<i>Elymus repens</i>	Quackgrass	
<i>Elymus scribneri</i>	Spreading wheatgrass	
<i>Elymus trachycaulus</i>	Slender wheatgrass	
<i>Elymus trachycaulus</i> ssp. <i>trachycaulus</i>	Slender wheatgrass	
<i>Epilobium brachycarpum</i>	Tall annual willowherb	
<i>Epilobium ciliatum</i>	Fringed willowherb	
<i>Epilobium ciliatum</i> ssp. <i>glandulosum</i>	Fringed willowherb	
<i>Epilobium halleanum</i>	Glandular willowherb	
<i>Epilobium hornemannii</i>	Hornemann's willowherb	
<i>Epilobium hornemannii</i> ssp. <i>hornemannii</i>	Hornemann's willowherb	
<i>Epilobium saximontanum</i>	Rocky Mountain willowherb	
<i>Equisetum arvense</i>	Field horsetail	
<i>Equisetum hyemale</i>	Scouringrush horsetail	
<i>Equisetum hyemale</i> var. <i>affine</i>	Scouringrush horsetail	
<i>Equisetum laevigatum</i>	Smooth horsetail	
<i>Equisetum pratense</i>	Meadow horsetail	
<i>Equisetum variegatum</i>	Variegated scouringrush	
<i>Equisetum variegatum</i> var. <i>variegatum</i>	Variegated scouringrush	
<i>Eragrostis pilosa</i>	Indian lovegrass	
<i>Ericameria nauseosa</i>	Rubber rabbitbrush	
<i>Ericameria nauseosa</i> ssp. <i>consimilis</i>	Rubber rabbitbrush	
<i>Ericameria nauseosa</i> ssp. <i>consimilis</i> var. <i>oreophila</i>	Rubber rabbitbrush	
<i>Ericameria nauseosa</i> ssp. <i>nauseosa</i>	Rubber rabbitbrush	
<i>Ericameria nauseosa</i> ssp. <i>nauseosa</i> var. <i>bigelovii</i>	Rubber rabbitbrush	
<i>Ericameria nauseosa</i> ssp. <i>nauseosa</i> var. <i>glabrata</i>	Rubber rabbitbrush	
<i>Ericameria nauseosa</i> ssp. <i>nauseosa</i> var. <i>nauseosa</i>	Rubber rabbitbrush	
<i>Ericameria parryi</i>	Parry's rabbitbrush	
<i>Ericameria parryi</i> var. <i>affinis</i>	Parry's rabbitbrush	
<i>Ericameria parryi</i> var. <i>parryi</i>	Parry's rabbitbrush	
<i>Erigeron acris</i>	Bitter fleabane	
<i>Erigeron acris</i> ssp. <i>debilis</i>	Bitter fleabane	
<i>Erigeron acris</i> ssp. <i>politus</i>	Bitter fleabane	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Erigeron canus</i>	Hoary fleabane	
<i>Erigeron colomexicanus</i>	Running fleabane	
<i>Erigeron compositus</i>	Cutleaf daisy	
<i>Erigeron coulteri</i>	Large mountain fleabane	
<i>Erigeron divergens</i>	Spreading fleabane	
<i>Erigeron elatior</i>	Tall fleabane	
<i>Erigeron engelmannii</i>	Engelmann's fleabane	
<i>Erigeron engelmannii</i> var. <i>engelmannii</i>	Engelmann's fleabane	
<i>Erigeron eximius</i>	Sprucefir fleabane	
<i>Erigeron flagellaris</i>	Trailing fleabane	
<i>Erigeron formosissimus</i>	Beautiful fleabane	
<i>Erigeron glabellus</i>	Streamside fleabane	
<i>Erigeron leiomerus</i>	Rockslide yellow fleabane	
<i>Erigeron lonchophyllus</i>	Shortray fleabane	
<i>Erigeron melanocephalus</i>	Blackhead fleabane	
<i>Erigeron peregrinus</i>	Subalpine fleabane	
<i>Erigeron peregrinus</i> ssp. <i>callianthemus</i>	Subalpine fleabane	
<i>Erigeron peregrinus</i> ssp. <i>callianthemus</i> var. <i>callianthemus</i>	Subalpine fleabane	
<i>Erigeron philadelphicus</i>	Philadelphia fleabane	
<i>Erigeron philadelphicus</i> var. <i>philadelphicus</i>	Philadelphia fleabane	
<i>Erigeron pinnatisectus</i>	Featherleaf fleabane	
<i>Erigeron pumilus</i>	Shaggy fleabane	
<i>Erigeron pumilus</i> ssp. <i>pumilus</i>	Shaggy fleabane	
<i>Erigeron simplex</i>	Onestem fleabane	
<i>Erigeron speciosus</i>	Aspen fleabane	
<i>Erigeron speciosus</i> var. <i>speciosus</i>	Aspen fleabane	
<i>Erigeron subtrinervis</i>	Threenerve fleabane	
<i>Erigeron subtrinervis</i> var. <i>subtrinervis</i>	Threenerve fleabane	
<i>Erigeron ursinus</i>	Bear River fleabane	
<i>Erigeron vetensis</i>	Early bluetop fleabane	
<i>Erigeron vreelandii</i>	Vreeland's erigeron	
<i>Eriodictyon angustifolium</i>	Narrowleaf yerba santa	
<i>Eriogonum alatum</i>	Winged buckwheat	
<i>Eriogonum alatum</i> var. <i>alatum</i>	Winged buckwheat	
<i>Eriogonum cernuum</i>	Nodding buckwheat	
<i>Eriogonum cernuum</i> var. <i>cernuum</i>	Nodding buckwheat	
<i>Eriogonum coloradense</i>	Colorado buckwheat	
<i>Eriogonum effusum</i>	Spreading buckwheat	
<i>Eriogonum effusum</i> var. <i>effusum</i>	Spreading buckwheat	
<i>Eriogonum jamesii</i>	James' buckwheat	
<i>Eriogonum jamesii</i> var. <i>flavescens</i>	James' buckwheat	
<i>Eriogonum jamesii</i> var. <i>jamesii</i>	James' buckwheat	
<i>Eriogonum jamesii</i> var. <i>xanthum</i>	James' buckwheat	
<i>Eriogonum lachnogynum</i>	Woollycup buckwheat	
<i>Eriogonum microthecum</i>	Slender buckwheat	
<i>Eriogonum racemosum</i>	Redroot buckwheat	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Eriogonum umbellatum</i>	Sulphur-flower buckwheat	
<i>Eriogonum umbellatum</i> var. <i>aureum</i>	Sulphur-flower buckwheat	
<i>Eriogonum umbellatum</i> var. <i>majus</i>	Sulphur-flower buckwheat	
<i>Eriogonum umbellatum</i> var. <i>umbellatum</i>	Sulphur-flower buckwheat	
<i>Eriophorum angustifolium</i>	Tall cottongrass	
<i>Eriophorum angustifolium</i> ssp. <i>angustifolium</i>	Tall cottongrass	
<i>Eritrichium nanum</i>	Arctic alpine forget-me-not	
<i>Erysimum capitatum</i>	Sanddune wallflower	
<i>Erysimum capitatum</i> var. <i>capitatum</i>	Sanddune wallflower	
<i>Erysimum cheiranthoides</i>	Wormseed wallflower	
<i>Erysimum inconspicuum</i>	Shy wallflower	
<i>Erysimum inconspicuum</i> var. <i>inconspicuum</i>	Shy wallflower	
<i>Escobaria vivipara</i>	Spinystar	
<i>Escobaria vivipara</i> var. <i>vivipara</i>	Spinystar	
<i>Euphorbia brachycera</i>	Horned spurge	
<i>Euthamia graminifolia</i>	Flat-top goldentop	
<i>Euthamia graminifolia</i> var. <i>graminifolia</i>	Flat-top goldentop	
<i>Euthamia occidentalis</i>	Western goldentop	
<i>Fallugia paradoxa</i>	Apache plume	
<i>Festuca arizonica</i>	Arizona fescue	
<i>Festuca brachyphylla</i>	Alpine fescue	
<i>Festuca brachyphylla</i> ssp. <i>coloradensis</i>	Colorado fescue	
<i>Festuca earlei</i>	Earle's fescue	
<i>Festuca idahoensis</i>	Idaho fescue	
<i>Festuca idahoensis</i> ssp. <i>idahoensis</i>	Idaho fescue	
<i>Festuca minutiflora</i>	Smallflower fescue	
<i>Festuca rubra</i>	Red fescue	
<i>Festuca saximontana</i>	Rocky Mountain fescue	
<i>Festuca sororia</i>	Ravine fescue	
<i>Festuca thurberi</i>	Thurber's fescue	
<i>Fragaria vesca</i>	Woodland strawberry	
<i>Fragaria vesca</i> ssp. <i>bracteata</i>	Woodland strawberry	
<i>Fragaria virginiana</i>	Virginia strawberry	
<i>Fragaria virginiana</i> ssp. <i>glauca</i>	Virginia strawberry	
<i>Frasera speciosa</i>	Elkweed	
<i>Gaillardia aristata</i>	Blanketflower	
<i>Galium boreale</i>	Northern bedstraw	
<i>Galium trifidum</i>	Threepetal bedstraw	
<i>Galium trifidum</i> ssp. <i>subbiflorum</i>	Threepetal bedstraw	
<i>Gaura coccinea</i>	Scarlet beeblossom	
<i>Gayophytum diffusum</i>	Spreading groundsmoke	
<i>Gayophytum diffusum</i> ssp. <i>parviflorum</i>	Spreading groundsmoke	
<i>Gayophytum ramosissimum</i>	Pinyon groundsmoke	
<i>Gentiana affinis</i>	Pleated gentian	
<i>Gentiana algida</i>	Whitish gentian	
<i>Gentiana fremontii</i>	Moss gentian	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Gentiana parryi</i>	Parry's gentian	
<i>Gentiana prostrata</i>	Pygmy gentian	
<i>Gentianella amarella</i>	Autumn dwarf gentian	
<i>Gentianella amarella</i> ssp. <i>acuta</i>	Autumn dwarf gentian	
<i>Gentianella amarella</i> ssp. <i>heterosepala</i>	Autumn dwarf gentian	
<i>Gentianella tenella</i>	Dane's dwarf gentian	
<i>Gentianella tenella</i> ssp. <i>tenella</i>	Dane's dwarf gentian	
<i>Gentianopsis barbellata</i>	Perennial fringed gentian	
<i>Gentianopsis thermalis</i>	Rocky Mountain fringed gentian	
<i>Geranium caespitosum</i>	Pineywoods geranium	
<i>Geranium caespitosum</i> var. <i>caespitosum</i>	Pineywoods geranium	
<i>Geranium richardsonii</i>	Richardson's geranium	
<i>Geum aleppicum</i>	Yellow avens	
<i>Geum macrophyllum</i>	Largeleaf avens	
<i>Geum macrophyllum</i> var. <i>perincisum</i>	Largeleaf avens	
<i>Geum rivale</i>	Purple avens	
<i>Geum rossii</i>	Ross' avens	
<i>Geum rossii</i> var. <i>turbinatum</i>	Ross' avens	
<i>Geum triflorum</i>	Old man's whiskers	
<i>Geum triflorum</i> var. <i>triflorum</i>	Old man's whiskers	
<i>Glaux maritima</i>	Sea milkwort	
<i>Glyceria grandis</i>	American mannagrass	
<i>Glyceria grandis</i> var. <i>grandis</i>	American mannagrass	
<i>Glyceria striata</i>	Fowl mannagrass	
<i>Glycyrrhiza lepidota</i>	American licorice	
<i>Gnaphalium uliginosum</i>	Marsh cudweed	
<i>Goodyera oblongifolia</i>	Western rattlesnake plantain	
<i>Goodyera repens</i>	Lesser rattlesnake plantain	
<i>Gratiola neglecta</i>	Clammy hedgehyssop	
<i>Grindelia decumbens</i>	Reclined gumweed	
<i>Grindelia decumbens</i> var. <i>decumbens</i>	Reclined gumweed	
<i>Grindelia nuda</i>	Curlytop gumweed	
<i>Grindelia nuda</i> var. <i>aphanactis</i>	Curlytop gumweed	
<i>Grindelia squarrosa</i>	Curlycup gumweed	
<i>Gutierrezia sarothrae</i>	Broom snakeweed	
<i>Gymnocarpium dryopteris</i>	Western oakfern	
<i>Hackelia floribunda</i>	Manyflower stickseed	
<i>Halogeton glomeratus</i>	Saltlover	
<i>Hedysarum occidentale</i>	Western sweetvetch	
<i>Helianthella parryi</i>	Parry's dwarf-sunflower	
<i>Helianthella quinquenervis</i>	Fivenerve helianthella	
<i>Helianthus annuus</i>	Common sunflower	
<i>Helianthus nuttallii</i>	Nuttall's sunflower	
<i>Helianthus petiolaris</i>	Prairie sunflower	
<i>Heliomeris multiflora</i>	Showy goldeneye	
<i>Heliotropium curassavicum</i>	Salt heliotrope	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Heliotropium curassavicum</i> var. <i>obovatum</i>	Seaside heliotrope	
<i>Heracleum maximum</i>	Common cowparsnip	
<i>Hesperostipa comata</i>	Needle and thread	
<i>Hesperostipa comata</i> ssp. <i>comata</i>	Needle and thread	
<i>Hesperostipa neomexicana</i>	New Mexico feathergrass	
<i>Heterotheca fulcrata</i>	Rockyscree false goldenaster	
<i>Heterotheca pumila</i>	Alpine false goldenaster	
<i>Heterotheca villosa</i>	Hairy false goldenaster	
<i>Heterotheca villosa</i> var. <i>minor</i>	Hairy false goldenaster	
<i>Heterotheca villosa</i> var. <i>nana</i>	Hairy false goldenaster	
<i>Heterotheca villosa</i> var. <i>villosa</i>	Hairy false goldenaster	
<i>Heuchera parvifolia</i>	Littleleaf alumroot	
<i>Heuchera parvifolia</i> var. <i>parvifolia</i>	Littleleaf alumroot	
<i>Hieracium gracile</i>	Slender hawkweed	
<i>Hieracium gracile</i> var. <i>gracile</i>	Slender hawkweed	
<i>Hierochloe hirta</i>	Northern sweetgrass	
<i>Hierochloe hirta</i> ssp. <i>arctica</i>	Northern sweetgrass	
<i>Hoffmannseggia glauca</i>	Indian rushpea	
<i>Holodiscus dumosus</i>	Rockspirea	
<i>Hordeum brachyantherum</i>	Meadow barley	
<i>Hordeum brachyantherum</i> ssp. <i>brachyantherum</i>	Meadow barley	
<i>Hordeum jubatum</i>	Foxtail barley	
<i>Hordeum jubatum</i> ssp. <i>jubatum</i>	Foxtail barley	
<i>Humulus lupulus</i>	Common hop	
<i>Humulus lupulus</i> var. <i>neomexicanus</i>	Common hop	
<i>Hydrophyllum fendleri</i>	Fendler's waterleaf	
<i>Hydrophyllum fendleri</i> var. <i>fendleri</i>	Fendler's waterleaf	
<i>Hymenopappus filifolius</i>	Fineleaf hymenopappus	
<i>Hymenopappus filifolius</i> var. <i>cinereus</i>	Fineleaf hymenopappus	
<i>Hymenopappus filifolius</i> var. <i>parvulus</i>	Fineleaf hymenopappus	
<i>Hymenopappus newberryi</i>	Newberry's hymenopappus	
<i>Hymenoxys helenioides</i>	Intermountain rubberweed	
<i>Hymenoxys hoopesii</i>	Owl's-claws	
<i>Hymenoxys richardsonii</i>	Pingue rubberweed	
<i>Hymenoxys richardsonii</i> var. <i>richardsonii</i>	Pingue rubberweed	
<i>Hyoscyamus niger</i>	Black henbane	
<i>Hypericum scouleri</i>	Scouler's St. Johnswort	
<i>Hypericum scouleri</i> ssp. <i>nortoniae</i>	Norton's St. Johnswort	
<i>Ipomopsis aggregata</i>	Scarlet gilia	
<i>Ipomopsis aggregata</i> ssp. <i>candida</i>	Scarlet gilia	
<i>Ipomopsis aggregata</i> ssp. <i>collina</i>	Scarlet gilia	
<i>Ipomopsis longiflora</i>	Flaxflowered ipomopsis	
<i>Ipomopsis longiflora</i> ssp. <i>longiflora</i>	Flaxflowered ipomopsis	
<i>Ipomopsis multiflora</i>	Manyflowered ipomopsis	
<i>Iris missouriensis</i>	Rocky Mountain iris	
<i>Iva axillaris</i>	Povertyweed	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Ivesia gordonii</i>	Gordon's ivesia	
<i>Jamesia americana</i>	Fivepetal cliffbush	
<i>Jamesia americana</i> var. <i>americana</i>	Fivepetal cliffbush	
<i>Juncus arcticus</i>	Arctic rush	
<i>Juncus arcticus</i> ssp. <i>littoralis</i>	Mountain rush	
<i>Juncus bufonius</i>	Toad rush	
<i>Juncus bufonius</i> var. <i>bufonius</i>	Toad rush	
<i>Juncus castaneus</i>	Chestnut rush	
<i>Juncus castaneus</i> ssp. <i>castaneus</i>	Chestnut rush	
<i>Juncus castaneus</i> ssp. <i>castaneus</i> var. <i>castaneus</i>	Chestnut rush	
<i>Juncus drummondii</i>	Drummond's rush	
<i>Juncus interior</i>	Inland rush	
<i>Juncus longistylis</i>	Longstyle rush	
<i>Juncus longistylis</i> var. <i>longistylis</i>	Longstyle rush	
<i>Juncus mertensianus</i>	Mertens' rush	
<i>Juncus saximontanus</i>	Rocky Mountain rush	
<i>Juncus torreyi</i>	Torrey's rush	
<i>Juniperus communis</i>	Common juniper	
<i>Juniperus communis</i> var. <i>depressa</i>	Common juniper	
<i>Juniperus scopulorum</i>	Rocky Mountain juniper	
<i>Kalmia microphylla</i>	Alpine laurel	
<i>Kobresia myosuroides</i>	Bellardi bog sedge	
<i>Koeleria macrantha</i>	Prairie Junegrass	
<i>Krascheninnikovia lanata</i>	Winterfat	
<i>Lactuca tatarica</i>	Blue lettuce	
<i>Lactuca tatarica</i> var. <i>pulchella</i>	Blue lettuce	
<i>Lappula occidentalis</i>	Flatspine stickseed	
<i>Lappula occidentalis</i> var. <i>occidentalis</i>	Flatspine stickseed	
<i>Lathyrus eucosmus</i>	Bush vetchling	
<i>Lathyrus lanszwertii</i>	Nevada pea	
<i>Lathyrus lanszwertii</i> var. <i>leucanthus</i>	Nevada pea	
<i>Lathyrus latifolius</i>	Perennial pea	
<i>Lemna minuta</i>	Least duckweed	
<i>Lemna turionifera</i>	Turion duckweed	
<i>Lepidium alyssoides</i>	Mesa pepperwort	
<i>Lepidium alyssoides</i> var. <i>alyssoides</i>	Mesa pepperwort	
<i>Lepidium densiflorum</i>	Common pepperweed	
<i>Lepidium latifolium</i>	Broadleaved pepperweed	
<i>Lepidium ramosissimum</i>	Manybranched pepperweed	
<i>Leptochloa fusca</i>	Malabar sprangletop	
<i>Leptochloa fusca</i> ssp. <i>fascicularis</i>	Bearded sprangletop	
<i>Leptosiphon nuttallii</i>	Nuttall's linanthus	
<i>Leptosiphon nuttallii</i> ssp. <i>nuttallii</i>	Nuttall's linanthus	
<i>Lesquerella montana</i>	Mountain bladderpod	
<i>Levisticum officinale</i>	Garden lovage	
<i>Lewisia pygmaea</i>	Alpine lewisia	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Leymus ambiguus</i>	Colorado wildrye	
<i>Leymus cinereus</i>	Basin wildrye	
<i>Leymus triticoides</i>	Beardless wildrye	
<i>Liatris punctata</i>	Dotted blazing star	
<i>Ligusticum porteri</i>	Porter's licorice-root	
<i>Ligusticum porteri</i> var. <i>porteri</i>	Porter's licorice-root	
<i>Limosella aquatica</i>	Water mudwort	
<i>Linanthus pungens</i>	Granite prickly phlox	
<i>Linnaea borealis</i>	Twinflower	
<i>Linnaea borealis</i> ssp. <i>americana</i>	Twinflower	
<i>Linum australe</i>	Southern flax	
<i>Linum australe</i> var. <i>australe</i>	Southern flax	
<i>Linum lewisii</i>	Lewis flax	
<i>Linum lewisii</i> var. <i>lewisii</i>	Prairie flax	
<i>Listera cordata</i>	Heartleaf twayblade	
<i>Listera cordata</i> var. <i>nephrophylla</i>	Heartleaf twayblade	
<i>Lithophragma tenellum</i>	Slender woodland-star	
<i>Lithospermum incisum</i>	Narrowleaf stoneseed	
<i>Lithospermum multiflorum</i>	Manyflowered stoneseed	
<i>Lloydia serotina</i>	Common alplily	
<i>Lloydia serotina</i> var. <i>serotina</i>	Common alplily	
<i>Lonicera involucrata</i>	Twinberry honeysuckle	
<i>Lonicera involucrata</i> var. <i>involucrata</i>	Twinberry honeysuckle	
<i>Lupinus argenteus</i>	Silvery lupine	
<i>Lupinus bakeri</i>	Baker's lupine	
<i>Lupinus bakeri</i> ssp. <i>bakeri</i>	Baker's lupine	
<i>Lupinus caespitosus</i>	Stemless dwarf lupine	
<i>Lupinus caespitosus</i> var. <i>caespitosus</i>	Stemless dwarf lupine	
<i>Lupinus caudatus</i>	Tailcup lupine	
<i>Lupinus kingii</i>	King's lupine	
<i>Lupinus pusillus</i>	Rusty lupine	
<i>Lupinus pusillus</i> ssp. <i>pusillus</i>	Rusty lupine	
<i>Lupinus sericeus</i>	Silky lupine	
<i>Lupinus sericeus</i> ssp. <i>sericeus</i>	Silky lupine	
<i>Luzula parviflora</i>	Smallflowered woodrush	
<i>Luzula spicata</i>	Spiked woodrush	
<i>Lycopus asper</i>	Rough bugleweed	
<i>Lygodesmia juncea</i>	Rush skeletonplant	
<i>Machaeranthera bigelovii</i>	Bigelow's tansyaster	
<i>Machaeranthera bigelovii</i> var. <i>bigelovii</i>	Bigelow's tansyaster	
<i>Machaeranthera canescens</i>	Hoary tansyaster	
<i>Machaeranthera canescens</i> ssp. <i>glabra</i>	Hoary tansyaster	
<i>Machaeranthera canescens</i> ssp. <i>glabra</i> var. <i>glabra</i>	Hoary tansyaster	
<i>Machaeranthera coloradoensis</i>	Colorado tansyaster	
<i>Machaeranthera coloradoensis</i> var. <i>coloradoensis</i>	Colorado tansyaster	
<i>Machaeranthera parviflora</i>	Smallflower tansyaster	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Machaeranthera pinnatifida</i>	Lacy tansyaster	
<i>Machaeranthera pinnatifida</i> ssp. <i>pinnatifida</i>	Lacy tansyaster	
<i>Machaeranthera pinnatifida</i> ssp. <i>pinnatifida</i> var. <i>pinnatifida</i>	Lacy tansyaster	
<i>Machaeranthera tanacetifolia</i>	Tanseyleaf tansyaster	
<i>Mahonia repens</i>	Creeping barberry	
<i>Maianthemum racemosum</i>	Feathery false lily of the valley	
<i>Maianthemum racemosum</i> ssp. <i>amplexicaule</i>	Feathery false lily of the valley	
<i>Maianthemum stellatum</i>	Starry false lily of the valley	
<i>Malva neglecta</i>	Common mallow	
<i>Marsilea vestita</i>	Hairy watercress	
<i>Medicago sativa</i>	Alfalfa	
<i>Medicago sativa</i> ssp. <i>sativa</i>	Alfalfa	
<i>Melilotus officinalis</i>	Sweetclover	
<i>Mentha arvensis</i>	Wild mint	
<i>Mentzelia albicaulis</i>	Whitestem blazingstar	
<i>Mentzelia multiflora</i>	Adonis blazingstar	
<i>Mentzelia multiflora</i> var. <i>multiflora</i>	Adonis blazingstar	
<i>Mentzelia nuda</i>	Bractless blazingstar	
<i>Mentzelia rusbyi</i>	Rusby's blazingstar	
<i>Mentzelia speciosa</i>	Jeweled blazingstar	
<i>Menyanthes trifoliata</i>	Buckbean	
<i>Mertensia alpina</i>	Alpine bluebells	
<i>Mertensia brevistyla</i>	Shortstyle bluebells	
<i>Mertensia ciliata</i>	Tall fringed bluebells	
<i>Mertensia ciliata</i> var. <i>ciliata</i>	Tall fringed bluebells	
<i>Mertensia franciscana</i>	Franciscan bluebells	
<i>Mertensia lanceolata</i>	Prairie bluebells	
<i>Mertensia lanceolata</i> var. <i>lanceolata</i>	Prairie bluebells	
<i>Mertensia oblongifolia</i>	Oblongleaf bluebells	
<i>Mimulus floribundus</i>	Manyflowered monkeyflower	
<i>Mimulus glabratus</i>	Roundleaf monkeyflower	
<i>Mimulus guttatus</i>	Seep monkeyflower	
<i>Minuartia obtusiloba</i>	Twinflower sandwort	
<i>Minuartia rubella</i>	Beautiful sandwort	
<i>Mirabilis linearis</i>	Narrowleaf four o'clock	
<i>Mirabilis multiflora</i>	Colorado four o'clock	
<i>Mirabilis oxybaphoides</i>	Smooth spreading four o'clock	
<i>Mitella pentandra</i>	Fivestamen miterwort	
<i>Mitella stauropetala</i>	Smallflower miterwort	
<i>Mitella stauropetala</i> var. <i>stenopetala</i>	Drywoods miterwort	
<i>Moehringia lateriflora</i>	Bluntleaf sandwort	
<i>Moehringia macrophylla</i>	Largeleaf sandwort	
<i>Monarda fistulosa</i>	Wild bergamot	
<i>Monarda fistulosa</i> ssp. <i>fistulosa</i>	Wild bergamot	
<i>Monarda fistulosa</i> ssp. <i>fistulosa</i> var. <i>menthifolia</i>	Mintleaf bergamot	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Monarda pectinata</i>	Pony beebalm	
<i>Moneses uniflora</i>	Single delight	
<i>Monolepis nuttalliana</i>	Nuttall's povertyweed	
<i>Monotropa hypopithys</i>	Pinesap	
<i>Montia chamissoi</i>	Water minerslettuce	
<i>Muhlenbergia andina</i>	Foxtail muhly	
<i>Muhlenbergia asperifolia</i>	Scratchgrass	
<i>Muhlenbergia brevis</i>	Short muhly	
<i>Muhlenbergia filiculmis</i>	Slimstem muhly	
<i>Muhlenbergia filiformis</i>	Pullup muhly	
<i>Muhlenbergia minutissima</i>	Annual muhly	
<i>Muhlenbergia montana</i>	Mountain muhly	
<i>Muhlenbergia pungens</i>	Sandhill muhly	
<i>Muhlenbergia richardsonis</i>	Mat muhly	
<i>Muhlenbergia torreyi</i>	Ring muhly	
<i>Munroa squarrosa</i>	False buffalograss	
<i>Myriophyllum sibiricum</i>	Shortspike watermilfoil	
<i>Nassella viridula</i>	Green needlegrass	
<i>Nasturtium officinale</i>	Watercress	
<i>Neoparrya lithophila</i>	Bill's neoparrya	
<i>Noccaea montana</i>	Alpine pennycress	
<i>Noccaea montana</i> var. <i>montana</i>	Alpine pennycress	
<i>Nuphar lutea</i>	Yellow pond-lily	
<i>Nuphar lutea</i> ssp. <i>polysepala</i>	Rocky Mountain pond-lily	
<i>Oenothera albicaulis</i>	Whitest evening primrose	
<i>Oenothera caespitosa</i>	Tufted evening primrose	
<i>Oenothera caespitosa</i> ssp. <i>caespitosa</i>	Tufted evening primrose	
<i>Oenothera coronopifolia</i>	Crownleaf evening primrose	
<i>Oenothera elata</i>	Hooker's evening primrose	
<i>Oenothera elata</i> ssp. <i>hirsutissima</i>	Hooker's evening primrose	
<i>Oenothera flava</i>	Yellow evening primrose	
<i>Oenothera flava</i> ssp. <i>flava</i>	Yellow evening primrose	
<i>Oenothera pallida</i>	Pale evening primrose	
<i>Oenothera pallida</i> ssp. <i>runcinata</i>	Pale evening primrose	
<i>Oenothera villosa</i>	Hairy evening primrose	
<i>Oenothera villosa</i> ssp. <i>strigosa</i>	Hairy evening primrose	
<i>Opuntia polyacantha</i>	Plains pricklypear	
<i>Opuntia polyacantha</i> var. <i>polyacantha</i>	Hairspine pricklypear	
<i>Oreochrysum parryi</i>	Parry's goldenrod	
<i>Oreoxis alpina</i>	Alpine oreoxis	
<i>Oreoxis alpina</i> ssp. <i>alpina</i>	Alpine oreoxis	
<i>Oreoxis alpina</i> ssp. <i>puberulenta</i>	Alpine oreoxis	
<i>Oreoxis bakeri</i>	Baker's alpineparsley	
<i>Orobanche fasciculata</i>	Clustered broomrape	
<i>Orthilia secunda</i>	Sidebells wintergreen	
<i>Orthocarpus luteus</i>	Yellow owl's-clover	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Oryzopsis asperifolia</i>	Roughleaf ricegrass	
<i>Osmorhiza depauperata</i>	Bluntseed sweetroot	
<i>Oxypolis fendleri</i>	Fendler's cowbane	
<i>Oxyria digyna</i>	Alpine mountainsorrel	
<i>Oxytropis campestris</i>	Field locoweed	
<i>Oxytropis deflexa</i>	Nodding locoweed	
<i>Oxytropis deflexa</i> var. <i>sericea</i>	Blue nodding locoweed	
<i>Oxytropis lambertii</i>	Purple locoweed	
<i>Oxytropis lambertii</i> var. <i>lambertii</i>	Purple locoweed	
<i>Oxytropis parryi</i>	Parry's oxytrope	
<i>Oxytropis sericea</i>	White locoweed	
<i>Oxytropis sericea</i> var. <i>sericea</i>	White locoweed	
<i>Oxytropis splendens</i>	Showy locoweed	
<i>Packera cana</i>	Woolly groundsel	
<i>Packera crocata</i>	Saffron ragwort	
<i>Packera dimorphophylla</i>	Splitleaf groundsel	
<i>Packera dimorphophylla</i> var. <i>intermedia</i>	Splitleaf groundsel	
<i>Packera fendleri</i>	Fendler's ragwort	
<i>Packera neomexicana</i>	New Mexico groundsel	
<i>Packera neomexicana</i> var. <i>mutabilis</i>	New Mexico groundsel	
<i>Packera pseud aurea</i>	Falsegold groundsel	
<i>Packera pseud aurea</i> var. <i>pseud aurea</i>	Falsegold groundsel	
<i>Packera streptanthifolia</i>	Rocky Mountain groundsel	
<i>Packera tridenticulata</i>	Threetooth ragwort	
<i>Packera wernerifolia</i>	Hoary groundsel	
<i>Parietaria pensylvanica</i>	Pennsylvania pellitory	
<i>Parnassia palustris</i>	Marsh grass of Parnassus	
<i>Parnassia palustris</i> var. <i>montanensis</i>	Mountain grass of Parnassus	
<i>Paronychia pulvinata</i>	Rocky Mountain nailwort	
<i>Paronychia sessiliflora</i>	Creeping nailwort	
<i>Parthenium tetraeuris</i>	Arkansas River feverfew	
<i>Pascopyrum smithii</i>	Western wheatgrass	
<i>Pastinaca sativa</i>	Wild parsnip	
<i>Paxistima myrsinites</i>	Oregon boxleaf	
<i>Pectis angustifolia</i>	Lemonscent	
<i>Pectis angustifolia</i> var. <i>angustifolia</i>	Narrowleaf pectis	
<i>Pedicularis canadensis</i>	Canadian lousewort	
<i>Pedicularis canadensis</i> ssp. <i>fluviatilis</i>	Canadian lousewort	
<i>Pedicularis crenulata</i>	Meadow lousewort	
<i>Pedicularis groenlandica</i>	Elephanthead lousewort	
<i>Pedicularis parryi</i>	Parry's lousewort	
<i>Pedicularis parryi</i> ssp. <i>parryi</i>	Parry's lousewort	
<i>Pedicularis procera</i>	Giant lousewort	
<i>Pedicularis racemosa</i>	Sickle-top lousewort	
<i>Pedicularis racemosa</i> ssp. <i>alba</i>	Sickle-top lousewort	
<i>Pediocactus simpsonii</i>	Mountain ball cactus	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Penstemon barbatus</i>	Beardlip penstemon	
<i>Penstemon caespitosus</i>	Mat penstemon	
<i>Penstemon griffinii</i>	Griffin's beardtongue	
<i>Penstemon hallii</i>	Hall's beardtongue	
<i>Penstemon procerus</i>	Littleflower penstemon	
<i>Penstemon procerus</i> var. <i>procerus</i>	Pincushion beardtongue	
<i>Penstemon rydbergii</i>	Rydberg's penstemon	
<i>Penstemon secundiflorus</i>	Sidebells penstemon	
<i>Penstemon strictus</i>	Rocky Mountain penstemon	
<i>Penstemon unilateralis</i>	Oneside penstemon	
<i>Penstemon whippleanus</i>	Whipple's penstemon	
<i>Pericome caudata</i>	Mountain tail-leaf	
<i>Petasites frigidus</i>	Arctic sweet coltsfoot	
<i>Petasites frigidus</i> var. <i>sagittatus</i>	Arrowleaf sweet coltsfoot	
<i>Phacelia alba</i>	White phacelia	
<i>Phacelia bakeri</i>	Baker's phacelia	
<i>Phacelia glandulosa</i>	Glandular phacelia	
<i>Phacelia glandulosa</i> var. <i>glandulosa</i>	Glandular phacelia	
<i>Phacelia heterophylla</i>	Varileaf phacelia	
<i>Phacelia heterophylla</i> ssp. <i>heterophylla</i>	Varileaf phacelia	
<i>Phacelia sericea</i>	Silky phacelia	
<i>Phacelia sericea</i> ssp. <i>sericea</i>	Silky phacelia	
<i>Phalaris arundinacea</i>	Reed canarygrass	
<i>Phleum alpinum</i>	Alpine timothy	
<i>Phleum pratense</i>	Timothy	
<i>Phlox austromontana</i>	Mountain phlox	
<i>Phlox condensata</i>	Dwarf phlox	
<i>Phlox hoodii</i>	Spiny phlox	
<i>Phlox pulvinata</i>	Cushion phlox	
<i>Physaria floribunda</i>	Oointtip twinpod	
<i>Physocarpus monogynus</i>	Mountain ninebark	
<i>Picea engelmannii</i>	Engelmann spruce	
<i>Picea engelmannii</i> var. <i>engelmannii</i>	Engelmann spruce	
<i>Picea pungens</i>	Blue spruce	
<i>Picradeniopsis oppositifolia</i>	Oppositeleaf bahia	
<i>Pinus aristata</i>	Bristlecone pine	
<i>Pinus edulis</i>	Twoneedle pinyon	
<i>Pinus flexilis</i>	Limber pine	
<i>Pinus ponderosa</i>	Ponderosa pine	
<i>Pinus ponderosa</i> var. <i>brachyptera</i>	Ponderosa pine	
<i>Pinus ponderosa</i> var. <i>scopulorum</i>	Ponderosa pine	
<i>Pinus strobiformis</i>	Southwestern white pine	
<i>Piptatherum micranthum</i>	Littleseed ricegrass	
<i>Piptatherum pungens</i>	Mountain ricegrass	
<i>Plagiobothrys scouleri</i>	Scouler's popcornflower	
<i>Plagiobothrys scouleri</i> var. <i>hispidulus</i>	Sleeping popcornflower	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Plantago eriopoda</i>	Redwool plantain	
<i>Plantago major</i>	Common plantain	
<i>Platanthera dilatata</i>	Scentbottle	
<i>Platanthera dilatata</i> var. <i>albiflora</i>	Scentbottle	
<i>Platanthera obtusata</i>	Bluntleaved orchid	
<i>Platanthera obtusata</i> ssp. <i>obtusata</i>	Bluntleaved orchid	
<i>Platanthera sparsiflora</i>	Sparse-flowered bog orchid	
<i>Platanthera sparsiflora</i> var. <i>ensifolia</i>	Sparse-flowered bog orchid	
<i>Poa alpina</i>	Alpine bluegrass	
<i>Poa annua</i>	Annual bluegrass	
<i>Poa arctica</i>	Arctic bluegrass	
<i>Poa arctica</i> ssp. <i>aperta</i>	Arctic bluegrass	
<i>Poa compressa</i>	Canada bluegrass	
<i>Poa fendleriana</i>	Muttongrass	
<i>Poa glauca</i>	Glaucous bluegrass	
<i>Poa glauca</i> ssp. <i>rupicola</i>	Timberline bluegrass	
<i>Poa leptocoma</i>	Marsh bluegrass	
<i>Poa lettermanii</i>	Letterman's bluegrass	
<i>Poa nemoralis</i>	Wood bluegrass	
<i>Poa nemoralis</i> ssp. <i>interior</i>	Inland bluegrass	
<i>Poa palustris</i>	Fowl bluegrass	
<i>Poa pratensis</i>	Kentucky bluegrass	
<i>Poa pratensis</i> ssp. <i>pratensis</i>	Kentucky bluegrass	
<i>Poa reflexa</i>	Nodding bluegrass	
<i>Poa secunda</i>	Sandberg bluegrass	
<i>Podistera eastwoodiae</i>	Eastwood's podistera	
<i>Polemonium brandegeei</i>	Brandegee's Jacob's-ladder	
<i>Polemonium confertum</i>	Rocky Mountain Jacob's-ladder	
<i>Polemonium foliosissimum</i>	Towering Jacob's-ladder	
<i>Polemonium occidentale</i>	Western polemonium	
<i>Polemonium occidentale</i> ssp. <i>occidentale</i>	Western polemonium	
<i>Polemonium pulcherrimum</i>	Jacob's-ladder	
<i>Polemonium pulcherrimum</i> ssp. <i>delicatum</i>	Jacob's-ladder	
<i>Polemonium viscosum</i>	Sticky polemonium	
<i>Polygonum amphibium</i>	Water knotweed	
<i>Polygonum amphibium</i> var. <i>emersum</i>	Longroot smartweed	
<i>Polygonum arenastrum</i>	Oval-leaf knotweed	
<i>Polygonum argyrocoleon</i>	Silversheath knotweed	
<i>Polygonum bistortoides</i>	American bistort	
<i>Polygonum douglasii</i>	Douglas' knotweed	
<i>Polygonum pensylvanicum</i>	Pennsylvania smartweed	
<i>Polygonum persicaria</i>	Spotted ladythumb	
<i>Polygonum viviparum</i>	Alpine bistort	
<i>Populus ×acuminata</i>	Lanceleaf cottonwood	
<i>Populus angustifolia</i>	Narrowleaf cottonwood	
<i>Populus tremuloides</i>	Quaking aspen	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Portulaca oleracea</i>	Little hogweed	
<i>Potamogeton alpinus</i>	Alpine pondweed	
<i>Potamogeton foliosus</i>	Leafy pondweed	
<i>Potamogeton foliosus</i> ssp. <i>foliosus</i>	Leafy pondweed	
<i>Potamogeton nodosus</i>	Longleaf pondweed	
<i>Potamogeton pusillus</i>	Small pondweed	
<i>Potamogeton pusillus</i> ssp. <i>pusillus</i>	Small pondweed	
<i>Potentilla ambigens</i>	Silkyleaf cinquefoil	
<i>Potentilla concinna</i>	Elegant cinquefoil	
<i>Potentilla concinna</i> var. <i>concinna</i>	Elegant cinquefoil	
<i>Potentilla diversifolia</i>	Varileaf cinquefoil	
<i>Potentilla diversifolia</i> var. <i>diversifolia</i>	Varileaf cinquefoil	
<i>Potentilla gracilis</i>	Slender cinquefoil	
<i>Potentilla hippiana</i>	Woolly cinquefoil	
<i>Potentilla hippiana</i> var. <i>hippiana</i>	Woolly cinquefoil	
<i>Potentilla norvegica</i>	Norwegian cinquefoil	
<i>Potentilla norvegica</i> ssp. <i>monspeliensis</i>	Norwegian cinquefoil	
<i>Potentilla paradoxa</i>	Paradox cinquefoil	
<i>Potentilla pensylvanica</i>	Pennsylvania cinquefoil	
<i>Potentilla pensylvanica</i> var. <i>pensylvanica</i>	Pennsylvania cinquefoil	
<i>Potentilla plattensis</i>	Platte River cinquefoil	
<i>Potentilla pulcherrima</i>	Beautiful cinquefoil	
<i>Potentilla rivalis</i>	Brook cinquefoil	
<i>Potentilla subjuga</i>	Colorado cinquefoil	
<i>Potentilla uniflora</i>	Oneflower cinquefoil	
<i>Primula angustifolia</i>	Alpine primrose	
<i>Primula parryi</i>	Parry's primrose	
<i>Prunella vulgaris</i>	Common selfheal	
<i>Prunella vulgaris</i> ssp. <i>lanceolata</i>	Lance selfheal	
<i>Prunus pensylvanica</i>	Pin cherry	
<i>Prunus pensylvanica</i> var. <i>pensylvanica</i>	Pin cherry	
<i>Prunus virginiana</i>	Chokecherry	
<i>Prunus virginiana</i> var. <i>melanocarpa</i>	Black chokecherry	
<i>Psathyrostachys juncea</i>	Russian wildrye	
<i>Pseudocymopterus montanus</i>	Alpine false springparsley	
<i>Pseudotsuga menziesii</i>	Douglas-fir	
<i>Pseudotsuga menziesii</i> var. <i>glauca</i>	Rocky Mountain Douglas-fir	
<i>Psoralidium lanceolatum</i>	Lemon scurfpea	
<i>Pteridium aquilinum</i>	Western brackenfern	
<i>Pteridium aquilinum</i> var. <i>pubescens</i>	Hairy brackenfern	
<i>Pterospora andromedea</i>	Woodland pinedrops	
<i>Pteryxia hendersonii</i>	Henderson's wavewing	
<i>Puccinellia nuttalliana</i>	Nuttall's alkaligrass	
<i>Pulsatilla patens</i>	Eastern pasqueflower	
<i>Pulsatilla patens</i> ssp. <i>multifida</i>	Cutleaf anemone	
<i>Pyrola asarifolia</i>	Liverleaf wintergreen	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Pyrola asarifolia</i> ssp. <i>asarifolia</i>	Liverleaf wintergreen	
<i>Pyrola chlorantha</i>	Greenflowered wintergreen	
<i>Pyrola minor</i>	Snowline wintergreen	
<i>Pyrocoma clementis</i>	Tranquil goldenweed	
<i>Pyrocoma clementis</i> var. <i>clementis</i>	Tranquil goldenweed	
<i>Pyrocoma lanceolata</i>	Lanceleaf goldenweed	
<i>Pyrocoma lanceolata</i> var. <i>lanceolata</i>	Lanceleaf goldenweed	
<i>Pyrocoma uniflora</i>	Plantain goldenweed	
<i>Pyrocoma uniflora</i> var. <i>uniflora</i>	Plantain goldenweed	
<i>Quercus gambelii</i>	Gambel oak	
<i>Quercus gambelii</i> var. <i>gambelii</i>	Gambel oak	
<i>Ranunculus abortivus</i>	Littleleaf buttercup	
<i>Ranunculus alismifolius</i>	Plantainleaf buttercup	
<i>Ranunculus alismifolius</i> var. <i>montanus</i>	Waterplantain buttercup	
<i>Ranunculus cardiophyllus</i>	Heartleaf buttercup	
<i>Ranunculus cymbalaria</i>	Alkali buttercup	
<i>Ranunculus gmelinii</i>	Gmelin's buttercup	
<i>Ranunculus hyperboreus</i>	High northern buttercup	
<i>Ranunculus inamoenus</i>	Graceful buttercup	
<i>Ranunculus macauleyi</i>	Rocky Mountain buttercup	
<i>Ranunculus macounii</i>	Macoun's buttercup	
<i>Ranunculus sceleratus</i>	Cursed buttercup	
<i>Ranunculus sceleratus</i> var. <i>multifidus</i>	Cursed buttercup	
<i>Ranunculus sceleratus</i> var. <i>sceleratus</i>	Cursed buttercup	
<i>Ranunculus trichophyllus</i>	Threadleaf crowfoot	
<i>Ranunculus trichophyllus</i> var. <i>trichophyllus</i>	Threadleaf crowfoot	
<i>Ranunculus uncinatus</i>	Woodland buttercup	
<i>Redfieldia flexuosa</i>	Blowout grass	
<i>Rhinanthus minor</i>	Little yellow rattle	
<i>Rhinanthus minor</i> ssp. <i>minor</i>	Little yellow rattle	
<i>Rhodiola integrifolia</i>	Ledge stonecrop	
<i>Rhodiola rhodantha</i>	Redpod stonecrop	
<i>Rhus trilobata</i>	Skunkbush sumac	
<i>Rhus trilobata</i> var. <i>trilobata</i>	Skunkbush sumac	
<i>Ribes aureum</i>	Golden currant	
<i>Ribes cereum</i>	Wax currant	
<i>Ribes cereum</i> var. <i>pedicellare</i>	Whisky currant	
<i>Ribes inerme</i>	Whitestem gooseberry	
<i>Ribes inerme</i> var. <i>inerme</i>	Whitestem gooseberry	
<i>Ribes laxiflorum</i>	Trailing black currant	
<i>Ribes leptanthum</i>	Trumpet gooseberry	
<i>Ribes montigenum</i>	Gooseberry currant	
<i>Ribes wolfii</i>	Wolf's currant	
<i>Rorippa alpina</i>	Alpine yellowcress	
<i>Rorippa curvipes</i>	Bluntleaf yellowcress	
<i>Rorippa curvipes</i> var. <i>curvipes</i>	Bluntleaf yellowcress	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Rorippa curvipes</i> var. <i>truncata</i>	Bluntleaf yellowcress	
<i>Rorippa palustris</i>	Bog yellowcress	
<i>Rorippa palustris</i> ssp. <i>hispida</i>	Hispid yellowcress	
<i>Rorippa sinuata</i>	Spreading yellowcress	
<i>Rorippa sphaerocarpa</i>	Roundfruit yellowcress	
<i>Rosa acicularis</i>	Prickly rose	
<i>Rosa acicularis</i> ssp. <i>sayi</i>	Prickly rose	
<i>Rosa woodsii</i>	Woods' rose	
<i>Rosa woodsii</i> var. <i>ultramontana</i>	Woods' rose	
<i>Rubus deliciosus</i>	Delicious raspberry	
<i>Rubus idaeus</i>	American red raspberry	
<i>Rubus idaeus</i> ssp. <i>strigosus</i>	Grayleaf red raspberry	
<i>Rubus parviflorus</i>	Thimbleberry	
<i>Rubus parviflorus</i> var. <i>parviflorus</i>	Thimbleberry	
<i>Rudbeckia hirta</i>	Blackeyed Susan	
<i>Rudbeckia hirta</i> var. <i>pulcherrima</i>	Blackeyed Susan	
<i>Rudbeckia laciniata</i>	Cutleaf coneflower	
<i>Rudbeckia laciniata</i> var. <i>ampla</i>	Cutleaf coneflower	
<i>Rumex aquaticus</i>	Western dock	
<i>Rumex aquaticus</i> var. <i>fenestratus</i>	Western dock	
<i>Rumex densiflorus</i>	Denseflowered dock	
<i>Rumex maritimus</i>	Golden dock	
<i>Rumex salicifolius</i>	Willow dock	
<i>Rumex salicifolius</i> var. <i>mexicanus</i>	Mexican dock	
<i>Rumex venosus</i>	Veiny dock	
<i>Sagina saginoides</i>	Arctic pearlwort	
<i>Sagittaria cuneata</i>	Arumleaf arrowhead	
<i>Salix amygdaloides</i>	Peachleaf willow	
<i>Salix bebbiana</i>	Bebb willow	
<i>Salix brachycarpa</i>	Shortfruit willow	
<i>Salix brachycarpa</i> var. <i>brachycarpa</i>	Shortfruit willow	
<i>Salix drummondiana</i>	Drummond's willow	
<i>Salix exigua</i>	Narrowleaf willow	
<i>Salix geyeriana</i>	Geyer willow	
<i>Salix ligulifolia</i>	Strapleaf willow	
<i>Salix lucida</i>	Shining willow	
<i>Salix lucida</i> ssp. <i>caudata</i>	Greenleaf willow	
<i>Salix monticola</i>	Park willow	
<i>Salix nivalis</i>	Snow willow	
<i>Salix orestera</i>	Sierra willow	
<i>Salix petrophila</i>	Alpine willow	
<i>Salix planifolia</i>	Diamondleaf willow	
<i>Salix planifolia</i> ssp. <i>planifolia</i>	Diamondleaf willow	
<i>Salix scouleriana</i>	Scouler's willow	
<i>Salix wolfii</i>	Wolf's willow	
<i>Salsola tragus</i>	Prickly Russian thistle	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Salvia reflexa</i>	Lanceleaf sage	
<i>Sambucus racemosa</i>	Red elderberry	
<i>Sambucus racemosa</i> var. <i>racemosa</i>	Red elderberry	
<i>Sarcobatus vermiculatus</i>	Greasewood	
<i>Saxifraga bronchialis</i>	Yellowdot saxifrage	
<i>Saxifraga bronchialis</i> ssp. <i>austromontana</i>	Matted saxifrage	
<i>Saxifraga caespitosa</i>	Tufted alpine saxifrage	
<i>Saxifraga caespitosa</i> ssp. <i>delicatula</i>	Tufted alpine saxifrage	
<i>Saxifraga cernua</i>	Nodding saxifrage	
<i>Saxifraga chrysantha</i>	Goldbloom saxifrage	
<i>Saxifraga flagellaris</i>	Whiplash saxifrage	
<i>Saxifraga flagellaris</i> ssp. <i>crandallii</i>	Crandall's saxifrage	
<i>Saxifraga odontoloma</i>	Brook saxifrage	
<i>Saxifraga rhomboidea</i>	Diamondleaf saxifrage	
<i>Saxifraga rivularis</i>	Weak saxifrage	
<i>Schedonnardus paniculatus</i>	Tumblegrass	
<i>Schizachyrium scoparium</i>	Little bluestem	
<i>Schizachyrium scoparium</i> var. <i>scoparium</i>	Little bluestem	
<i>Schkuhria multiflora</i>	Manyflower false threadleaf	
<i>Schoenocrambe linearifolia</i>	Slimleaf plainsmustard	
<i>Schoenoplectus acutus</i>	Hardstem bulrush	
<i>Schoenoplectus acutus</i> var. <i>acutus</i>	Hardstem bulrush	
<i>Schoenoplectus maritimus</i>	Cosmopolitan bulrush	
<i>Schoenoplectus pungens</i>	Common threesquare	
<i>Schoenoplectus pungens</i> var. <i>longispicatus</i>	Common threesquare	
<i>Schoenoplectus tabernaemontani</i>	Softstem bulrush	
<i>Scirpus microcarpus</i>	Panicled bulrush	
<i>Scirpus nevadensis</i>	Nevada bulrush	
<i>Scrophularia lanceolata</i>	Lanceleaf figwort	
<i>Scutellaria galericulata</i>	Marsh skullcap	
<i>Sedum lanceolatum</i>	Spearleaf stonecrop	
<i>Sedum lanceolatum</i> ssp. <i>lanceolatum</i>	Spearleaf stonecrop	
<i>Selaginella densa</i>	Lesser spikemoss	
<i>Selaginella weatherbiana</i>	Weatherby's spikemoss	
<i>Senecio amplexens</i>	Showy alpine ragwort	
<i>Senecio amplexens</i> var. <i>amplexens</i>	Showy alpine ragwort	
<i>Senecio amplexens</i> var. <i>holmii</i>	Holm's ragwort	
<i>Senecio atratus</i>	Tall blacktip ragwort	
<i>Senecio bigelovii</i>	Nodding ragwort	
<i>Senecio bigelovii</i> var. <i>hallii</i>	Hall's ragwort	
<i>Senecio crassulus</i>	Thickleaf ragwort	
<i>Senecio eremophilus</i>	Desert ragwort	
<i>Senecio eremophilus</i> var. <i>kingii</i>	King's ragwort	
<i>Senecio fremontii</i>	Dwarf mountain ragwort	
<i>Senecio fremontii</i> var. <i>blitoides</i>	Dwarf mountain ragwort	
<i>Senecio pudicus</i>	Bashful ragwort	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Senecio soldanella</i>	Colorado ragwort	
<i>Senecio spartioides</i>	Broom-like ragwort	
<i>Senecio spartioides</i> var. <i>multicapitatus</i>	Broom-like ragwort	
<i>Senecio taraxacoides</i>	Dandelion ragwort	
<i>Senecio triangularis</i>	Arrowleaf ragwort	
<i>Senecio wootonii</i>	Wooton's ragwort	
<i>Sesuvium verrucosum</i>	Verrucose seapurslane	
<i>Setaria viridis</i>	Green bristlegrass	
<i>Setaria viridis</i> var. <i>viridis</i>	Green bristlegrass	
<i>Shepherdia canadensis</i>	Russet buffaloberry	
<i>Sibbaldia procumbens</i>	Creeping sibbaldia	
<i>Sidalcea candida</i>	White checkerbloom	
<i>Sidalcea neomexicana</i>	Salt spring checkerbloom	
<i>Sidalcea neomexicana</i> ssp. <i>neomexicana</i>	Salt spring checkerbloom	
<i>Silene acaulis</i>	Moss campion	
<i>Silene acaulis</i> var. <i>subcaulescens</i>	Moss campion	
<i>Silene drummondii</i>	Drummond's campion	
<i>Silene drummondii</i> var. <i>drummondii</i>	Drummond's campion	
<i>Silene menziesii</i>	Menzies' campion	
<i>Silene menziesii</i> ssp. <i>menziesii</i>	Menzies' campion	
<i>Silene menziesii</i> ssp. <i>menziesii</i> var. <i>menziesii</i>	Menzies' campion	
<i>Silene scouleri</i>	Simple campion	
<i>Silene scouleri</i> ssp. <i>hallii</i>	Simple campion	
<i>Sisymbrium altissimum</i>	Tall tumbled mustard	
<i>Sisyrinchium demissum</i>	Stiff blue-eyed grass	
<i>Sisyrinchium montanum</i>	Strict blue-eyed grass	
<i>Sisyrinchium montanum</i> var. <i>montanum</i>	Strict blue-eyed grass	
<i>Sisyrinchium pallidum</i>	Pale blue-eyed grass	
<i>Sium suave</i>	Hemlock waterparsnip	
<i>Smelowskia calycina</i>	Alpine smelowskia	
<i>Smelowskia calycina</i> var. <i>americana</i>	American false candytuft	
<i>Solanum triflorum</i>	Cutleaf nightshade	
<i>Solidago canadensis</i>	Canada goldenrod	
<i>Solidago missouriensis</i>	Missouri goldenrod	
<i>Solidago multiradiata</i>	Rocky Mountain goldenrod	
<i>Solidago multiradiata</i> var. <i>scopulorum</i>	Manyray goldenrod	
<i>Solidago simplex</i>	Mt. Albert goldenrod	
<i>Solidago simplex</i> ssp. <i>simplex</i>	Mt. Albert goldenrod	
<i>Solidago simplex</i> ssp. <i>simplex</i> var. <i>simplex</i>	Mt. Albert goldenrod	
<i>Solidago velutina</i>	Threenerve goldenrod	
<i>Sonchus arvensis</i>	Field sowthistle	
<i>Sonchus arvensis</i> ssp. <i>uliginosus</i>	Moist sowthistle	
<i>Sophora nuttalliana</i>	Silky sophora	
<i>Spartina gracilis</i>	Alkali cordgrass	
<i>Sphaeralcea coccinea</i>	Scarlet globemallow	
<i>Sphaeralcea coccinea</i> ssp. <i>coccinea</i>	Scarlet globemallow	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Sphaerophysa salsula</i>	Alkali swainsonpea	
<i>Sphenopholis obtusata</i>	Prairie wedgescale	
<i>Spiranthes romanzoffiana</i>	Hooded lady's tresses	
<i>Sporobolus airoides</i>	Alkali sacaton	
<i>Sporobolus contractus</i>	Spike dropseed	
<i>Sporobolus cryptandrus</i>	Sand dropseed	
<i>Stachys pilosa</i>	Hairy hedgenettle	
<i>Stachys pilosa</i> var. <i>pilosa</i>	Hairy hedgenettle	
<i>Stellaria calycantha</i>	Northern starwort	
<i>Stellaria crassifolia</i>	Fleshy starwort	
<i>Stellaria crassifolia</i> var. <i>crassifolia</i>	Fleshy starwort	
<i>Stellaria longifolia</i>	Longleaf starwort	
<i>Stellaria longifolia</i> var. <i>longifolia</i>	Longleaf starwort	
<i>Stellaria longipes</i>	Longstalk starwort	
<i>Stellaria longipes</i> ssp. <i>longipes</i>	Chickweed, starwort	
<i>Stellaria umbellata</i>	Umbrella starwort	
<i>Stephanomeria pauciflora</i>	Brownplume wirelettuce	
<i>Streptopus amplexifolius</i>	Claspleaf twistedstalk	
<i>Streptopus amplexifolius</i> var. <i>chalazatus</i>	Tubercle twistedstalk	
<i>Suaeda calceoliformis</i>	Pursh seepweed	
<i>Suaeda moquinii</i>	Mojave seablite	
<i>Swertia perennis</i>	Felwort	
<i>Symphoricarpos occidentalis</i>	Western snowberry	
<i>Symphoricarpos rotundifolius</i>	Roundleaf snowberry	
<i>Symphoricarpos rotundifolius</i> var. <i>rotundifolius</i>	Roundleaf snowberry	
<i>Symphyotrichum ascendens</i>	Western aster	
<i>Symphyotrichum boreale</i>	Northern bog aster	
<i>Symphyotrichum eatonii</i>	Eaton's aster	
<i>Symphyotrichum ericoides</i>	White heath aster	
<i>Symphyotrichum ericoides</i> var. <i>ericoides</i>	White heath aster	
<i>Symphyotrichum falcatum</i>	White prairie aster	
<i>Symphyotrichum falcatum</i> var. <i>falcatum</i>	White prairie aster	
<i>Symphyotrichum foliaceum</i>	Alpine leafybract aster	
<i>Symphyotrichum frondosum</i>	Short-rayed alkali aster	
<i>Symphyotrichum lanceolatum</i>	White panicle aster	
<i>Symphyotrichum lanceolatum</i> ssp. <i>hesperium</i>	White panicle aster	
<i>Symphyotrichum lanceolatum</i> ssp. <i>hesperium</i> var. <i>hesperium</i>	White panicle aster	
<i>Symphyotrichum spathulatum</i>	Western mountain aster	
<i>Symphyotrichum spathulatum</i> var. <i>spathulatum</i>	Western mountain aster	
<i>Taraxacum lyratum</i>	Harp dandelion	
<i>Taraxacum officinale</i>	Common dandelion	
<i>Taraxacum officinale</i> ssp. <i>ceratophorum</i>	Common dandelion	
<i>Tetradymia canescens</i>	Spineless horsebrush	
<i>Tetranneuris acaulis</i>	Stemless four-nerve daisy	
<i>Tetranneuris acaulis</i> var. <i>acaulis</i>	Stemless four-nerve daisy	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Tetranneuris acaulis</i> var. <i>caespitosa</i>	Caespitose four-nerve daisy	
<i>Tetranneuris brandegeei</i>	Brandegee's four-nerve daisy	
<i>Tetranneuris grandiflora</i>	Graylocks four-nerve daisy	
<i>Teucrium canadense</i>	Canada germander	
<i>Teucrium canadense</i> var. <i>occidentale</i>	Western germander	
<i>Thalictrum alpinum</i>	Alpine meadow-rue	
<i>Thalictrum fendleri</i>	Fendler's meadow-rue	
<i>Thalictrum fendleri</i> var. <i>fendleri</i>	Fendler's meadow-rue	
<i>Thalictrum sparsiflorum</i>	Fewflower meadow-rue	
<i>Thalictrum sparsiflorum</i> var. <i>saximontanum</i>	Fewflower meadow-rue	
<i>Thelesperma filifolium</i>	Stiff greenthread	
<i>Thelesperma filifolium</i> var. <i>intermedium</i>	Stiff greenthread	
<i>Thelesperma subnudum</i>	Navajo tea	
<i>Thelesperma subnudum</i> var. <i>subnudum</i>	Navajo tea	
<i>Thermopsis divaricarpa</i>	Spreadfruit goldenbanner	
<i>Thermopsis montana</i>	Mountain goldenbanner	
<i>Thermopsis montana</i> var. <i>montana</i>	Mountain goldenbanner	
<i>Thermopsis rhombifolia</i>	Prairie thermopsis	
<i>Thlaspi arvense</i>	Field pennycress	
<i>Tonestus pygmaeus</i>	Pygmy goldenweed	
<i>Townsendia eximia</i>	Tall Townsend daisy	
<i>Townsendia exscapa</i>	Stemless Townsend daisy	
<i>Townsendia grandiflora</i>	Largeflower Townsend daisy	
<i>Townsendia hookeri</i>	Hooker's Townsend daisy	
<i>Townsendia leptotes</i>	Common Townsend daisy	
<i>Tragopogon porrifolius</i>	Salsify	
<i>Trautvetteria caroliniensis</i>	Carolina bugbane	
<i>Trautvetteria caroliniensis</i> var. <i>occidentalis</i>	Western bugbane	
<i>Trifolium attenuatum</i>	Rocky Mountain clover	
<i>Trifolium brandegeei</i>	Brandegee's clover	
<i>Trifolium dasyphyllum</i>	Alpine clover	
<i>Trifolium dasyphyllum</i> ssp. <i>dasyphyllum</i>	Alpine clover	
<i>Trifolium hybridum</i>	Alsike clover	
<i>Trifolium longipes</i>	Longstalk clover	
<i>Trifolium longipes</i> ssp. <i>pygmaeum</i>	Pygmy clover	
<i>Trifolium nanum</i>	Dwarf clover	
<i>Trifolium parryi</i>	Parry's clover	
<i>Trifolium parryi</i> ssp. <i>salictorum</i>	Parry's clover	
<i>Trifolium repens</i>	White clover	
<i>Trifolium wormskioldii</i>	Cows clover	
<i>Triglochin maritima</i>	Seaside arrowgrass	
<i>Triglochin palustris</i>	Marsh arrowgrass	
<i>Tripterocalyx micranthus</i>	Smallflower sandverbena	
<i>Trisetum spicatum</i>	Spike trisetum	
<i>Trollius laxus</i>	American globeflower	
<i>Trollius laxus</i> ssp. <i>albiflorus</i>	American globeflower	

<i>Scientific name</i>	<i>Common name</i>	<i>Status</i>
<i>Typha latifolia</i>	Broadleaf cattail	
<i>Urtica dioica</i>	Stinging nettle	
<i>Urtica dioica</i> ssp. <i>gracilis</i>	California nettle	
<i>Utricularia ochroleuca</i>	Yellowishwhite bladderwort	
<i>Vaccinium cespitosum</i>	Dwarf bilberry	
<i>Vaccinium myrtillus</i>	Whortleberry	
<i>Vaccinium scoparium</i>	Grouse whortleberry	
<i>Valeriana acutiloba</i>	Sharpleaf valerian	
<i>Valeriana acutiloba</i> var. <i>acutiloba</i>	Sharpleaf valerian	
<i>Valeriana arizonica</i>	Arizona valerian	
<i>Valeriana edulis</i>	Tobacco root	
<i>Valeriana edulis</i> var. <i>edulis</i>	Tobacco root	
<i>Veratrum tenuipetalum</i>	Colorado false hellebore	
<i>Verbena bracteata</i>	Bigbract verbena	
<i>Verbena macdougalii</i>	MacDougal verbena	
<i>Verbesina encelioides</i>	Golden crownbeard	
<i>Verbesina encelioides</i> ssp. <i>encelioides</i>	Golden crownbeard	
<i>Verbesina encelioides</i> ssp. <i>exauriculata</i>	Golden crownbeard	
<i>Veronica americana</i>	American speedwell	
<i>Veronica peregrina</i>	Neckweed	
<i>Veronica peregrina</i> ssp. <i>xalapensis</i>	Hairy purslane speedwell	
<i>Veronica serpyllifolia</i>	Thymeleaf speedwell	
<i>Veronica serpyllifolia</i> ssp. <i>humifusa</i>	Brightblue speedwell	
<i>Veronica wormskjoldii</i>	American alpine speedwell	
<i>Veronica wormskjoldii</i> var. <i>wormskjoldii</i>	American alpine speedwell	
<i>Vicia americana</i>	American vetch	
<i>Vicia americana</i> ssp. <i>americana</i>	American vetch	
<i>Vicia sativa</i>	Garden vetch	
<i>Vicia sativa</i> ssp. <i>nigra</i>	Garden vetch	
<i>Viola adunca</i>	Hookedspur violet	
<i>Viola adunca</i> var. <i>adunca</i>	Hookedspur violet	
<i>Viola biflora</i>	Arctic yellow violet	
<i>Viola biflora</i> ssp. <i>biflora</i>	Arctic yellow violet	
<i>Viola canadensis</i>	Canadian white violet	
<i>Viola canadensis</i> var. <i>scopulorum</i>	Canadian white violet	
<i>Viola labradorica</i>	Alpine violet	
<i>Viola macloskeyi</i>	Small white violet	
<i>Viola macloskeyi</i> ssp. <i>pallens</i>	Smooth white violet	
<i>Viola nephrophylla</i>	Northern bog violet	
<i>Viola renifolia</i>	White violet	
<i>Woodsia oregana</i>	Oregon cliff fern	
<i>Woodsia oregana</i> ssp. <i>cathcartiana</i>	Oregon cliff fern	
<i>Woodsia scopulina</i>	Rocky Mountain woodsia	
<i>Yucca glauca</i>	Soapweed yucca	
<i>Zigadenus elegans</i>	Mountain deathcamas	
<i>Zigadenus elegans</i> ssp. <i>elegans</i>	Mountain deathcamas	



# Appendix D

## *Public Comments*

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Please note that, because this final document is based upon the draft EA and LPP for the SLVCA, the comments enclosed herein were on the broader SLVCA and were responded to accordingly. Some of these comments and responses are less relevant to the smaller SCCA discussed in this final land protection plan.

**Letter #1— Biosphere Coalition (page 1 of 14)**

**Service Response to Letter #1**

Thank you for your support of the conservation vision described in the Draft SLVCA EA and LPP. Responses to comments on specific points follows.



**Biosphere Coalition**

**COMMENTS, Re: USFWS EA-LPP**

Date: 2012, June 8

To: Dr. Michael Dixon, Land-use Planning Team Leader  
 US Fish & Wildlife Service  
 PO Box 25486 DFC  
 Denver, CO 80225

From: Michael Monterey, PC, Director of Program Development, Planning & Project Coordination, Biosphere Coalition; and T. Glyder Tucker, MA, PC, Biosphere Coalition & Baca Grande POA Natural Surroundings Committee  
 Re: USFWS Draft Environmental Assessment & "CE" Land Protection Plan for the proposed San Luis Valley Conservation Area

**INTRODUCTION**

The Biosphere Coalition planning policy team analyzed the key issues, principles, stratagems and methods embodied in the current draft Environmental Assessment. In response to the USFWS Planning Team presentation by Dr. Michael Dixon (June 16, 2012, at Moffat, CO), we support LPP "Alternative B" and submit our comments to support effective recovery of regional aquifers, for optimal protection of Areas of Critical Ecological Concern (ACEC), enabling best practice for restoration, conservation, and protection of the Great Sand Dunes National Park & Preserve (GSDNPP), its Hydrogeologic Region, its integral bioregion, and optimum support for sustainable economic development in the San Luis Valley (SLV) and greater Southern Rocky Mountain Ecoregion (SRME).

As referenced repeatedly in the current draft Environmental Assessment (EA) and draft Land Protection Plan (LPP, dated May 2012), the ACEC, sensitive and threatened habitats within the proposed San Luis Valley Conservation Area (SLVCA), include Globally Rare, Outstanding & Very High Biodiversity areas, montane, and submontane riparian habitats threatened by current planning, management policy, and unsustainable agriculture in the proposed SLVCA. Therefore, our comments and recommendations focus on supporting the best aspects of the current draft LPP, and actual protection of the most imperiled species, habitats, and stakeholders in the SLV and the greater SRME.

First, we are glad that Public Trust species and eight "Focal Species" have been identified by the USFWS Planning Team as essential to adaptive ecological response, planning, and management. Our main concerns are for CE implementation in the Crestone-Baca Grande Subdivision (Crestone-BGS) area, since seven of the eight Focal Species are documented (by Biosphere Coalition and other observers) as residing here. These Focal Species and habitat concerns require expedited collaboration for realizing the goals of the SLVCA and CE program.

**Biosphere Coalition** :: PO Box 351, Crestone, CO 81131 719.480.2262 / 256.4086

## Letter #1—Biosphere Coalition (page 2 of 14)

### Service Response to Letter #1

COMMENTS, Re: USFWS EA & LPP, page 2

We now realize that some of the most difficult problems and issues impacting local officials, land managers, planners, ranchers, and farmers are due to failure to address the importance of certain sensitive ecological areas and their role in sustaining functional riparian habitat [in a timely manner], wildlife corridors, recharge zones, and wetlands hydrology in the BSNWR and GSDNPP. Therefore, we address the problem and recommend a resolution supporting optimal fulfillment of the intent and mission critical objectives of the USFWS and the SLVRC LPP. Our specific comments are followed by conclusions and general recommendations.

#### SECTION A

It is well understood that there are endangered, threatened, and "candidate" species and habitat.

"Surface and ground water diversions have significantly changed the amounts and timing of flows in most valley streams. In addition, ground water use has exceeded recharge rates in large portions of the valley.

"...The potential for farmers and ranchers to sell water rights from their lands or even convert current land use practices from agricultural to residential, industrial, or municipal uses will continue to grow and threaten the biological integrity of the San Luis Valley." – USFWS EA, chap. 1, p. 1, May 2012 (published date of document, typical)

In the last 40 years, these problems have severely injured and eradicated over an estimated twenty thousand acres of wetlands and historic riparian areas, threatening or locally eliminating endangered species, among others. To ensure optimal realization of the beneficial objectives of the draft EA-LPP (and a truly effective CCP), a truly "win-win" best case outcome can and must include restoration and actual conservation — with on-the-ground work and durable legal protection — for historic riparian habitat and wetlands adjacent to the BSNWR, GSDNPP, and other refuge areas sustained by essential habitat in peril.

Biosphere Coalition's primary concerns, related to the CE LPP program proposed for the SLVCA, is watershed and habitat protection in the GSDNPP Hydrogeologic Region, which includes the town of Crestone and Baca Grande POA greenbelt riparian/wetland areas, very appropriate to the stated SLVCA project goals:

1: "conserve, restore, enhance, and protect wetland and riparian habitat, an important breeding and foraging resource in the high mountain desert for migratory shorebirds, waterfowl, and neotropical passerine birds"

We strongly agree with goal 1 and 2, especially for the Crestone-BGS area.

2: "support the recovery and protection of threatened and endangered species that occur in the SLVCA, and reduce the likelihood of future listings under the Endangered Species Act by prioritizing key habitat for listed species and species that are candidates for listing"

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#### A1–A3, A5, A6

We agree that the wetland and riparian areas in the Crestone and Baca Grande area have important wildlife value. While they were not specifically identified in the prioritization map on page 64 of the draft LPP, we would certainly consider working with willing sellers to provide easements on those parcels to ensure their permanent protection.

## Letter #1—Biosphere Coalition (page 3 of 14)

## Service Response to Letter #1

COMMENTS, Re: USFWS EA & LPP, page 3

- 3: "protect the integrity of these habitats by preventing fragmentation and off-parcel sale of surface water"
- We strongly emphasize the importance of goal 3 for the Crestone-BGS.
- 4: "conserve working landscapes based on ranching and farming activities that support a viable agricultural industry"
- We recognize the importance of agriculture to the SLV economy and its rural agrarian esthetic, but insist on qualifying the terms to foster viable agriculture based on "Optimal Use" (supporting both economic and ecological sustainability); yet current practices counteract the goals of the current draft LPP (documentary evidence is available), causing serious ongoing injuries to the critical habitats and Focal Species the SLVCA is designed to protect and restore.
- 5: "promote ecological resiliency and adaptive capacity by connecting together the existing network of public and private conservation lands"
- Goal 5 is an exact example of what would occur with specific inclusion of the Crestone-BGS area as a demonstration of the benefits of the LPP and SLVCA.
- 6: "protect, restore, or, when necessary, emulate the *historic* hydrologic regime of the valley to ensure the presence of 'wildlife habitat'"
- Goal 6 is important, because we recognize that the historic hydrologic regime of the Crestone-BGS area must be emulated or restored to sustain proper functioning and the goals of the LPP. This also applies to the rest of the watersheds within the greater GSDNPP Hydrogeologic Region.
- We are concerned by the language and implications in the paragraph that follows the SLVCA and LPP goals, quoted below:

"The Service will phase in implementation of the overall project. We anticipate focusing first on the southern Sangre de Cristo mountains, with conservation on the valley floor to follow. During this comment period we want to hear from all interested parties and partners to ensure we understand and consider any concerns or comments about the acquisition of easements in these areas. A Habitat Conservation Plan for the southwestern willow flycatcher is currently in development by local governments and pertains to the valley floor. *This and considerations about the actual easement language as it relates to water use and rights may take longer to resolve.* These issues are less likely to be concerns in the southern Sangre de Cristo mountains. *Therefore, we anticipate that, if the overall plan is approved, we will focus our initial implementation efforts there.*"

Starting the SLVCA program in the Southern Sangre de Cristos area will be to the detriment of the seven Focal Species in our area of the SLV. There is no reason to think that the local-regional Habitat Conservation Plan ("HCP") should be given greater priority or status than an optimal LPP for the SLVCA as a whole. Our area includes some of the SLV's rarest habitats of Outstanding & Very High Biodiversity.

Biosphere Coalition comments on and emphasizes the following, derived from (EA, p. 3) previous LPP scoping process, as follows:

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### A1–A3, A5, A6

We agree that the wetland and riparian areas in the Crestone and Baca Grande area have important wildlife value. While they were not specifically identified in the prioritization map on page 64 of the draft LPP, we would certainly consider working with willing sellers to provide easements on those parcels to ensure their permanent protection.

### A4

Certainly not all agricultural activities are compatible with the persistence of wildlife habitat that would be considered for protection under the SLVCA. Service biologists have identified overgrazing of riparian areas as having serious negative impacts on the capacity of that vegetation to regenerate in much of Colorado. However, an easement will prevent other types of potentially harmful habitat alteration, and landowners participating in the SLVCA would be encouraged to discuss opportunities for habitat management or restoration such as funding through the Partners for Fish and Wildlife Program.

## Letter #1—Biosphere Coalition (page 4 of 14)

### Service Response to Letter #1

COMMENTS, Re: USFWS EA & LPP, page 4

**A: “How will the SLVCA affect water use in the valley?”**

The best implementation of an optimal SLVCA LPP will vastly improve the quality of water-use, conservation, and recovery of SLV ground waters and aquifer levels.

**B: “Develop partnerships for land protection.”**

This essential challenge to fostering and supporting all the best elements and objectives embodied in the SLVCA and LPP; and Biosphere Coalition supports a proactive public education and interagency forums with timely presentations from any and all stakeholders. The EA mentions the major neighboring stakeholder adjacent to the BINWR, the GSNPP, which receives little focus in the EA and LPP, though the huge combined acreage of the two “units” are “co-managed.”

**C: “Ensure that the SLVCA planning process incorporates the importance of protecting cultural resources.”**

There is no better way to protect and enhance cultural resources than to provide optimal restoration, protection, and conservation of natural beauty, resources, and critical habitats that sustain the SLV’s resident species and its economy.

**D: “How will the SLVCA increase the capacity to adapt to climate change on the existing refuges and habitat throughout the valley?”**

The best scientific research shows conclusively that restoration of ecologically critical habitat, wise water-use, and optimal protection of the land and focal species will support optimal hydrologic recharge of groundwater, aquifers, and moderation of the effects of climate change and cyclic drought impacts. Hence, optimal implementation of the proposed SLVCA will greatly increase adaptability, resilience, and sustainability of all habitats and species, including ours.

**E: “The plan should account for air, soil, sound, and visibility effects.”**

We deeply appreciate the inclusion of this complex set of inseparably interdependent, interactive elements of the optimal solution. The quality of air, soil, sound, and visibility in the SLV are essentially important to our regional quality of life and our economy.

The following section includes language addressing some of the lands and protected habitat areas subject to various public and private conservation programs. In the first subsection text on the San Luis Valley National Wildlife Refuge (SLVNWRF) Complex, we see mention of “an emphasis on wetlands and riparian systems” and that “management practices include vegetation manipulation and the artificial movement of water.” The text also says that “limited water availability presents significant challenges” aggravated by climate change and ramifications of Colorado water law.

Present refuge resource management gives cause for serious concern. Yet, it is encouraging that the “secondary goal of the SLVCA is to help restore the hydrology of the San Luis Valley both on and off existing refuges to help ameliorate some of the problem.”

One of the most challenging but important issues being investigated during the ongoing development of a comprehensive conservation plan (CCP) for the San Luis Valley National Wildlife Refuge Complex regards future changes in water use on the refuges. We encourage you to stay involved in the planning for the CCP as it goes forward.

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## Letter #1—Biosphere Coalition (page 5 of 14)

### Service Response to Letter #1

COMMENTS, Re: USFWS EA & LPP, page 5

The Crestone-BGS area is adjacent to the BSNWR, BLM ACEC, and GSDNPP. It offers a unique opportunity, an inter-agency, public-private demonstration of the potential of the proposed SLVCA, its CE program, and the optimal LPP.

The unique private lands and Greenbelts of Crestone and the Baca Grande Property Owners Association (BGPOA) are ecologically essential corridors connecting the Rio Grande National Forest, Baca National Wildlife Refuge (BNWR), and Great Sand Dunes National Park (GSDNP), all within its Hydrogeologic Region. The streams and groundwaters of the Crestone-Baca area recharge the BSNWR, BLM, and GSDNPP groundwater, running from and through the Sangre de Cristo mountains into the Eastern SLVCA aquifer recharge zones. The "greenbelts" and historic riparian wildlife corridors within the town of Crestone and Baca Grande Subdivision, serve as a unique nexus of the area's biological connectivity and ground water resources (including North Crestone Creek, South Crestone Creek, Willow Creek, Spanish Creek, Cottonwood Creek, and other privately owned riparian zones in the SLVCA) at the San Luis basin's hydrologic recharge zones provide an example and an ideal model for best case planning, restoration, and protection.

The mention of important habitat for declining Rio Grande cutthroat trout and other imperiled species, re: the USFS is encouraging. The native trout and other aquatic and avian species of the Crestone-Baca area have declined severely. As mentioned in the draft EA subsection on BLM lands, the local streams, riparian corridors, and intermittent wetlands of the Baca Grande are important for many migratory species, including the focal species of concern featured in the SLVCA EA & LPP.

Biosphere Coalition is especially committed to supporting the stated mission (EA, p. 5) of the USFWS NWR System:

"...administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans." (National Wildlife Refuge System Improvement Act of 1997)

#### SECTION B

"As described in detail in this chapter, the habitats of the valley and surrounding mountains are crucial to the breeding and migration of migratory birds, band provide important opportunities for persistence or reintroduction of populations of imperiled species that are protected under the Endangered Species Act." — USFWS, EA, chap. 3, p. 10

Ecologically viable and legally durable Conservation Easements placed on the wildlife corridors and riparian habitat within BGPOA land [and other lands between the surrounding Public Lands] could secure area-wide connectivity.

"The San Luis Valley's hydrology is strongly influenced by the surface runoff and ground water flows from the surrounding mountains. This hydrology has created a

#### Section A

Discussion of phased implementation: The Service is committed to collaborating with the local governments in their efforts to obtain land for mitigation under the HCP and in their work to resolve the long-term challenges about water in the San Luis Valley. It is important to recognize that we view the LPP as a long-term vision, and an initial focus on the southeastern part of the project area will not negate that long-term vision.

#### Section B

Agreed. We look forward to working with property owners in the Baca Grande area as we start rolling out conservation delivery in other parts of the SLVCA.

## Letter #1—Biosphere Coalition (page 6 of 14)

### Service Response to Letter #1

#### COMMENTS, Re: USFWS EA & LPP, page 6

network of riparian corridors and wetlands that break up large expanses of associated desert and upland habitats across a 7,000-foot elevation gradient, resulting in high plant diversity...

"The combination of plant structure and density coupled with water depth and duration creates rich habitat diversity within each larger area of wet meadow. This richness of habitat creates tremendous foraging and nesting opportunities for a variety of bird species. Among these are numerous species of waterfowl as well as sora, Virginia rail, white-faced ibis, American avocet, Wilson's snipe, and Wilson's phalarope." – EA, p. 12-13

Many species listed in the quote above are or were present in or throughout the Crestone-BGS area (re: personal report on Spanish Wetlands). Restoration of natural instream flow and riparian hydrologic regimes will protect such species and their habitats and fulfill LPP goals. Current management practices are actually accelerating the excessive depletion and injury of SLV streams, groundwater, and aquifers that have historically sustained the lands now owned by the FWS SLV/NWR Complex, the BLM, GSDNPP, and other public and private lands in the valley floor.

According to the CO Water Court decree for Case 04CW35 (relying on scientific findings drawn from federally funded surveys for establishing the GSDNPP), pumping San Luis Closed Basin water not only lowers the water table in its immediate vicinity, but more rapidly drains the valley margin recharge zones, from below. The pumping artificially increases the virtual steepness of the flow gradient. Projections about local climate impacts and typical generalizations that ignore the hydrology of the unique groundwater and aquifer recharge area adjacent to the BNNWR (i.e., the Crestone-BGS area to the East) are inappropriate for effective planning and land protection.

"Riparian habitat includes trees, shrubs, and other streamside vegetation and is associated with intermittent and perennial waterways. This community may flood every year. Its historic extent on the valley floor has been reduced due to surface water diversion. Woody riparian habitat is sensitive to excessive grazing, which limits regeneration of the dominant willows and narrow-leaf cottonwood trees. Shrubs that contribute to the structural diversity of riparian habitat include red-osier dogwood and greasewood.

"These shrublands and forests provide important stopover habitat for migratory passerines, as well as nesting habitat for species such as Lewis' woodpecker, willow flycatcher, and possibly yellow-billed cuckoo. In addition, the shade and stream bank stabilization provided by riparian vegetation is important in maintaining temperature and water quality in streams and rivers for species such as the endemic Rio Grande cutthroat trout, Rio Grande chub, and Rio Grande sucker." – EA, p. 14

We strongly recommend expediting CE R&D that includes perpetual retention and/or long-term leasing of water rights for success of the SLVCA. Many species of plants and birds that depend on the rich diversity and connectivity of the riparian corridors in the hydrogeologically unique Crestone-BGS area are among the most endangered or of

It is likely that the Closed Basin Project has broader impacts on the San Luis Closed Basin system than just the aquifer levels in its immediate vicinity. However, this is not an issue over which the Service has authority, nor can it be addressed through a conservation easement program. The SLVCA is only one piece of what will need to be a cooperative, multifaceted approach to resolve long-term water issues in the valley.

## Letter #1—Biosphere Coalition (page 7 of 14)

### Service Response to Letter #1

COMMENTS, Re: USFWS EA & LPP, page 7

special concern. Some of the SLV's rare and endangered reptiles and amphibians have already declined to near local extinction.

Two more years may be too long to wait to save and restore some of the SLVCA's Public Trust Waters that sustain Public Trust Species, ACEC, historic riparian areas, Globally Rare, Outstanding, and Very High Biodiversity habitats. So, we appreciate the great emphasis placed on the importance of the southwestern willow flycatcher which, like other indicator species, has all but disappeared from some riparian corridors of the SLV margins. We appreciate the extensive listing and consideration of critically imperiled aquatic species as well. Eagles used to catch native fish and nest in the Baca Grande area, but not now. The sage thrasher is another native of the area above the BNWR. In fact, most of the mammals listed throughout the EA & LPP use the Crestone-BGS greenbelts as habitat and/or riparian corridors to move between the montane zone and the valley floor. Some, like the native beaver, are keystone species, essential to quality and quantity of SLV water, wetlands, and other species. Biosphere Coalition recommends relatively rapid response to the crisis in progress.

We recognize the serious educational and budgetary challenges facing anyone devoted to real solutions. Yet, appropriate R&D, realistic planning, and well coordinated, tightly coupled, public-private collaboration will expedite optimal results, ecologically, economically, and legally.

"Tourism is a cornerstone of the local economy, and the tourism industry in the San Luis Valley shows strong development potential. With a diverse collection of natural and heritage assets, the local tourism industry is able to cater to a variety of recreationalists, including outdoor recreationalists; visitors to the Great Sand Dunes NPP; resort tourists; vacation and second home owners; eco-tourists; heritage, arts, and cultural tourists; and visitors who pass through the area on their way to other regional attractions (Center for Rural Entrepreneurship 2008). According to the 2006 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, approximately 3.1 million residents participated in wildlife-associated recreation activities in Colorado and New Mexico in 2006 (USFWS 2008). It was estimated that residents and visitors combined spent \$3.8 billion on wildlife-associated recreational activities in 2006 in the two States combined, with Colorado accounting for approximately 79 percent of this spending." – EA, p. 29

Those facts bode well for the hospitality, services, and food service sectors, and for stronger focus on nonfarm, nonextractive, "green" development in the SLV. Approximately 70% of the strength of our formerly affluent national economy was supported by consumer spending, driven by real wage growth, the importance of the SLVCA's nonfarm sectors transcends the dollar amounts of revenue. Over 75% of Alamosa County's economic occupations are in the business, management, finance, service, sales & office, professional (and related) segments of the nonfarm sectors. That translates to jobs and votes and nonfarm related activities. Although the number of farms and productive agricultural acres may be among the highest in the SLV,

We appreciate your recognition of the conservation challenges in the San Luis Valley, and the factors that require a careful, pragmatic approach to delivering conservation there

## Letter #1—Biosphere Coalition (page 8 of 14)

COMMENTS, Re: USFWS EA & LPP, page 8

approximately 3.7% of Alamosa County's population in farming, mining, and forestry segments. Hence, the confluence of declining agricultural product values, increasing likelihood of drought, radical climate change impacts, and lack of effectively adaptive transition to a greener economy, countered by responsive land protection and greener water-use policy in the SLV could provide a pathway to sustainable success.

Therefore, Biosphere Coalition urges the most progressive possible leadership and seeks to assist the USFWS in fulfilling its purpose and mandated objectives, especially in light of the following facts and issues:

"...The SLVCA is the southernmost significant waterbird production area in the central flyway and is the most important waterfowl production area in Colorado. According to Partners in Flight, riparian habitats in the region support the highest bird diversity of any western habitat type (USFWS 2010a).

"The highest-remaining concentration of wetlands in Colorado occurs in the San Luis Valley and protection of every remaining wetland acre is a high priority (USFWS 2010a). Manipulation of the natural hydrological cycle in the San Luis Valley for agricultural purposes has resulted in the loss of significant wetland habitat (USFWS 2010a). Most of the remaining wetlands in the SLVCA occur on private ranch and farm land and are reliant on the water diverted out of rivers and creeks or from artesian wells to maintain their value to wetland-dependent wildlife (USFWS 2010a).

"Maintaining the current connectedness of the wetland complex through permanent protection would limit the risk for species movement patterns to be disrupted due to fragmentation and would also maintain important migration corridors and linkages between seasonal ranges necessary to meet the life-history requirements for many wildlife species (USFWS 2010a)." – EA, p. 30-31

We recognize the validity and critical importance of the data and related realizations stated in the quoted text above. The final sentence quoted (underlined) is of greatest importance in understanding the urgency and necessity of an optimal LPP for the SLVCA. Again, we must emphasize that the points and issues of greatest concern are especially critical in the Crestone-BCS area, possessing the most uniquely rich biodiversity and critically important connectivity in the montane and submontane areas between Medano Creek and the Orient Land Trust along the recharge margin of the SLV at the foot of the Northern Sangre de Cristos.

We appreciate the USFWS initiative for creating new CEs for the proposed SLVCA Land Protection Plan, potentially protecting historic riparian areas and habitat identified in a Colorado Natural Heritage Program's (CNHP) biological survey for Crestone-Baca Land Trust, 2005). Such areas include Saguache County Open Space (purchased with GOCO funds) and Crestone-Baca Land Trust lands (shown on the USFWS Focal Species habitat maps), neither of which are protected by durable CEs. Providing adequate protection in perpetuity, with sufficient consideration of water-rights issues, realistic resource management practices, and policies will serve the best interests of all SLVCA species and stakeholders. We urge best practices to ensure best results, re:

Biosphere Coalition :: PO Box 351, Crestone, CO 81131 719.480.2262 / 256.4086

## Letter #1—Biosphere Coalition (page 9 of 14)

### Service Response to Letter #1

COMMENTS, Re: USFWS EA & LPP, page 9

"Water quantity, quality, and use issues are major threats to the sustainability of wetland and riparian habitats in the SLVCA. Changes in water quality and quantity have adverse effects on the function of the wetland complex located in the valley floor. There are, for example, growing concerns about the impacts of new contaminants, such as endocrine-disrupting chemicals, that can affect water quality on both private and public lands (USFWS 2010a)."

Current litigation (late May, 2012) involves the Rio Grande Water Conservation District-Subdistrict 1, re: numerous technical objections to their Annual Replacement Plan. Biosphere Coalition emphasizes restoration of historic zones of aquifer recharge as the focus of the LPP. Thus, we recommend best practices for aquifer depletion protection in the interim, and for maintenance of riparian habitat in the critical Crestone-BGS area. In concert with the LPP objectives, we recommend restoration of five historic flows, requiring up to 2500 A/ft/yr. For reference on the issues, we quote your EA, below:

"These circumstances threaten healthy riparian systems along the Rio Grande, Congjos, and Alamosa rivers, where senior water rights are currently used in the floodplain. The evolving economic and regulatory environment in the SLVCA will likely result in the acquisition of some of these water rights to augment distant wells, moving water out of the floodplain and degrading migratory bird habitat (USFWS 2010a). Additionally, this will increase the State's difficulty in managing water in the Rio Grande and administering the Rio Grande Compact. For these reasons, the Rio Grande Water Conservation District and other water users in the San Luis Valley will support the SLVCA in acquiring conservation easements along these rivers (USFWS 2010a)." —EA, p. 32

So, to foster best case implementation, in addition to the proposed CE program, we urge expedited Partnering with Biosphere Coalition in conservation grant funding programs for habitat restoration, maintenance, and monitoring. We agree that effective implementation of the LPP cannot be realized without new monitoring locations and methods for groundwater levels and quality, riparian soil hydration and temperature testing, on-the-ground biological survey updates, species reintroduction, and critical habitat support work, especially for Focal Species and native bats. To ensure economical implementation, we will support Green Jobs programs and use of interns and volunteers.

Biosphere Coalition presents the above information for consideration in the final EA-LPP to support optimal realization of the SLVCA objectives. We also strongly recommend Partnering with USFWS Division of Wildlife Management & Habitat Restoration to access optimal grant funding for the SLVCA. Refer to Appendix B for ideal agency guidelines on this opportunity. We would appreciate the agency guidelines being included in the final EA-LPP.

We strongly agree with and encourage the most effective use of "exceptions" to protect lands with "high habitat value" over subsurface mineral rights unlikely to be developed. Acquiring sustainably perpetual CEs for the Northeastern SLV is especially important to realizing our best mutual interests, initiatives, and the results we wish to

Through the SLVCA, the Service hopes to achieve protection for certain types of wildlife habitat, much of it dependent on water. However, larger issues of regional water use, policy, and monitoring programs are outside of the scope of this plan and outside of the authority granted to the Service.

## Letter #1—Biosphere Coalition (page 10 of 14)

### Service Response to Letter #1

COMMENTS, Re: USFWS EA & LPP, page 10

see for all generations. Additionally, collaborating with the GSDNPP supports the ecological integrity of their Management Plan, ensuring biological connectivity with adjacent lands and ecosystems within the greater GSDNP Bioregion. Making best use of water law is clearly essential to optimal realization of the SLVCA and CE conservation efforts. Hence, with certain reservations, we appreciate inclusion of the following in the draft EA:

"In Colorado, every water right must be adjudicated through the Water Court. There are now legal avenues to use water for beneficial use without a diversion, such as instream flows.

"If there is not enough water to satisfy all water right holders in a particular stream, the State may shut off junior rights as necessary to ensure that senior water right holders receive their full appropriation. The Rio Grande basin in Colorado is considered over-appropriated.

**Note: We recommend another approach to best fulfill LPP goals. We suggest basing appropriation on time instead of volume, per Huerfano River aqueduct allocation system, such as in the Redwing (CO) area, among others. If this is implemented as a "beneficial use without a diversion," then every water stakeholder in this Northeastern SLV would receive water and desired legal avenues are opened for restorative nonconsumptive use, i.e., in historic riparian flow regimes (pre-dating roads, ditches, diversions, etc.), also including more recent riparian zones.**

"Ground water in Colorado is designated as either tributary or non-tributary. Tributary ground water is water contained in aquifers that have a direct hydraulic connection to surface water. The unconfined aquifer in the San Luis Valley is tributary ground water. Tributary ground water is treated administratively the same as a surface water diversion. The confined aquifer in the San Luis Valley is also considered tributary, though the hydraulic connection to the surface water system is poorly understood." – EA, p. 33, re: Water Law, Colorado

The "poorly understood" connection of the aquifers has been studied and used in Water Court findings and decrees, re: Cases # 04CW35 and 86CW46, among other cases. More importantly, the submontane recharge process must be recognized as necessary to the success of the LPP and for long-term aquifer recovery and stabilization.

Though the Biosphere Coalition favors a more extensive application of the legal term "Optimal Use" (as a superior prescription for sustainable water-use policy and practice), we approve the intent to take advantage of "legal avenues to use water for beneficial use without a diversion."

Biosphere Coalition (and others) will play an increasingly active role in supporting effective multi-agency cooperation. We already support the CE efforts of the expanded BLM ACEC restoration project (EA in progress), while continuing to play an active role in on-the-ground reintroduction of native habitat (for southwestern willow flycatcher and other Focal Species, while also including ducks, shorebirds, muskrat, beaver, buffalo, amphibians, phreatophytes, slender spider flower, native willows, etc.).

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The San Luis Valley refuges are water users, subject to Colorado water law. While there are likely alternatives in how water rights are adjudicated and how water is appropriated, this is outside of the scope of this LPP and outside of the authority of the Service.

## Letter #1—Biosphere Coalition (page 11 of 14)

### Service Response to Letter #1

#### COMMENTS, Re: USFWS EA & LPP, page 11

Biosphere Coalition is committed to fostering the Colorado Water Conservation Board's "Instream Flow" conservation initiatives, all essential protections, and nonconsumptive use projects supporting optimal management of natural resources, ACEC's, and LPP CE areas.

With the Closed Basin Project in operation, a long-term Land Protection Plan for the SLVCA Bioregion is unworkable, because any CEs and similar protections within the Saguache County area would be jeopardized. Adopting and implementing the mandated program initiatives of the BLM's "Riparian-Wetland Initiative" of the 1990s will expedite success throughout the USFWS jurisdiction. (see the four major goals of that program in Appendix C).

Biosphere Coalition also supports optimal re-use, "green" upgrading, and development of the historic ranch and farm buildings remaining on BNR land. In reference to our previous comments (May 7), the upgraded facilities can serve as a model of rural ecotourism development, featuring habitat restoration, species re-introduction, ecological education, training, and research center facilities. We propose and support multi-agency and private funding and recommend inclusion of this option in an Appendix to the final draft EA.

#### CONCLUDING SUMMARY

Albert Einstein noticed that problems are not solved with the kind of thinking that caused them in the first place.

We strongly agree that "conservation of additional wildlife habitat in the SLVCA would be consistent with the policies, management, and plans listed on page 5 of the EA. We also look forward to helping with strategic alliance building, advisory, and consulting services for adequate funding acquisition, program R&D, on-the-ground project supervision, monitoring, and performance assessment.

Clearly, the time is ripe for realistic sustainability policy, planning for best case conservation, real commitment to compliance and enforcement, and actually fostering sustainable economics throughout the SLVCA.

The USFWS conservation program initiative calls for protecting 530,000 acres of the SLVCA over a period of 100 years. At the rate (and cost) of current CE acquisition, 100 years may not be enough for sustainability. So, we specifically propose more effective funding and CE strategy. We also urge inclusion of approximately 3,600 acres of local riparian areas (in Crestone, the Baca Grande subdivision, and neighboring areas) as essential to sustain connectivity and continuity of GSDNP Bioregion ecosystems (including the BNR). These areas and their recharge zones in the montane and submontane areas, encompassing the BGPOA Subdivision, depend on their historic streams and groundwater flows, which also sustain recharge of both confined and unconfined aquifers.

Sustaining the essential ecosystem services and riparian-wetland functions of the Crestone-BGS area requires managing from 2200 to 2500 Aftfy of water for aquifer

Biosphere Coalition :: PO Box 351, Crestone, CO 81131 719.480.2262 / 256.4086

We encourage you to stay actively involved with the CCP process for the three San Luis Valley refuges, which may explore the choices for infrastructure development and public use of the Baca National Wildlife Refuge.

## Letter #1—Biosphere Coalition (page 12 of 14)

COMMENTS, Re: USFWS EA & LPP, page 12

recovery, restoration, and/or preservation of historic flow regimes. Riparian zones also provide 90% of the Natural Capital sustaining human life (see Lovins, Hawkins, et al).

Accomplishing real sustainability and mandated aquifer recovery and satisfying treaty obligations urgently requires phasing out the Closed Basin Project (CBP) to conserve all allocated CBP water by mid-2014. Realistic updating of the Rio Grande Compact (RGC) for reversion to supply of obligations with the prior sources and annual indexing for climate change is also essential.

Finally, in Saguache County, "Open Space" designation for some of the areas of our concern exists, but the legal protections are not durable. CEs providing perpetual protection are essential for optimal implementation of the USFWS CE Land Protection Plan proposed for the SLVCA.

Local ecosystems and the and global biosphere are indivisible. The SLVCA is an inseparable interdependent part of the Rio Grande Watershed and the greater Rocky Mountain environment. What happens in the "margins" of the SLVCA is crucial to what happens elsewhere. We intend to vigorously support the best case outcome.

Sincere thanks for your time, attention, commitment to excellence, and good stewardship. Feel free to call with questions, etc.

For Biosphere Coalition...

T. Glyder Tucker & Michael Monterey  
 Michaelm.biospherecc@gmail.com

### APPENDIX A

"...the San Luis Valley is one of the most impoverished regions of Colorado with Costilla, Saguache, and Alamosa Counties representing the first, second, and third highest poverty levels statewide. Within the nine-county region, Hinsdale County, Colorado, had the highest median household income (\$74,659 per year) and the lowest poverty rate (3.7 percent). Costilla County, Colorado, had the lowest median household income (\$24,388 per year) and the highest poverty rate (28.4 percent). With the exceptions of Hinsdale and Mineral Counties....all of the counties in [the Colorado SLV] region had poverty levels above the statewide average, with Costilla and Alamosa Counties having poverty rates nearly twice Colorado's average." (U.S. Census Bureau 2010b) – EA, p. 28

Based on our comparative study of the economics of the Colorado portion of the SLVCA, an approximate assessment of the total data integrated with compiled EA data supports an unpromising scenario for the resident populations without more effective planning and rapid transition to sustainable development. While per county population growth projections may be off by wide margins, if current policies and trends continue the growing disparity of poverty and affluence will grow, roughly in proportion with the disparity in levels of education. Hence, we can safely draw useful inferences from the

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## Letter #1—Biosphere Coalition (page 13 of 14)

COMMENTS, Re: USFWS EA & LPP, page 13

economics profile of Alamosa, bearing in mind the similar statistics on per capita poverty and farm related occupational components.

Alamosa County's percentage distributions of occupations is very close to the national averages, with the exception of the farming-mining-forestry segment, which is over three times the national population in the same segment. Using US Census data from 2007 to 2010, we find that Alamosa County may have approximately 700 farms/ranches (largely family owned) with an approximate average of \$300,000 in per farm gross sales, but approximately \$200,000 in costs per farm.

That means that Alamosa County's farming-mining-forestry industries realize a gross margin of about 33% and gross profit (before tax) of nearly \$70 million, from gross receipts of about \$210 million. We recognize the declining market value of agricultural products, but the large increase in real inflation probably gives roughly similar dollar numbers today. That contrasts with the county's estimated numbers for retail, wholesale, hospitality & food service sectors, with combined revenues of nearly \$378 million.

Hence, the LPP objectives must give adequate weight to nonAg economic potentials. Farming, mining, and forestry are highly mechanized, thus proportional to the high poverty and unemployment rates in the SLVCA area. Smaller, more sustainable family farm operations would be much more advantageous to overall LPP objectives.

### APPENDIX B

#### USFWS Funding Program Initiatives:

Initiative A: Support for locally-based field biologists' one-on-one work with private landowners and other "partners" to plan, implement, and monitor their projects.

Initiative B: Use the USFWS "Partners Program" field staff to help landowners find other sources of funding and help them through permitting and transition [to Optimal Use] for long-term ecological and economic sustainability.

Initiative C: Restore injured & eradicated habitat. Instream Flow resources & wetlands with appropriate Nonconsumptive Use regimes and fencing to protect riparian habitat & species & neighboring properties (to "improve habitat for Federal Trust Species, including migratory birds; threatened and endangered species; inter-jurisdictional fish;" and, other declining species)

Initiative D: "Complement activities on National Wildlife Refuge System lands, or contribute to the resolution of problems on refuges that are caused by off-refuge practices"... foster and support effective planning, restoration, conservation, sustainable water resource management, providing seminars, webinars, and workshops on climate change impacts, alternatives and options for ground water recovery, and project quality assurance

Initiative E: "Address species and habitat priorities... identified [by "USFWS"] planning teams with our partners or in collaboration with state fish and wildlife

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## Letter #1—Biosphere Coalition (page 14 of 14)

COMMENTS, Re: USFWS EA & LPP, page 14

agencies." (re: Southwestern Willow Flycatcher, ducks, native Rio Grande Cutthroat trout, frogs, muskrat, beaver, buffalo, native phreatophytes, etc.)

Initiative F: "Reduce habitat fragmentation [or create buffers] for other important Federal or state conservation lands." (re: adjacent to the BNNWR and GSDNP, with optimal CEs for wildlife corridors & buffering in the San Luis Valley aquifer recharge margins)

Initiative G: Plan and manage best practices & results "in self-sustaining systems that are not dependent on artificial structures." In other words, support healthy ecosystems without man-made ditches, dams, or destructive diversion gates in historic streams, wetlands, and sensitive riparian zones essential to natural hydrologic viability and proper functioning of the GSDNP Hydrogeologic Region and its ground water recharge zones.

### APPENDIX C

BLM Riparian-Wetland Habitat Conservation Program Goals (1990s)

Goal 1 :: To restore and maintain riparian-wetland areas so that at least 75% are in "proper functioning condition"

Goal 2 :: To protect riparian-wetland areas and uplands through proper land management and by avoiding or mitigating negative impacts

Goal 3 :: To carry out a riparian-wetland information and outreach program that includes training and research (to raise awareness and understanding of the importance of the health of these areas)

Goal 4 :: To maintain existing and form new public-private partnerships (to supplement and accelerate the work, drawing on the talents of volunteers and a mix of private and public funding)

Biosphere Coalition :: PO Box 351, Crestone, CO 81131 719.480.2262 / 256.4086

## Letter #2—Dave Miller

### Service Response to Letter #2

Comment form sent from: U.S. Fish and Wildlife Service  
Name: Dave S. Miller  
Organization:

NoneComment: Comments in strong support for the Draft Plan to underscore the importance of the following planning principles, assumptions and strategies:

1. Avoiding "loss and fragmentation" of the SLV wetlands, upland habitats and riparian corridors through a "strategic network of public and private conservation lands".
2. The importance of the SLV as "the most important waterbird production area in Colorado" and the need to protect these migratory birds.
3. The vital strategy of allowing a change of water rights "only if beneficial to wildlife" and once a conservation easement is in place then "no off parcel sales of surface water".
4. The long term strategy of "protecting and restoring the historic hydrologic regime of the SLV".
5. The statements in the Draft Plan calling for a conservation plan to protect species such as the SW willow flycatcher, the gray wolf and the "non-listed but climate-change imperiled American pike" are of special note and speak to the ecological sensitivity of the plan.
6. The rationale of using conservation easements rather than relying on new federal funds for conservation land acquisition is appropriately defended by stating many of the alternatives are "financially unrealistic and politically untenable."
7. The Draft Plan's sensitivity to the protection of over 100 cultural resource sites and that another 435 sites may be officially eligible for nomination is another reflection of the Plans concerns beyond the mere protection of "water and birds".
8. The propose methods for valuation of proposed easements (fair market value based on appraisals) is appropriate and I presume that official existing appraisal guidelines such as BLM's will be utilized.
9. The Draft Plan's language regarding the use of conservation easements "mean an irreversible and irretreivable commitment of resources" reflects the federal governments to marketing the easements and then enforcing them over the next 25-50 years.
10. A Comprehensive Master Resource Management/Conservation Plan and Map reflecting all the plans of all federal agencies for the entire SLV would be useful to all stakeholder groups. In the meantime, the Plans coordination with many federal and state agencies is noted and supported.

In closing, congratulations on a very comprehensive, realistic and well conceived Draft Plan for the proposed SLV Conservation Area. The Plan reflects strong staff work and agency leadership committed to the conservation of our precious San Luis Valley. Your hard work is both noted and appreciated.

Best Regards,

Dave S. Miller  
P.O. Box 896  
Crestone, Colorado  
pearlbisbeenellie@yahoo.com

Thank you for your comments and support of our agency's efforts to deliver conservation in the San Luis Valley.

## Letter #3—Glyder

### Service Response to Letter #3

Comment form sent from: U.S. Fish and Wildlife Service  
 Name: Dave S. Miller  
 Organization: None  
 Comments in strong support for the Draft Plan to underscore the importance of the following planning principles, assumptions and strategies:

1. Avoiding "loss and fragmentation" of the SLV wetlands, upland habitats and riparian corridors through a "strategic network of public and private conservation lands".
2. The importance of the SLV as "the most important waterbird production area in Colorado" and the need to protect these migratory birds.
3. The vital strategy of allowing a change of water rights "only if beneficial to wildlife" and once a conservation easement is in place then "no off parcel sales of surface water".
4. The long term strategy of "protecting and restoring the historic hydrologic regime of the SLV".
5. The statements in the Draft Plan calling for a conservation plan to protect species such as the SW willow flycatcher, the gray wolf and the "non-listed but climate-change imperiled American pike" are of special note and speak to the ecological sensitivity of the plan.
6. The rationale of using conservation easements rather than relying on new federal funds for conservation land acquisition is appropriately defended by stating many of the alternatives are "financially unrealistic and politically untenable."
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10. A Comprehensive Master Resource Management/Conservation Plan and Map reflecting all the plans of all federal agencies for the entire SLV would be useful to all stakeholder groups. In the meantime, the Plans coordination with many federal and state agencies is noted and supported.

In closing, congratulations on a very comprehensive, realistic and well conceived Draft plan for the proposed SLV Conservation Area. The Plan reflects strong staff work and agency leadership committed to the conservation of our precious San Luis Valley. Your hard work is both noted and appreciated.

Best Regards,  
 Dave S. Miller  
 P.O. Box 896  
 Crestone, Colorado  
 pearlbi@earthlink.net

Thank you for your comments and support of our agency's efforts. We recognize the importance of the Baca Grande riparian corridors to wildlife, and look forward to easement discussions with willing landowners in and around the green-belts in the Baca Grande subdivision.

## Letter #4—Margey Herrington



**mkherrin@adams.edu**  
06/02/2012 08:09 AM

To: [slVrefugesplanning@fws.gov](mailto:slVrefugesplanning@fws.gov)  
cc:  
Subject: San Luis Valley Conservation Area

Dear Sirs:

I was very pleased to read about the landscape-scale project for wildlife conservation in southern Colorado and northern New Mexico. I appreciate the work that has gone into the SLVCA project and support it wholeheartedly. I will look forward to seeing the results of this careful planning in the years ahead.

Sincerely,

Margey Herrington  
38 Morris St.  
Monte Vista, CO 81144  
719 852-0793

### Service Response to Letter #4

Thank you for your comments and support of our agency's efforts to deliver conservation in the San Luis Valley.

## Letter #5—Rockard Finley

### Service Response to Letter #4

Thank you for your comments. As in much of the west, the San Luis Valley has large areas of public lands. While there are already conservation initiatives, including state efforts, underway in the San Luis Valley, including Saguache County, the SLVCA proposes to bring another source of money to the table. Conversations with local nongovernmental organizations and other land protection entities have repeatedly emphasized that there is more demand for conservation easements among landowners than there is money available for that purpose. Regarding future changes in regulations associated with the project under another administration, the SLVCA does not include the establishment of any new regulations. The SLVCA will be a largely conservation easement focused new unit of the National Wildlife Refuge System, in which the Service will seek to buy specific, clearly define property rights from willing landowners. The Service has neither the intent nor the authority to impose regulations on nonparticipating landowners under this program.

Comments to US Fish and Wildlife Service at the open meeting in Moffat, Colorado, on May 16, 2012

I am opposed to any governmental expansion of control over any of the lands within Saguache County.

Projects such as this have in the past started out as one thing and wind up encompassing far more than ever was intended in the original project. For Example: San Luis Valley Conservation Project, continued pumping of water badly needed in the Closed Basin.

We have the LaGarrita Wilderness Area, The Sangre de Christo Wilderness Area, the Baca Wildlife Refuge, the Russell Lakes Wildlife Area, The Sand Dunes National Park (with very restrictive citizen use), the BLM and the Forest Service ( which every year becomes more restrictive for citizen use). We have enough "wildlife and fowl protection" in Saguache County to satisfy most of the environmentalists in the County. There is a Colorado Conservation Fund that is already serving the San Luis Valley and at least it is accessible at the State level.

Projects such as this one might sound more feasible if it were not coming from the most overextended federal government in the history of the United States.

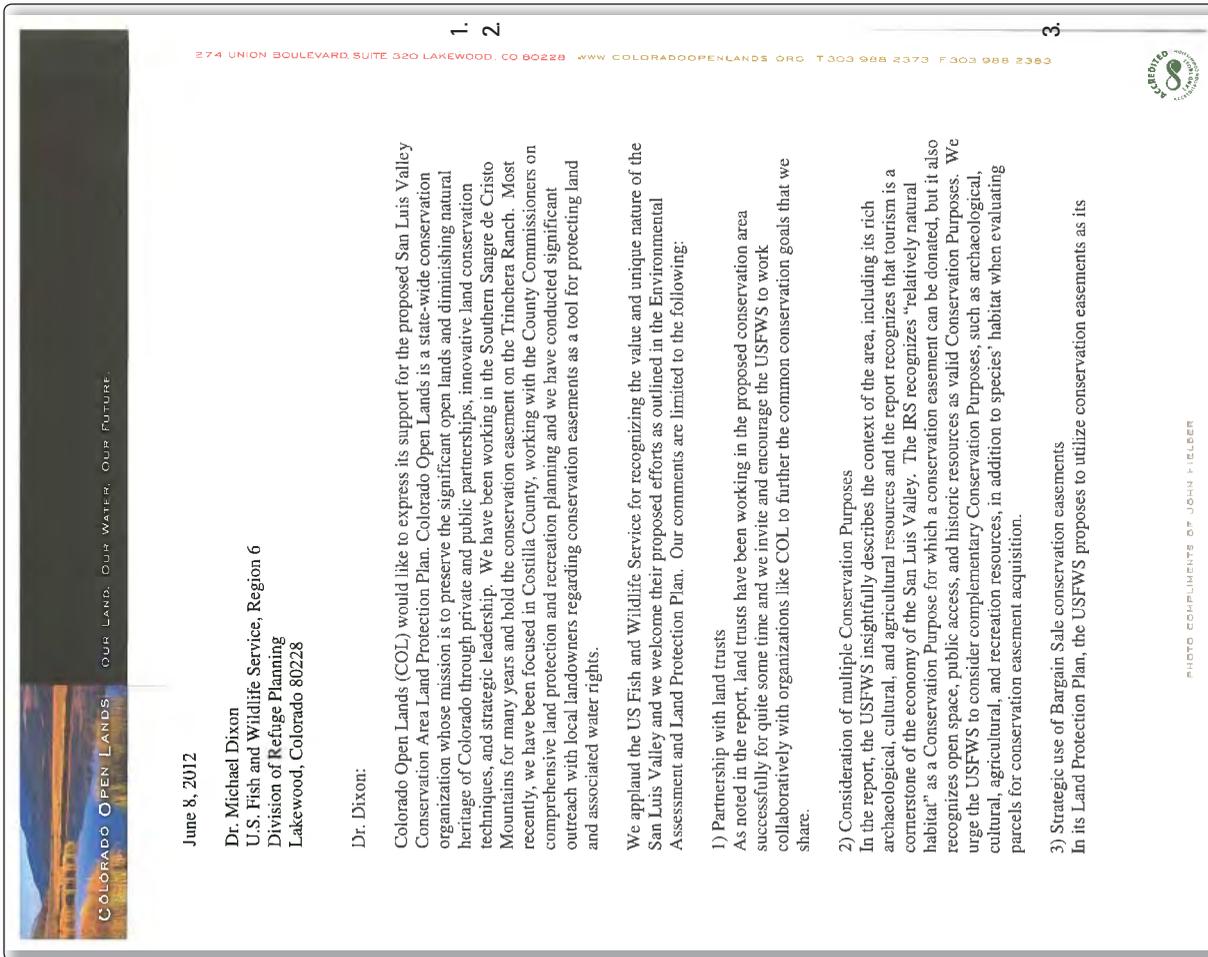
Who's to say what the regulations for such a project might be two years, 10 years, 25 years from now with changing administrations.

Ronald Reagan said " the most terrifying words in the English language are "I'M FROM THE GOVERNMENT AND I'M HERE TO HELP YOU' .

I oppose the project as an individual at present, but when elected Saguache County Commissioner, I will oppose it as a Saguache County Representative for these reasons.

  
Rockard E Finley  
514 Warden St.  
Center, CO 81125

Letter #6—Colorado Open Lands (page 1 of 2)



June 8, 2012

Dr. Michael Dixon  
 U.S. Fish and Wildlife Service, Region 6  
 Division of Refuge Planning  
 Lakewood, Colorado 80228

Dr. Dixon:

Colorado Open Lands (COL) would like to express its support for the proposed San Luis Valley Conservation Area Land Protection Plan. Colorado Open Lands is a state-wide conservation organization whose mission is to preserve the significant open lands and diminishing natural heritage of Colorado through private and public partnerships, innovative land conservation techniques, and strategic leadership. We have been working in the Southern Sangre de Cristo Mountains for many years and hold the conservation easement on the Trimchera Ranch. Most recently, we have been focused in Costilla County, working with the County Commissioners on comprehensive land protection and recreation planning and we have conducted significant outreach with local landowners regarding conservation easements as a tool for protecting land and associated water rights.

We applaud the US Fish and Wildlife Service for recognizing the value and unique nature of the San Luis Valley and we welcome their proposed efforts as outlined in the Environmental Assessment and Land Protection Plan. Our comments are limited to the following:

- 1) Partnership with land trusts  
 As noted in the report, land trusts have been working in the proposed conservation area successfully for quite some time and we invite and encourage the USFWS to work collaboratively with organizations like COL to further the common conservation goals that we share.
- 2) Consideration of multiple Conservation Purposes  
 In the report, the USFWS insightfully describes the context of the area, including its rich archaeological, cultural, and agricultural resources and the report recognizes that tourism is a cornerstone of the economy of the San Luis Valley. The IRS recognizes "relatively natural habitat" as a Conservation Purpose for which a conservation easement can be donated, but it also recognizes open space, public access, and historic resources as valid Conservation Purposes. We urge the USFWS to consider complementary Conservation Purposes, such as archaeological, cultural, agricultural, and recreation resources, in addition to species' habitat when evaluating parcels for conservation easement acquisition.
- 3) Strategic use of Bargain Sale conservation easements  
 In its Land Protection Plan, the USFWS proposes to utilize conservation easements as its

Service Response to Letter #6

Thank you for your comments and support of our agency's efforts to deliver conservation in the San Luis Valley.

1. Thank you for your comments.
2. As mentioned in #1, the many entities involved in land protection in the San Luis Valley have slightly different missions derived from their charter or enabling legislation. While we recognize the value of open space, public access, and historical resources, and some of our easements may be able to protect those values in addition to wildlife values, the Service is specifically charged by the National Wildlife Refuge System Administration Act of 1966, as amended, to "plan and direct the continued growth of the System in a manner that is best designed to accomplish the mission of the System, to contribute to the conservation of the ecosystems of the United States, to complement efforts of States and other Federal agencies to conserve fish and wildlife and their habitats, and to increase support for the System and participation from conservation partners and the public." Certainly we could contribute to fulfilling our obligation under the last part of that statement by working with organizations such as your own to find areas where we can conserve multiple values simultaneously.
3. The Service is required by law to offer a landowner fair market value. This does not preclude us from paying less than the market value (bargain purchase) if the landowner would prefer to receive less than full market value for reasons such as tax benefits. This may be an appealing choice for some landowners.

## Letter #6—Colorado Open Lands (page 2 of 2)

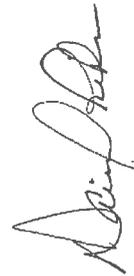
## Service Response to Letter #6

primary tool to accomplish protection objectives. We support this strategy, not only for its efficient use of public funds, but also because it illustrates the agency's understanding of local sentiment regarding fee land acquisition. The USFWS notes that it proposes to purchase conservation easements at full fair market value. In some cases, this may be ideal and appropriate; however, when there are budgetary constraints, we encourage the USFWS to consider bargain purchase of conservation easements to increase the number of landowners that may be able to participate in the program. Additionally, because income from the sale of a conservation easement is taxable income, it may be in the interest of landowners to donate a portion of their easement value to be able to take advantage of federal and state tax benefits.

4) Consideration of small land parcels (vara strips associated with acequias)  
 Costilla County encompasses multiple priority conservation areas for key species of interest as identified in the Land Protection Plan. As noted in the report, this area was settled as part of a Mexican land grant and this unique history has shaped the land ownership patterns we see today – notably, there is a stark contrast between the mountain areas (a few very large land tracts) and the valley floor (thousands of very small parcels). Some of these small tracts are the unfortunate result of a period of intense land speculation and subdivision, but others (called vara strips or long lots) are the result of the Spanish acequia irrigation system. The acequia system, tracing back to the Moors, is an irrigation system largely comprised of unlined ditches and flood irrigated agriculture which supports a healthy riparian system and species such as the Rio Grande Cutthroat Trout. Because the traditional vara strips tend to be small acreage, it is very difficult for donated conservation easements to be a financially feasible tool to protect the acequia-irrigated land and surface water rights (the oldest in the state). Consequently, we urge the USFWS to consider these lands, despite the small parcel size. COL has been working closely with acequia landowners in Costilla County and is happy to facilitate targeted outreach efforts.

We appreciate the research and careful planning that went into the Land Protection Plan and Environmental Assessment of the proposed San Luis Valley Conservation Area and we look forward to working with the USFWS to protect this special landscape.

Sincerely,



Dan Pike  
 President

4. The SLVCA LPP did not name a minimum parcel size that would be considered for the purchase of conservation easements. We recognize that there is a real conservation need in Costilla County, which is dominated by small parcels both because of the acequia system and because of subdivision in the latter part of the 20th century. We look forward to working with your organization, and will likely ask for your help with outreach to the acequia landowners in the future.

# Letter #7—Trust for Public Land

## Service Response to Letter #7

Thank you for your comments and support of our agency's efforts to deliver conservation in the San Luis Valley. It is particularly valuable to have the support of an organization with whom the Service has a strong working relationship, and that already has experience with, and recognizes the value of, conservation easements as a tool in the San Luis Valley. We look forward to working with you in the future as we move forward with our efforts to conserve the important habitats of that region.



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April 30, 2012

U.S. Fish and Wildlife Service  
Region 6, Mountain-Prairie Region  
Division of Refuge Planning  
134 Union Boulevard, Suite 300  
Lakewood, CO 80228

VIA EMAIL: [slvrefugesplanning@fws.org](mailto:slvrefugesplanning@fws.org)

Re: San Luis Valley Conservation Area

To Whom It May Concern:

I am pleased to offer The Trust for Public Land's support for the San Luis Valley Conservation Area (SLVCA) designation, a landscape-level strategic habitat conservation initiative. The SLVCA would enhance the U.S. Fish and Wildlife Service's ability to protect important wetland and upland habitats, primarily through the purchase of conservation easements from willing landowners.

The Trust for Public Land has been proud to work with traditional, multi-generational ranchers in the San Luis Valley for many years. Our work allows these landowners to permanently protect their properties, and helps ensure that these lands will remain available for agriculture for generations to come. In doing so, we have raised tens of millions of dollars from local, state, and federal sources for the purchase of perpetual conservation easements. These public investments demonstrate the importance of these landscapes not only to the local communities, but to people from across the state and country. In addition to helping preserve the viability of the agricultural industry in the Valley, these investments protect critical wildlife habitat, since most of the highest quality and threatened habitat occurs along the Valley's riparian corridors of which the vast majority are in private ownership.

The Trust for Public Land commends the U.S. Fish and Wildlife Service for proactively taking this step. We look forward to working closely with agency staff to implement the vision for the SLVCA over the coming years for the benefit of the local community, the region and the entire state of Colorado.

Sincerely,

Tim Wohlgenant  
Colorado and Southwest Director

## Letter #8—Trinchera Ranch

### Service Response to Letter #8

June 8, 2012

Dr. Michael Dixon  
U.S. Fish and Wildlife Service, Region 6  
Division of Refuge Planning  
Lakewood, Colorado 80228

Dear Dr. Michael Dixon:

Thank you and your staff for your efforts to date on the important work captured in the Draft Environmental Assessment (EA) for the San Luis Valley Conservation Area. We also appreciate the opportunity to comment on this proposal.

Based on our review of the Draft EA, and as Trinchera Ranch consists of the Trinchera and Blanca Ranches, which are both located within the proposed Conservation Area, Trinchera Ranch respectfully submits the below comments in support of the Proposed Action (Alternative B).

We are encouraged that the United States Fish and Wildlife Service (USFWS) has formally recognized this region and its environmental significance. We agree with the USFWS Draft Environmental Assessment that the land outlined in the Conservation Area deserves an official federal designation regarding its significance to the wildlife and habitat unique to southern Colorado and northern New Mexico.

We fully support your efforts as outlined in the Draft EA and again, urge USFWS to adopt the Proposed Action and finalize this important and significant conservation effort.

Sincerely,

Trinchera Ranch

Thank you for your comments and support of our agency's efforts to deliver conservation in the San Luis Valley. The backing of land holders and ranchers in the valley will be invaluable to the success of this conservation initiative.

**Letter #9—Tri-State Energy (page 1 of 3)**

**Service Response to Letter #9**



**TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.**  
**HEADQUARTERS:** P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111

June 8, 2012

Lauree Shannon  
 Planning Team Leader  
 Division of Refuge Planning  
 P.O. Box 25486  
 Denver, CO 80225

RE: Response to Request for Comments on the U.S. Fish and Wildlife Draft Environmental Assessment (EA) and Land Protection Plan (LPP) - San Luis Valley Conservation Area

Dear Ms. Shannon:

Tri-State Generation and Transmission Assoc., Inc. (Tri-State) is a not-for-profit wholesale electric power producer/supplier that serves 44 rural electric cooperatives and public power districts in Colorado, Nebraska, New Mexico and Wyoming. Tri-State's member distribution systems serve nearly 578,000 metered customers (translating to a population of more than 1.4 million people). Tri-State's 250,000-square-mile member service territory includes all or parts of 56 of Colorado's 64 counties, all or parts of 27 counties throughout New Mexico, all or parts of 20 counties in western Nebraska and all or parts of 14 counties in central and northern Wyoming. Tri-State's transmission system includes approximately 5,213 miles of high-voltage transmission line and 135 substations and switching stations. Tri-State, and its member/owner San Luis Valley Rural Electric Cooperative, Inc., (SLVREC) own and operate transmission and distribution lines and substations within the proposed San Luis Valley Conservation Area. Through our electric systems, Tri-State and SLVREC provide the power that supports the economy and the lifestyles of those living in the San Luis Valley.

Tri-State respectfully submits the following comments on the Draft EA and LPP for the San Luis Valley Conservation Area.

Tri-State utilizes a comprehensive siting and routing approach for all new transmission and substation facilities. Tri-State attempts to utilize designated corridors, parallel existing utility rights-of-way (ROW), disturbed areas, and existing access to the greatest extent feasible to minimize overall environmental impacts from projects. This routing process allows us to carefully evaluate environment and locate transmission lines outside of sensitive habitats, land uses, etc. to the greatest extent feasible. For future long linear utility projects, complete avoidance of the proposed San Luis Valley Conservation Area is likely infeasible.

**Development Restrictions**

The EA indicates that the Service "...may place development restrictions on parcels of land and seek to guide development into areas with lower conservation priority." "One of the Service's high-priority objectives is to guide residential and commercial development away from high priority conservation areas by securing appropriate conservation easements." Tri-State requests the Service consider the effects to linear utility projects in their attempt to limit development in areas of higher conservation priority and allow it in lower conservation priority areas.

Given the proposed extent of habitat to be conserved over time, it will be difficult if not impossible to site transmission facilities entirely outside of priority habitat areas and areas currently proposed to be placed under conservation easement. Tri-State requests that the Service's EA considers the allowance for utility

**Development restrictions**

We agree with the commenter that the network of lands of conservation importance that the Service aims to protect is spread throughout the valley, and thus it would be difficult to site transmission facilities entirely outside of these lands. Certainly the environmental consequences of this type of development are often lower if they follow existing disturbed corridors such as roads, as the commenter observes. We are sensitive to Tri-State's obligations to serve their member and owners, and would like to reassure the commenter that the presence of a Service easement does not, in and of itself, preclude the construction of a power line corridor unless language to that effect is specifically inserted into an easement because of a known environmental risk that cannot be mitigated, or at the request of the landowner selling the easement. If such language is not included in the easement (that would be the typical situation), the refuge manager would follow the Service policy on compatibility determination to make sure that the proposed power line would not be in conflict with the stated purpose of the conservation area. If the power line were deemed compatible, the refuge would issue a special use permit to the company wishing to develop the power line. Following construction of the power line, the value of the resulting right-of-way would be found, the permittee would be billed the cost of the right-of-way plus nominal fees for administrative costs, and a right-of-way would be issued.



DEMING STATION (K&A, CO 81009180) 953-621-4411  
 ESCALANTE STATION (H&M, UT 84001000) 953-276-2271  
 NUCLA STATION (M&K, CO 84241000) 970-848-7336

## Letter #9—Tri-State Energy (page 2 of 3)

### Service Response to Letter #9

Ms. Laurie Shannon  
June 8, 2012  
Page 2.

corridors within conservation easements where appropriate, especially where such corridors could be located along existing linear features (i.e., roads, other transmission, etc.). Tri-State understands that habitat fragmentation can be a concern when new development is proposed. However, with careful transmission routing and design measures we believe we can minimize impacts to the environment. Areas with existing disturbances such as existing roads and existing linear rights-of-way could qualify as suitable areas to allow utilities to benefit local communities, etc.

In addition, while Tri-State's routing process seeks to minimize impacts to resources of concern and sensitive land uses, the general location of electric facilities is dictated by the location of the electrical need. For example, electric transmission line projects are typically initiated through an electrical system planning process that identifies a "point A to B" project need. Environmental review and routing studies are performed to determine more specific routing alternatives to evaluate and eventually identify a preferred route. The routing process will take into account sensitive areas, but due to their linear nature, some electric transmission projects would likely cross both resources of concern and sensitive lands.

Tri-State is obligated to serve the power requirements of our Member/owners as well as maintain a reliable power delivery system. Restricting residential and commercial development except in areas with low conservation priority is a lofty goal. Even if residential and commercial development is curtailed in the higher priority areas, utility infrastructure may have to cross higher priority areas in order to provide services in areas deemed suitable for development by the Service. Tri-State would like to work with Service to ensure we are able to meet our responsibility of providing power to customers in and around the San Luis Valley.

Tri-State is concerned with the language in the Cumulative Effects section of Chapter 4, page 42, the second paragraph states "the presence of a Service interest in land could preclude construction of commercial energy production or transmission infrastructure on that property if such activity is deemed to be incompatible with the purpose of the SLVCA." Chapter 4, page 57 has similar language pertaining to restricted development. It is not clear what process the Service will use to determine if project is incompatible with the purpose of the SLVCA project and impacts from such restrictions are not described.

#### Renewable Energy

The EA states "Prospective solar development in the local area is supported by Federal initiatives and funding from the U.S. Department of Energy. The growth of the solar industry, however, is dependent on the ability of solar producers to obtain power purchase agreements from Public Service Company of Colorado and may also be dependent on the future provision of transmission lines out of the valley." (Colorado Department of Local Affairs 2011).

The Cumulative Impacts section in Chapter 4 page 41 identifies a proposed transmission line "through the valley, crossing the Sangre de Cristo Mountains at La Vera Pass. Planning for that corridor has stalled; however, interest in building another corridor to promote energy reliability is ongoing."

The EA analysis fails to specifically address how this project would affect federal and state renewable energy standards and also fails to discuss the potential impacts to utilities that need to provide their customers with required electrical service. Impacts to energy projects should be identified and disclosed.

#### Renewable energy

The impact of a proposed easement program on state and federal renewable energy standards would be speculative at best, particularly because the compatibility of renewable energy infrastructure is highly dependent on the location of such infrastructure. It may even be compatible for a landowner to develop new energy infrastructure on one part of a property under easement, but not others. Such speculation is well outside the scope of this analysis.

**Letter #9—Tri-State Energy (page 3 of 3)**

**Service Response to Letter #9**

Ms. Laurie Shannon  
June 8, 2012  
Page 3

**Habitat Priority Maps**

The habitat maps included in Chapter 4 - Project Implementation show large scale overviews of priority habitat according to priority species, which were identified through landscape modeling. Have these areas been assessed on the ground and did they take into account existing infrastructure and disturbance? Additional site specific analysis and mapping of resources and existing infrastructure in the proposed conservation areas would help identify areas where mutual objectives for habitat conservation and commercial and industrial development needs can be met.

**Socio-Economics**

The socio-economic section does not address the project's impact to the energy and electrical industry, or commercial or residential developers. It fails to address how the project could affect the ability to provide reliable power to meet load requirements in this area. Restricting commercial, residential or utility development in the San Luis Valley might have adverse effects on communities both inside and outside of the Valley who could be affected by restricting development options.

**The NEPA Process-Scoping**

In reading Chapter 5, Coordination and Environmental Review, it appears that the Service reached out directly to other agencies, NGOs, land trusts, and local governments, but there is no mention of industry consultants. Industry was included as part of the general public scoping, though neither Tri-State nor SLVREC received scoping letters. Working with industry and local developers during the conservation planning process would ensure an open dialogue occurs regarding the conservation of species and habitats while ensuring other federal policy objectives and local utilities services needs can be met as well. Please include us going forward.

Thank you for the opportunity to comment on these important issues. Please feel free to contact me at 303-254-3211 or Karl Myers 303-254-3448 with any additional questions on our response.

Sincerely,



Rick L. Thompson  
Senior Manager, Transmission Land Rights Unit  
Permitting

**Habitat priority maps**

Except for the southwestern willow flycatcher data that was produced in part by on the ground surveys associated with the development of the San Luis Valley Habitat Conservation Plan, the habitat priority maps were created solely from remote sensing data or existing data layers. They are meant to serve as a general primer to inform the public and Service really staff on the types of habitats that are biologically important. No easements would be granted without on-the-ground surveys to decide if the land truly holds conservation value.

**Socioeconomics**

Our analysis did not uncover any impacts to on the socioeconomic environment that are likely to be significant. Furthermore, per NEPA regulations, the purpose of an environmental assessment is to find if there are significant impacts on the human environment (the relationship between people and the biological and physical environment) that would require the preparation of an environmental impact statement, and "economic or social effects are not intended by themselves to require preparation of an environmental impact statement." (Sec.1508.14).

**The NEPA process – scoping**

We apologize that Tri-State was overlooked during our scoping process. It is challenging to account all possible entities. We will include you in further correspondence related to the project.

## Letter #10—Costilla County



**COSTILLA COUNTY**  
**BOARD OF COUNTY COMMISSIONERS**  
*"Where Colorado Began"*

352 Main Street  
 PO Box 100  
 San Luis, CO 81152  
 (719) 872-3372  
 (719) 872-3962 fax  
[www.costillacounty-co.gov](http://www.costillacounty-co.gov)

April 12, 2012

Ken Salazar  
 Secretary of the Interior  
 U.S. Department of the Interior  
 1849 C Street NW  
 Washington, D.C. 20240

Dear Secretary Salazar,

The Costilla County Board of Commissioners is writing you to express our support for the land protection planning efforts proposed by the U.S. Fish and Wildlife Service. We understand that establishment of the San Luis Valley Conservation Area will allow the U.S. Fish and Wildlife Service to acquire conservation easements from willing landowners based upon the following principles:

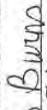
1. Protection efforts will be guided by priority biological needs of species entrusted to the U.S. government. In the case of the San Luis Valley this means migratory birds and species listed or being considered for listing under the Endangered Species Act.
2. Conservation easements would be acquired only from willing sellers following the U.S. Fish and Wildlife Service policy of acquiring the minimum property rights needed to achieve conservation goals.
3. Acquisition of conservation easements would be conducted in collaboration with the land protection community active in the San Luis Valley.
4. Acquisition of easements would be limited by availability of appropriated funds, primarily the Land and Water Conservation Fund (recognizing some rights might be donated to the Service).

These principles are consistent with Costilla County's Trails, Recreation and Open Space Master Plan project and our overall goal to balance natural resource protection of the county while maintaining the present working landscape, which is so important to our economy and culture.

We look forward to working with the Department of the Interior and U.S. Fish and Wildlife Service in Costilla County on this important project.

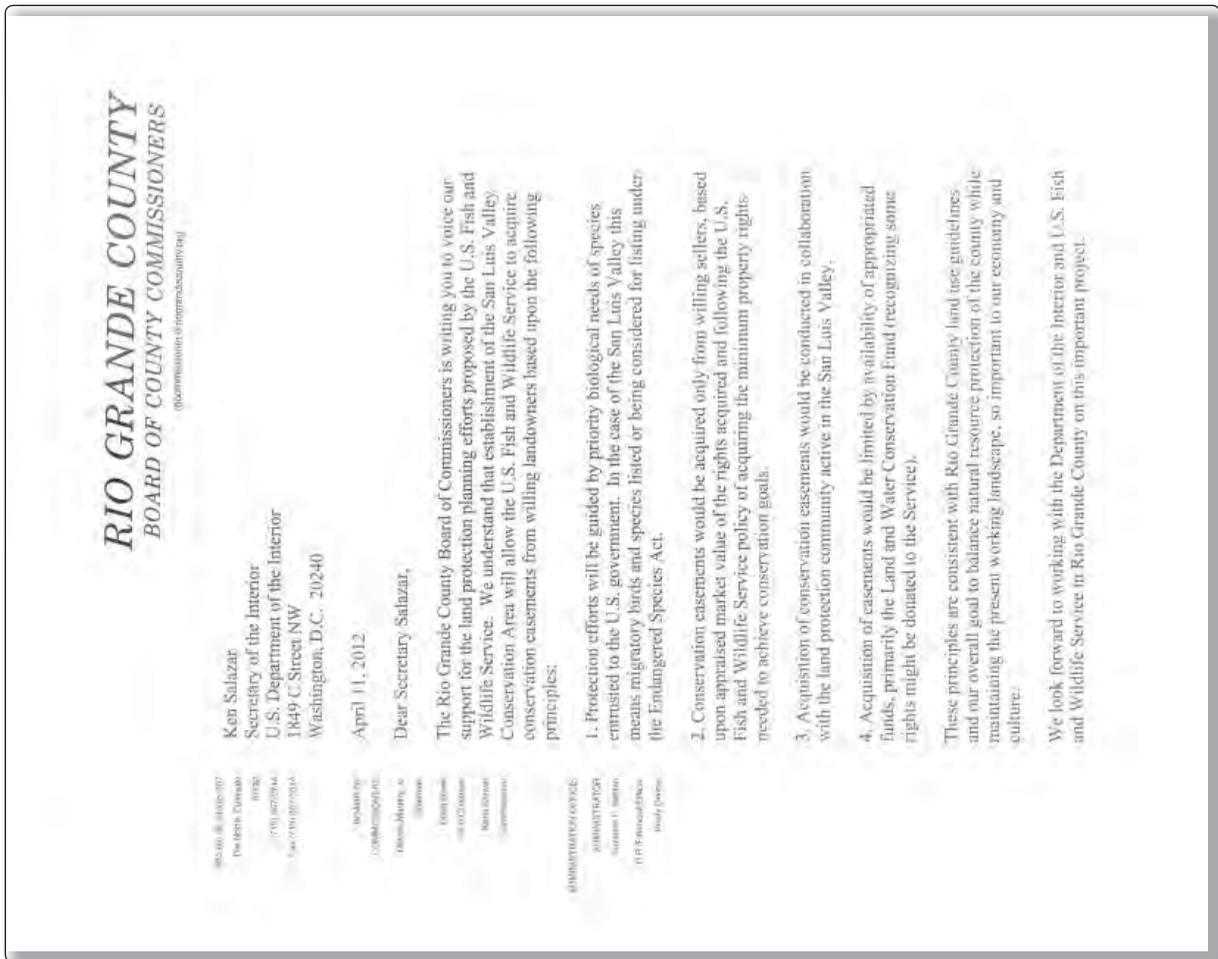
Sincerely,

COSTILLA COUNTY BOARD OF COUNTY COMMISSIONERS:

  
 Dolores Burns, Chair

DOLORES BURNS, CHAIR    CRESTINA MARTINEZ, VICE-CHAIR    EDDIE ROYBAL, COMMISSIONER TO CONVEY

**Letter #11—Reio Grande County (page 1 of 2)**



Letter #11—Reio Grande County (page 2 of 2)



Letter #12—Saguache County



SAGUACHE COUNTY GOVERNMENT

501 Fourth Street • P. O. Box 655  
Saguache, Colorado 81149  
Phone: (719) 655-2231 • Fax: (719) 655-2635

April 10, 2012

Kent Salazar  
Secretary of the Interior  
U.S. Department of the Interior  
1849 C Street NW  
Washington, D.C. 20240

Dear Secretary Salazar,

The Saguache County Board of Commissioners is writing you to voice our support for the land protection planning efforts proposed by the U.S. Fish and Wildlife Service. We understand that establishment of the San Luis Valley Conservation Area will allow the U.S. Fish and Wildlife Service to acquire conservation easements from willing landowners based upon the following principles:

1. Protection efforts will be guided by priority biological needs of species entrusted to the U.S. government. In the case of the San Luis Valley this means migratory birds and species listed or being considered for listing under the Endangered Species Act.
2. Conservation easements would be acquired only from willing sellers, based upon appraised market value of the rights acquired and following the U.S. Fish and Wildlife Service policy of acquiring the minimum property rights needed to achieve conservation goals.
3. Acquisition of conservation easements would be conducted in collaboration with the land protection community active in the San Luis Valley.
4. Acquisition of easements would be limited by availability of appropriated funds, primarily the Land and Water Conservation Fund (recognizing some rights might be donated to the Service).

These principles are consistent with Saguache County land use guidelines and our overall goal to balance natural resource protection of the county while maintaining the present working landscape, so important to our economy and culture.

We look forward to working with the Department of the Interior and U.S. Fish and Wildlife Service in Saguache County on this important project.

Sincerely,

Mike Spearman, Chairman  
Saguache County Board of Commissioners

511305

## Letter #13—Rio Grande Water Conservation District (page 1 of 5)



THE SECRETARY OF THE INTERIOR  
WASHINGTON  
June 29, 2012

George Whitten Jr., President  
Rio Grande Water Conservation District  
Saguache County  
52501 CR U  
Saguache, CO 81149

Dear Mr. Whitten:

You know how much I respect you and the members of the Rio Grande Water Conservation District. Over the years, I have given much of my life to battle the forces that threaten the water supplies of the San Luis Valley and the sustainable agriculture lifestyle that depends on that water supply. That has been my north star in my public service roles that have included Director of the Department of Natural Resources, Colorado Attorney General, United States Senator, and United States Secretary of the Interior. That is why I found the substance and tone of your June 8, 2012, letter regarding the proposed San Luis Valley Conservation Area and Land Protection Plan to be very troubling.

Over the many years, I worked with many people in the San Luis Valley to fight against the threats brought by American Water Development Inc. (AWDI) and the so-called "Son of AWDI." I also helped lead the efforts to defeat statewide political initiatives on the ballot that were intended to provide opportunities to drain the San Luis Valley aquifers for water supplies to the north, or as punitive measures against San Luis Valley efforts to protect its way of life. Indeed, when a former State Engineer and Attorney General were ready to consent to an AWDI proposed water decree, I stopped them because of the precedential effect the decree would have created.

I am also proud of the work I did in helping create the Great Sand Dunes National Park and its associated protection of the Valley's water resources.

As part of the President's and my commitment to all of rural America, we have ushered in a new era of opportunity for rural communities around the Nation, including our efforts on commodity exports, broadband to rural America, and investments in rural infrastructure. The San Luis Valley, like other parts of the United States, deserves no less attention.

Because of this focus on rural America, we have worked in various places in Colorado, including the San Luis Valley. In the San Luis Valley, local communities and the State identified key priorities for us, including the possibility of creating a national historical park, a system of recreational trails, and additional conservation areas. These initiatives, if implemented, would help diversify the economy of the San Luis Valley through enhanced tourism, hunting, fishing and heritage preservation.



### Rio Grande Water Conservation District

10900 Highway 160 East • Alamosa, Colorado 81101  
Phone: (719) 589-6301 • Fax: (719) 589-4331  
*Protecting & Conserving San Luis Valley Water*

June 8, 2012

Secretary Ken Salazar  
Secretary of the Interior  
1849 C. Street, NW  
Washington, DC 20240

Re: **San Luis Valley Conservation Area (SLVCA) and Land Protection Plan (LPP)**

Dear Secretary Salazar:

At the Rio Grande Water Conservations District's quarterly meeting, held on April 17, 2012, the highly respected Project Leader for the U.S. Fish and Wildlife Service, Mr. Michael Blenden, appeared before the Board of Directors to explain the above-referenced program. He did a thorough job of explaining the concept proposal and requested that the Board of Directors prepare a letter to you in support. Several weeks later the LPP and associated Environmental Assessment (EA) were made available for our review.

At the time of Mike's presentation a series of questions and concerns about the program and how it would interact with other initiatives currently ongoing in the San Luis Valley were expressed by the Board and staff. Now, as the result of our review of the actual proposed SLVCA, the LPP and its EA, several other concerns and comments have arisen. The Board directed that I provide these comments to you concerning the proposed SLVCA and the LPP in lieu of a letter of support.

Our initial concern was that you should be aware of two specific programs that our District has sponsored in an effort to insure that landscape values and species protection were addressed in manner that was based on grassroots support and which sought to provide realistic and effective solutions that water users and land owners could buy in to without being subjected to the mandates or coercion of the Federal government. The first of the two programs to which I refer is the Rio Grande Natural Area, established by Congress in 2006 by PL 109-337 (16 USC 460rrr), which has as its current principal goal the development of a management plan for the riparian corridor of the Rio Grande. The management plan will apply to private land and will be coincident with the management plan for adjacent public land along the Rio Grande riparian corridor. The purpose of the management plan is to restore and protect the riparian ecosystem in

## Letter #13—Rio Grande Water Conservation District (page 2 of 5)

We are making progress on each of these initiatives. With respect to the proposed the San Luis Valley Conservation Area, I anticipate the focus will be on the Sangre de Cristo Mountain range, which essentially will protect the watershed of the Sangre de Cristo Mountains south of the Great Sand Dunes. Without this major conservation project in the Sangre de Cristo Mountains, that part of the watershed, which feeds the intricate water sources of the San Luis Valley and helps sustain the Valley's agricultural economy, would not be protected.

As noted in the *Valley Courier* June 16, 2012, news story titled "A breathtaking act of generosity," I believe we should all applaud Mr. Bacon's intended donation of the conservation easement on the Blanca Ranch.

I understand that the floor of the San Luis Valley is another matter because of its complex land ownership and already existing programs. That is why I have instructed the United States Fish and Wildlife Service to ensure that it works closely with the residents of the San Luis Valley, including governmental organizations such as the Rio Grande Water Conservation District, before moving forward with additional conservation areas on the Valley floor.

As the Secretary of the Interior, I have significant roles and authority concerning the Closed Basin Project, Piattoro Reservoir, and many other water and public land matters that affect the San Luis Valley. I hope the Board of the Rio Grande Water Conservation District would recognize my work is guided by the same principles of preserving the Valley's water and protecting its agricultural economy that have guided my water, agriculture and conservation efforts for the last three decades.

I am aware the District and the United States Fish and Wildlife Service have had productive discussions regarding the proposed conservation efforts and the District's concerns, and I urge that continued constructive dialogue.

Please again know how much I appreciate the leadership and the members of the Rio Grande Water Conservation District. I would ask you as Chairman to call me directly on any matter of concern that you might have. My telephone number is 202-208-6087.

Respectfully,  
  
 Ken Salazar

CC: Brian David  
 Lewis Eniz  
 Greg Higel  
 Dwight Martin  
 Mike McClure  
 Cory Off  
 Kent Palmgren  
 Steve Vandiver  
 Michael J. Willett

this reach of the river through local cooperation instead of through federal mandate or control. The Rio Grande Natural Area Commission is in the process of developing the management plan at this time.

The second of the two programs involves the development of the San Luis Valley Habitat Conservation Plan (HCP) for the Southwestern Willow Flycatcher and the Yellow-Billed Cuckoo. Over the course of the last ten years, the District has spent tens of thousands of dollars and thousands of hours on the development of this plan, as has the State of Colorado and the U.S. Fish and Wildlife Service. It is important to note that a fundamental underpinning of this plan is the availability of privately funded and held conservation easements and other habitat protection measures that provide the mitigation bank upon which the HCP is predicated. With the mitigation bank in place, it has been anticipated that the agricultural community in the San Luis Valley would be able to continue to manage the privately held lands containing Flycatcher habitat in a way that does not interfere with their agricultural operations, but still maintains the mosaic of habitat that has historically provided successful conditions for the Flycatcher. As your staff has undoubtedly told you, the HCP has been effectively completed and we are only awaiting final comments from the U.S. Fish and Wildlife Service. In fact, at the April 17<sup>th</sup> Board meeting, the Board approved the submission of the application for an incidental take permit. This is the final stage of the internal HCP drafting process and the initial step for the public comment stage of the HCP. One of the requirements of the draft HCP is that land that is acquired and held for conservation purposes by federal agencies using federal dollars is not eligible for mitigation credit under the HCP. As you can undoubtedly understand the proposal which Mike Blenden described to our Board and that is contained in the LPP appears to frustrate these grassroots efforts by seeking to transfer conservation easement acquisition from private control or Non-Governmental Organization (NGO) control into the hands of a federal agency, thereby defeating the mitigation opportunity that might have been available to insure the success of the HCP.

The District Board does not understand why it is now important to the Federal government that conservation easements be acquired and held by a Federal agency when our local organization, with the support of the land owners and water users, has over the last ten years developed and provided completely viable alternatives to protect the Rio Grande riparian corridor and the Southwestern Willow Flycatcher habitat that is not top-down management, but is rather a grassroots community supported effort to achieve the same results.

We would also like to express our concern that the ongoing conservation easement program operated by the Rio Grande Headwaters Land Trust (RIGHT) not be placed in a position of competition or that it be overshadowed by competing federal efforts. RIGHT is one of the most successful land trusts in the Rocky Mountains and has a long and distinguished record of protecting conservation values while maintaining the land owners rights and interest in the property. In particular RIGHT has been instrumental in acquiring many thousands of acres of easements on riparian land that is usable by the Flycatcher HCP as mitigation. It seems unnecessary, duplicative and certainly overly bureaucratic to suggest that federal money ought to be spent on the acquisition of similar easement by federal agencies instead of encouraging, applauding and supporting the efforts of RIGHT and the cooperating land owners.

To the extent that the Federal government has extra resources we would encourage you to reconsider your proposal and to instead make those resources available to organizations like

## Letter #13—Rio Grande Water Conservation District (page 3 of 5)

RIGHT so that they can be included in the current and ongoing private conservation easement efforts in the San Luis Valley. The goals are the same, but the tools are significantly different.

Mr. Secretary, after reviewing the actual written materials developed by the U S Fish and Wildlife Service, we must tell you that we cannot support the SLVCA. The reason for that position is made apparent at page 5 of the EA where the statement is made that "the SLVCA will be part of the National Wildlife Refuge system, whose mission is "to administer a national network of lands and waters for the conservation management and where appropriate, restoration of the fish, wildlife and plant resources and their habitat within the United States for the benefit of present and future generations of Americans." Because your proposed action is to acquire easements covering up to 500,000 acres of private land within the San Luis Valley and because the map defining the proposed SLVCA incorporates effectively all of the productive agricultural land in the San Luis Valley we believe it is inappropriate for you to proceed under these terms. We do not want to live within a part of the National Wildlife Refuge system. We value the refuges as neighbors but not as our big brother.

Secondly, as a general comment, throughout the EA there are constant references to the SLVCA's goal of restoring the hydrology of the San Luis Valley. These statements are made in the context of the allegedly adverse impacts on that hydrology that occurs as a result of the social and economic activities of the very citizens of the Valley whose livelihoods are dependent upon those modifications to the hydrology. In reading the EA, it is immediately apparent that among the significant purposes behind the SLVCA is the acquisition of land and the associated water rights. We do not support the conversion of existing senior water rights to federal control. In particular, we do not support the acquisition of water rights by the federal government so that "the exercise of water rights associated with these lands could be changed only if the proposed changes would be beneficial to wildlife." Unfortunately, in reading the EA, there is little relationship to the general description provided to us by Mr. Blendon at our April meeting and there is little or no recognition of efforts of the local citizens to address these same issues without significant federal control.

Some limited additional comments are in order. In Chapter 3, Water and Hydrology, the description of "Surface Water" is utterly inadequate. It completely fails to describe the interrelationship between diversions through canals from the Rio Grande and other streams and the wetlands and water supplies in the Closed Basin. It fails to identify significant contributory streams to the San Luis Valley and it bounces back and forth between discussions of the San Luis Valley generally and the Closed Basin system. It is confusing and generally misleading. In the "Groundwater Section" of Chapter 3, there are also statements that are misleading or inaccurate. In the first paragraph there is the assertion that in the groundwater system there are "more than 140 million acre-feet estimated to be recoverable." Obviously the author is utterly uninformed given the existing efforts to ensure that no further groundwater development occurs within the San Luis Valley and that all depletions from existing groundwater use that create injurious depletions to surface streams are replaced. It is not physically possible to "recover" further groundwater without greatly exacerbating the very problems that other sections of the EA suggest the SLVCA could help resolve. Although the members of our Board have spent considerable time reading about the San Luis Valley and its geology and hydrology, no one is aware of any report suggesting that the Valley fill is anywhere near 30,000 feet thick. To the contrary, most learned papers suggest that the fill material is approximately half that thick and a

## Letter #13—Rio Grande Water Conservation District (page 4 of 5)

significant portion of it, although made up of sedimentary material, is not water bearing. Further, some significant portion of the deepest aquifers is highly saline and effectively unusable. The discussion about the interaction between the Confined Aquifer, the Unconfined Aquifer and the surrounding environment is similarly confusing and misleading.

In the portion of Chapter 3 that addresses the early history, your authors imply that the "Baca Land Grant" is in fact a land grant. Contrary to the assertion in the article, a Colorado District Court has determined that the Baca Ranch is not a Spanish or Mexican land grant at all but is, in fact, a patent from the Congress of the United States. No land grant, as such, was ever confirmed at the location of the Baca No. 4 and to refer to this congressionally patented land as a "land grant" is misleading and inaccurate. The Colorado Supreme Court subsequently confirmed the District Court's determination that no Spanish or Mexican land grant exists at the location of Baca No. 4.

Of probably the greatest concern to our District and our citizens in the San Luis Valley is the discussion on pages 30, 31 and 32 of the Environmental Assessment under the heading "Changes in Land Use." This discussion makes it abundantly clear that it will be the ultimate goal of the U S Fish and Wildlife Service and the federal government to try and prevent or impede opportunities to protect and enhance economic development in the San Luis Valley in order to "preserve the landscape from alteration." In particular, the discussion where the efforts to require the replacement of injurious depletions by several means, including the purchase of senior water rights, is of great concern. We believe that the expressed desire to intervene through the federal purchase of senior water rights to prevent the irrigation and well economy in the San Luis Valley from taking the steps necessary to replace those injurious depletions is frightening, offensive and directly contrary to the economic interests of the people of the San Luis Valley. In particular, the full paragraph at the head of page 32 makes it absolutely clear what the Service's intentions will be and how directly contrary they are to the agricultural and economic interests of the San Luis Valley community. Water right transfers are an inherent and necessary aspect of the Colorado water rights system. Moving water from one use to another and utilizing consumptive use credits generated by retiring senior water rights to allow other uses to occur is at the heart of that system. This proposal aims to interfere with the efforts of the District and the Valley's farm community to achieve a sustainable water system. It is not an acceptable position for a federal agency to adopt.

The Board of Directors of the District certainly understood Mr. Blendon's need to present strong advocacy for this program. He is our friend and we respect him. However, we do not believe that the full effect and implications of this program have been adequately considered and we sincerely request that you allow additional time to allow the U S Fish and Wildlife Service to consider how the goals of the SLVCA might be achieved without the inclusion of all of our private property into the National Wildlife Refuge System, the imposition of federally held conservation easements on our community and the use of conservation to interfere or prevent the development of successful well depletion replacement programs.

We trust that you are fully aware of our commitment to agricultural sustainability, protection of the environment and the species that inhabit our valley, but our community wishes to do so in a way that is driven by our local efforts not through the imposition of a federally mandated program. To the extent that there are funds available to advance these goals we

**Letter #13—Rio Grande Water Conservation District (page 5 of 5)**

certainly stand ready to work with you to achieve them using our local initiatives, but we don't wish to do so through a program that simply increases the federal role in managing our private lands and hampers the long-term goals of the community.

Very truly yours,

STEVEN E. VANDIVER



George Whitten  
President

cc: Board of Directors  
Steven Vandiver, General Manager  
David W. Robbins, General Counsel  
Board of Commissioners of Alamosa, Rio Grande, Saguache, Conejos and Mineral Counties  
Alan Gilbert, Senior Advisor to the Secretary, SW and Rocky Mountain Regions  
Rio de la Vista, RIGHT  
Christine Arbogast



# Appendix E

## *Finding of No Significant Impact*

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**U.S. Department of the Interior  
FISH AND WILDLIFE SERVICE  
Region 6, Denver, Colorado**

**FINDING OF NO SIGNIFICANT IMPACT**

**Sangre de Cristo Conservation Area  
Costilla County, Colorado and Taos County, New Mexico**

The U.S. Fish and Wildlife Service (Service) has completed the *Sangre de Cristo Conservation Area Land Protection Plan and Environmental Assessment*. This planning process considered the authorization of a new unit of the National Wildlife Refuge System, the Sangre de Cristo Conservation Area. The Service conducted a National Environmental Policy Act (NEPA) review of the proposed easement program. The resulting Environmental Assessment (EA) evaluates two alternatives: Alternative A, a no action alternative; and Alternative B, the preferred alternative, to establish the Sangre de Cristo Conservation Area.

Alternative B, the preferred alternative, was selected for implementation because it best meets the Service's mission to sustain fish and wildlife populations and to conserve a network of lands that provide their habitats. The Sangre de Cristo Conservation Area will use conservation easements to conserve these habitats in a working agricultural landscape by maintaining current land management practices while preventing the conversion of native vegetation to other uses. In so doing, this project will protect habitat for federal trust species of wildlife, the water quality of the upper Rio Grande River, and the rural agricultural aesthetic which defines the region.

### Public Involvement

As part of the public scoping process associated with this action, comments were solicited from the public through news releases and public meetings. On March 15, 2011, a press release was issued by the USFWS Region 6 which announced the beginning of the NEPA review and solicited scoping comments from the public. Public scoping meetings were held March 29, 30, and 31, 2012 in Alamosa, Monte Vista, and Moffat, Colorado, respectively. Everyone in attendance was given an opportunity to express their ideas and concerns. Approximately 50 people attended these meetings, and an additional 14 written comments were received and used to define the scope of the NEPA review and identify potential issues. On January 4, 2012 in Alamosa, CO the Secretary of the Interior held a public and media event to highlight San Luis Valley projects under the America's Great Outdoors initiative, of which the Sangre de Cristo Conservation Area was a component. This was followed by a news release on May 9, 2012 which announced the release of a draft environmental assessment and land protection plan (LPP) for 30 days of public comment. Formal public meetings were held on May 14, 15, and 16, 2012 in Alamosa, San Luis, and Moffat, Colorado, respectively. The public comment period ended on June 8, 2012. In addition to comments presented by some of the approximately 50 people who attended these meetings, another 14 written comments were received from individuals, NGOs and agencies. Public comments and responses are included as appendices in Appendix D of the LPP/EA.

### Effects of Proposed Action

This EA has taken a hard look at the environmental impacts to inform the public and ourselves about the consequences of the proposed action (the Service's preferred alternative).

In determining whether this project is a major action significantly affecting the quality of the human environment, we looked at both the context and intensity of the action (40 CFR § 1508.27, 40 CFR § 1508.14) as required by NEPA. In terms of context, the preferred alternative will occur on the western slope of the central Sangre de Cristo mountains in south central Colorado and north central New Mexico, but we have evaluated whether it will have effects on the human environment on a broader scale. The project will be implemented over time, dependent on the Service's ability to obtain funding needed for easement acquisition. Of the roughly one million acres within the overall project boundary, easements may be purchased by the Service only from willing sellers on a strictly voluntary basis on up to 250,000 acres. Because the human environment is interpreted by NEPA to mean the natural and physical environment and the relationship of people with that environment (40 CFR § 1508.14), in addition to our thorough analysis of physical environmental effects, we carefully assessed the manner in which the local people and natural resources relate to the environment in the San Luis Valley, though economic or social effects are not intended by themselves to require the preparation of an environmental impact statement (40 CFR § 1508.14).

Establishment of the Sangre de Cristo Conservation Area would enable the Service to seek permanent protection for important wildlife habitat for federal trust species including the federally threatened Canada lynx, the candidate Rio Grande cutthroat trout, and migratory birds such as the southwestern willow flycatcher and sage thrasher, as well as over 300 other species of birds. This protection would also positively benefit state-managed species such as bighorn sheep and elk.

Conservation easements in the Sangre de Cristo Conservation Area would increase the capacity for ecosystems in that region to adapt to climate change and increase their resiliency to temporary environmental disturbances such as drought and fire. These benefits would result from ensuring connectivity between permanently protected areas to the north and south of the conservation area, which will allow migration and colonization by variants better adapted to changing conditions. Easements will also prevent the negative local effects of habitat fragmentation resulting from land cover changes due to subdivision and infrastructure development.

The easements would be a source of capital for local landowners. It is likely that much of this money would be reinvested locally, so easements in the Sangre de Cristo Conservation Area may be a one-time positive benefit to the local economy. By placing restrictions on where willing landowners could build structures, the Sangre de Cristo Conservation Area would affect the location and distribution, but not the rate or density, of human population growth in the project area. There may be benefits to non-participating landowners due to the preservation of habitat which may provide for wildlife-dependent recreation off of easement lands, and due to the preservation of the open-space aesthetic on participating properties. The purchase of an easement would reduce the sale value of a property, which could result in a minor reduction in tax

revenues if the land was being taxed on its market, rather than agricultural, value. However, such reduction in revenue is likely to be more than offset by a reduction in local government costs associated with providing services to lands converted to residential development.

The establishment of a Sangre de Cristo Conservation Area will not impact how other state and federal agencies manage their lands or how they allot permits for things such as grazing on public lands. The purchase of an easement would not affect the rights of third parties to exercise their preexisting legal rights on that property (e.g. third-party mineral owners and those descendants of settlers of former Spanish land grants who have been awarded certain traditional use rights on lands in the conservation area)

Unless explicitly stated in the easement due to the requirement of a participating land owner, the Sangre de Cristo Conservation Area will not necessarily preclude the development of certain energy infrastructure. The proposed development would be subject to a compatibility determination by the refuge manager. If it were found compatible, the Service would work with the landowner and developer to minimize the negative environmental effects of the proposed development.

Conservation easements purchased on private land would not change the landowners' rights to manage public access to their properties. Private landowners would retain full control over their property access rights, including allowing or restricting recreational access.

#### Decision and Finding of No Significant Impact

The analysis indicates that there will not be a significant impact<sup>1</sup>, individually or cumulatively, on the quality of the human environment<sup>2</sup> as a result of this proposed action. I agree with this conclusion and therefore find that an EIS need not be prepared. This determination is based on the following factors.

1. Environmental consequences will be beneficial to wildlife habitat, migratory bird populations, and water quality. Based upon informal intra-Service section 7 consultation, the proposed action will not result in the jeopardy of any federally threatened or endangered species, or adversely modify existing designated critical habitat. The proposed conservation area may permanently protect tens of thousands of acres of habitat for Endangered Species Act listed and candidate species.

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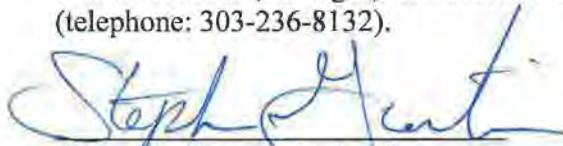
<sup>1</sup> 40 CFR § 1508.27 "Significantly" as used in NEPA requires considerations of both context and intensity (a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world *as a whole*. Both short- and long-term effects are relevant; and (b) Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

<sup>2</sup> 40 CFR § 1508.14 "Human environment" shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment. (See the definition of "effects" (40 CFR § 1508.8).) This means that economic or social effects are not intended by themselves to require preparation of an environmental impact statement. When an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment.

2. The proposed action would pose no known risk to public health and safety.
3. The effects on the quality of the human environment are not highly controversial. There is the potential for some restriction in the potential siting for energy infrastructure, but there is unlikely to be substantial conflict over this land use issue because the Sangre de Cristo Conservation Area easement program is a voluntary initiative with willing sellers only.
4. The proposed easements will not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor would they likely cause any loss or destruction of significant scientific, cultural, or historical resources.
5. No significant cumulative effects were identified through this assessment. The EA discussed the cumulative effects on and off the refuge with those actions proposed by others.
6. The proposed action will be in compliance with all federal, state, and local laws.

Therefore, in light of the compelling science in support of the project, and my review of the information contained in the supporting reference, I have determined that authorizing the Sangre de Cristo Conservation Area is not a major federal action that would significantly affect the quality of the human environment within the meaning of Section 102(2)(C) of NEPA.

The Finding of No Significant Impact (FONSI) and supporting NEPA analysis will be available to the public upon request. Copies of the EA are available for all affected landowners, agencies, private groups, and other interested parties. These documents are on file at the U.S. Fish and Wildlife Service, Refuges, Division of Planning, P.O. Box 25486-DFC, Denver, Colorado 80225 (telephone: 303-236-8132).



Regional Director, Region 6  
U.S. Fish and Wildlife Service



Date

**Supporting Reference**

U.S. Fish and Wildlife Service. 2012. *Sangre de Cristo Conservation Area - Land Protection Plan and Environmental Assessment*, Denver, Colorado.

# Appendix F

## *Environmental Action Statement*

**U.S. Department of the Interior  
FISH AND WILDLIFE SERVICE  
Region 6, Denver, Colorado**

### ENVIRONMENTAL ACTION STATEMENT

Within the spirit and intent of the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (NEPA) and other statutes, orders, and policies that protect fish and wildlife resources, I have established the following administrative record and have determined that the action to establish the Sangre de Cristo Conservation Area and associated easement program:

- is a categorical exclusion as provided by 516 DM 2, Appendices 1 and 2, and 516 DM 6, Appendix 1. No further documentation will be made.
- is found not to have significant environmental effects as determined by the attached Finding of No Significant Impact and Environmental Assessment.
- is found to have special environmental conditions as described in the attached environmental assessment. The attached Finding of No Significant Impact will not be final nor any actions taken pending a 30-day period for public review [40CFR 1501.4(e)(2)].
- is found to have significant effects and, therefore, a notice of intent will be published in the *Federal Register* to prepare an environmental impact statement before the project is considered further.
- is denied because of environmental damage, Service policy, or mandate.
- is an emergency situation. Only those actions necessary to control the immediate impacts of the emergency will be taken. Other related actions remain subject to NEPA review.

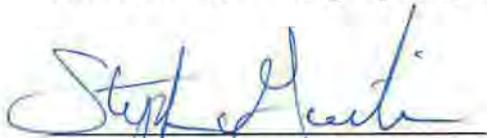
Other supporting document:

U.S. Fish and Wildlife Service. 2012. *Sangre de Cristo Conservation Area - Land Protection Plan and Environmental Assessment*, Denver, Colorado.



Assistant Regional Director  
National Wildlife Refuge System, Region 6

7/30/2012  
Date



Regional Director, Region 6  
U.S. Fish and Wildlife Service

8/1/2012  
Date



# Appendix G

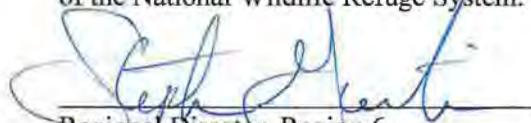
## *Environmental Compliance Certificate*

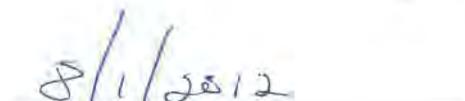
### U.S. FISH AND WILDLIFE SERVICE, REGION 6 ENVIRONMENTAL COMPLIANCE CERTIFICATE

PROJECT: **Sangre de Cristo Conservation Area**  
STATE: **Colorado and New Mexico**

ACTION (indicate if not applicable)	DATE
NEPA (NATIONAL ENVIRONMENTAL POLICY ACT) (INDICATE ONE)	
Categorical Exclusion .....	N/A
Environmental Assessment/Finding of No Significant Impact.....	8/01/2012
Environmental Impact Statement/Record of Decision.....	N/A
Executive Order 11593, Protection of Historical, Archaeological, and Scientific Properties .....	8/01/2012
Executive Order 11988, Floodplain Management.....	8/01/2012
Executive Order 11990, Protection of Wetlands .....	8/01/2012
Executive Order 12372, Intergovernmental Review of Federal Programs.....	8/01/2012
Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations .....	8/01/2012
Executive Order 12996, Management and General Public Use of the National Wildlife Refuge System .....	8/01/2012
Endangered Species Act, Section 7 .....	6/28/2012
Coastal Zone Management Act, Section 307 .....	N/A
Uniform Relocation Assistance and Real Property Acquisition Policies Act .....	Various
Level I Contaminants and Hazardous Waste (Secretarial Order 3127: 602DM2).....	Various

I hereby certify that all requirements of the law, rules, and Service regulations or policies applicable to planning for the above project have met with compliance. I approve the establishment of the Sangre de Cristo Conservation Area to be administered and managed as part of the National Wildlife Refuge System.

  
Regional Director, Region 6  
U.S. Fish and Wildlife Service

  
Date

## STATEMENT OF COMPLIANCE

The following Executive Orders and legislative acts have been reviewed as they apply to the establishment of the Sangre de Cristo Conservation Area:

- 1. Executive Order 11593. Protection of Historical, Archaeological, and Scientific Properties.** Per the regional archaeologist, the creation of this document constitutes an Undertaking as defined by the National Historic Preservation Act (NHPA: 36CFR 800.16(y)). It is an undertaking that has no potential to cause effects on historic properties and therefore there are no further review obligations under NHPA. If, in the future, there are undertakings planned that would potentially cause adverse effects on historic properties, including ground disturbance or alterations to buildings or structures over 50 years of age, those projects should be reviewed under Section 106 of NHPA prior to the start of the project.
- 2. Executive Order 11988. Floodplain Management.** No structures that could be damaged by or that would significantly influence the movement of floodwater are planned for construction by the Fish and Wildlife Service on land acquired as part of this project.
- 3. Executive Order 11990. Protection of Wetlands.** Conveyance of the lands and interests herein shall not exempt such lands and interests from all federal, state, and local laws and regulations as applicable thereto by virtue of their characteristics as wetlands, subject to Executive Order 11990 (May 24, 1990).
- 4. Executive Order 12372. Intergovernmental Review.** The Service has discussed or offered to discuss the proposal to establish the Sangre de Cristo Conservation Area with landowners; conservation organizations; state, federal, and county agencies; tribes; and other interested groups and individuals.

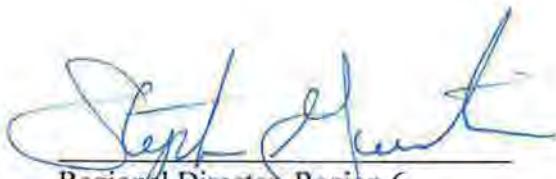
At the federal level, the Service staff has coordinated with the U.S. Forest Service, the Bureau of Land Management, the National Park Service, and the Natural Resource Conservation Service, as well as the congressional delegations for the affected region. At the State level, the service has worked with the Colorado Water Conservation Board and Colorado Parks and Wildlife. The Service has consulted representatives from local governments, including Costilla County, Colorado and Taos County, New Mexico. In addition, the Service has provided information to seventeen Tribes with potential interest in this project.

- 5. Executive Order 12898. Federal Actions to Address Environmental Justice in Minority and Low-Income Populations.** Establishing the Sangre de Cristo Conservation Area will not have a disproportionately high or adverse human health or environmental effect on minority or low-income populations. Therefore, this action complies with this Executive Order.
- 6. Executive Order 12996. Management and General Public Use of the National Wildlife Refuge System.** The public has been invited to participate in the planning process and has

been very engaged. The Service held three public scoping meetings and three public comment meetings, and released the draft environmental assessment and land protection plan for 30 days to get input on the project. The Service received 4 written public comments on the draft EA. Comments and issues raised by the public have been incorporated into the Environmental Assessment and a copy of the final document will be sent to all interested landowners, agencies, private groups, and other parties. While the Sangre de Cristo Conservation Area will be, by definition, a unit of the National Wildlife Refuges System, the project only involves easement acquisition, so the Service will not manage or have control over public access to private lands. This right will remain with the private landowner and, therefore, a compatibility determination is not needed for this project.

7. **Endangered Species Act, section 7.** An informal intra-Service section 7 consultation with the Ecological Services field offices in Colorado and New Mexico concluded with their concurrence that the establishment of the Sangre de Cristo Conservation Area may affect, but is not likely to adversely affect, ESA-protected species.
8. **Coastal Zone Management Act.** Due to the location of the project area, compliance of this Act was determined not to be needed.
9. **Uniform Relocation Assistance and Real Property Acquisition Policies Act.** Since the Service is not seeking to acquire any land within the project area in fee title, no relocation assistance will be needed. The relevant portions of the Uniform Act relating to tax reimbursements, etc. will be implemented on a case-by-case basis as appropriate.
10. **Secretarial Order 3127. Contaminants and Hazardous Waste.** A Level 1 pre-acquisition contaminant survey will be completed before the purchase of any easement.

I hereby certify that the Service has complied with all requirements of law, rules, or regulations applicable to pre-acquisition planning for the above project. I approve the establishment of an acquisition boundary for the Sangre de Cristo Conservation Area and the subsequent acquisition of up to 250,000 acres of easements from willing sellers.



Regional Director, Region 6  
U.S. Fish and Wildlife Service

8/1/2012  
Date



# Appendix H

## *Director's Approval*



In Reply Refer To:  
FWS/ANRS/R6/052366

## United States Department of the Interior

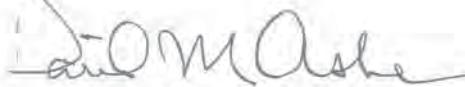
FISH AND WILDLIFE SERVICE  
Washington, D.C. 20240



AUG 23 2012

### Memorandum

To: Regional Director, Region 6

From: Director 

Subject: Approval to Proceed with Publication and Distribution of the Final Planning Documents for the Authorization of the Sangre de Cristo Conservation Area, Colorado and New Mexico.

I approve your request dated August 1, 2012, to authorize the acquisition boundary of the Sangre de Cristo Conservation Area, Colorado and New Mexico.

The Decision Package you submitted for my consideration demonstrates the application of Strategic Habitat Conservation and uses spatially explicit decision support tools for targeting conservation delivery. It also contains an Environmental Assessment, Finding of No Significant Impact, and other related documents indicative of detailed planning. These documents comply with the requirements of the Director's land acquisition planning procedures memo dated August 11, 2000.

The lands targeted for protection will conserve up to 250,000 acres of habitat, within a larger 1,000,000 acre area, for four candidate and listed threatened and endangered species, 300 species of birds, buffer against the adverse impacts associated with a variety of environmental stressors, and ensure progress in achieving the mission of the National Wildlife Refuge System.

Attachments



# Appendix I

## Section 7 Biological Evaluation

### Intra-Service Section 7 Biological Evaluation Form - Region 6

Originating Person: Mike Blenden

Date Submitted: 19March2012

Telephone Number: 303-289-0350

I. **Service Program and Geographic Area or Station Name:**

San Luis Valley NWR Complex

II. **Flexible Funding Program** (e.g. Joint Venture, etc) if applicable:

N/A

III. **Location:** Location of the project including County, State and TSR (township, section & range):

**Saguache, Alamosa, Rio Grande, Mineral, Hinsdale, Conejos, and Costilla Counties, CO; and Rio Arriba and Taos Counties, NM**

The San Luis Valley Conservation Area (SLVCA) is a new, proposed unit of the National Wildlife Refuge System which encompasses the headwaters HUC6 of the Rio Grande River in south-central Colorado and northern New Mexico. It is comprised of the San Luis Valley and the slopes of the Sangre de Cristo and San Juan Mountains which border the valley. The elevation of the SLVCA extends from approximately 7500' on the valley floor to 14,345' at Blanca Peak. Please see attached map.

IV. **Species/Critical Habitat:** List federally endangered, threatened, proposed, and candidate species or designated or proposed critical habitat that may occur within the action area.

Mexican spotted owl (*Strix occidentalis lucida*) (Threatened)

Southwestern willow flycatcher (*Empidonax traillii extimus*) (Endangered; proposed critical habitat present)

Yellow-billed cuckoo (*Coccyzus americanus*) (Candidate)

Gunnison sage-grouse (*Centrocercus minimus*) (Candidate)

Rio Grande cutthroat trout (*Oncorhynchus clarki virginalis*) (Candidate)

Canada lynx (*Lynx canadensis*) (Threatened)

Gunnison's prairie dog (*Cynomys gunnisoni*) (Candidate)

New Mexico meadow jumping mouse (*Zapus hudsonius luteus*) (Candidate; presence in project area uncertain)

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

The Service proposes to establish the SLVCA, a new, 5.2 million acre unit of the San Luis Valley NWR Complex. Within the proposed acquisition boundary of the SLVCA, the Service will seek to acquire an interest in up to 430,000 acres. Acquisition will primarily be in the form of conservation easements which will restrict subdivision, development, and sale of surface water rights; however, the acquisition of up to 30,000 acres in fee-title was approved in the preliminary project proposal, and this tool would be used judiciously as appropriate. Any lands acquired in fee would be managed in accordance with the Comprehensive Conservation Plan for the existing 3 refuges in the complex.

The San Luis Valley is a high desert basin which forms the headwaters of the Rio Grande River. Much of the valley is irrigated for agriculture. Most of the natural vegetation on the valley floor is semi-desert shrubland. However, the precipitation captured in the surrounding valley contributes to a network of surface and groundwater-driven wetlands and riparian corridors which provide breeding and migration stopover habitat for dozens of species of migratory birds. At higher elevations, the habitat transitions to sagebrush scrub, pinon juniper woodland, montane forests, and finally alpine vegetation.

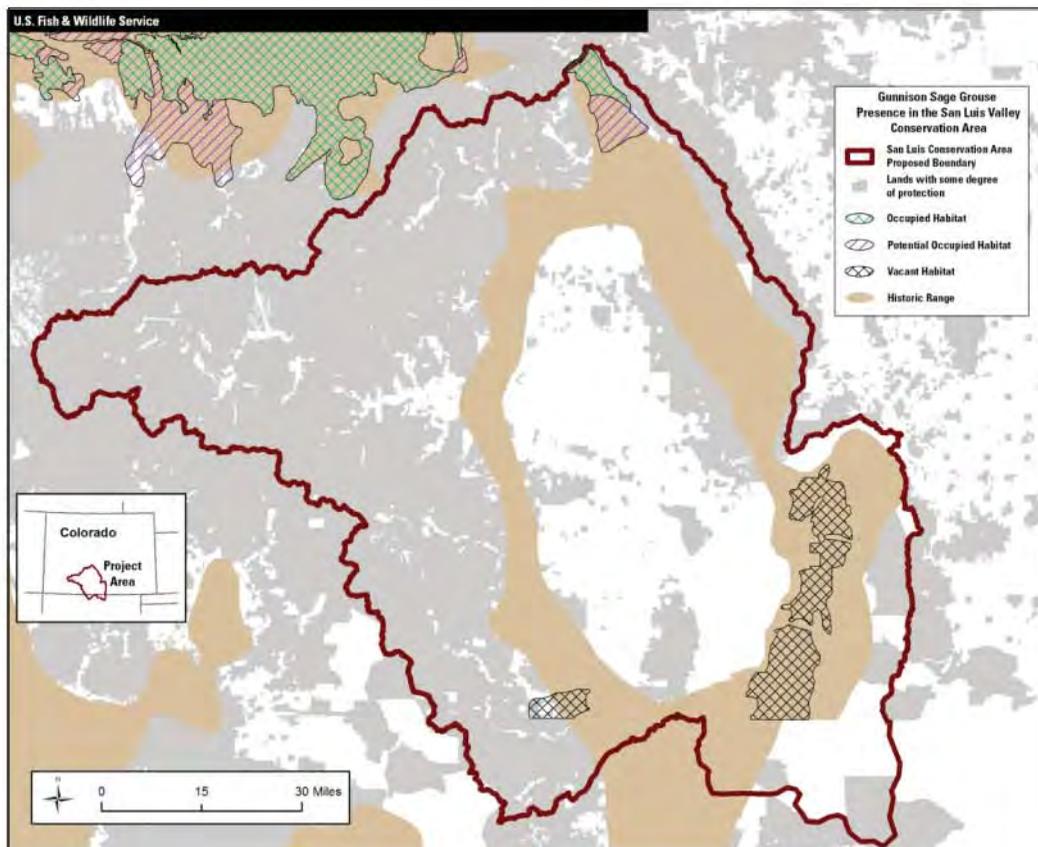
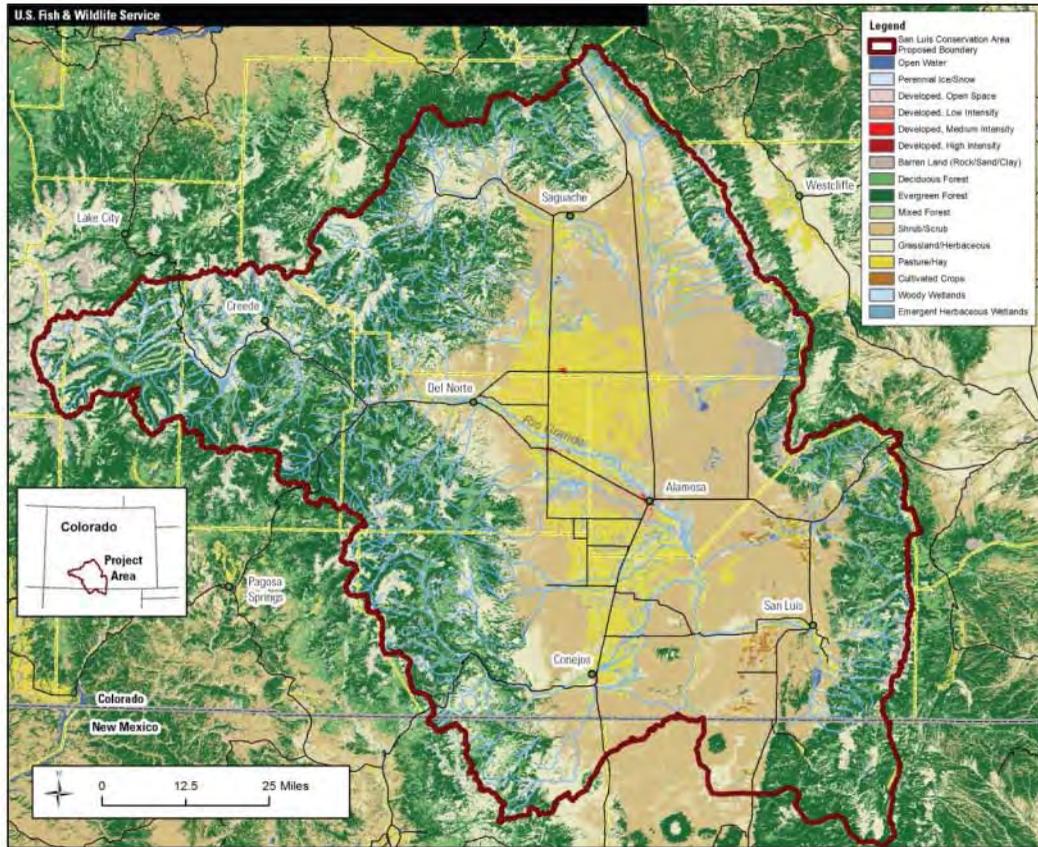
Acquisition within the SLVCA boundary has been prioritized based upon the needs of 8 focal species: southwestern willow flycatcher, Lewis' woodpecker, Rio Grande cutthroat trout, sage thrasher, Gunnison sage grouse, Canada lynx, Wilson's phalarope, and American bittern.

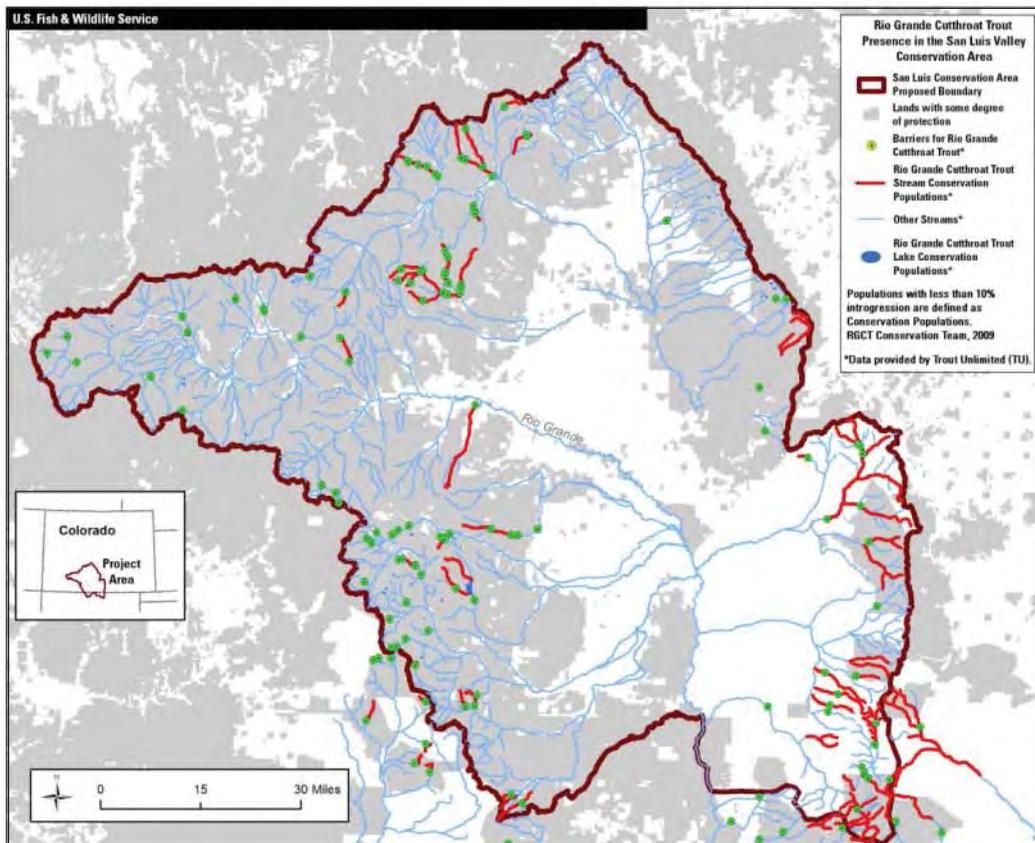
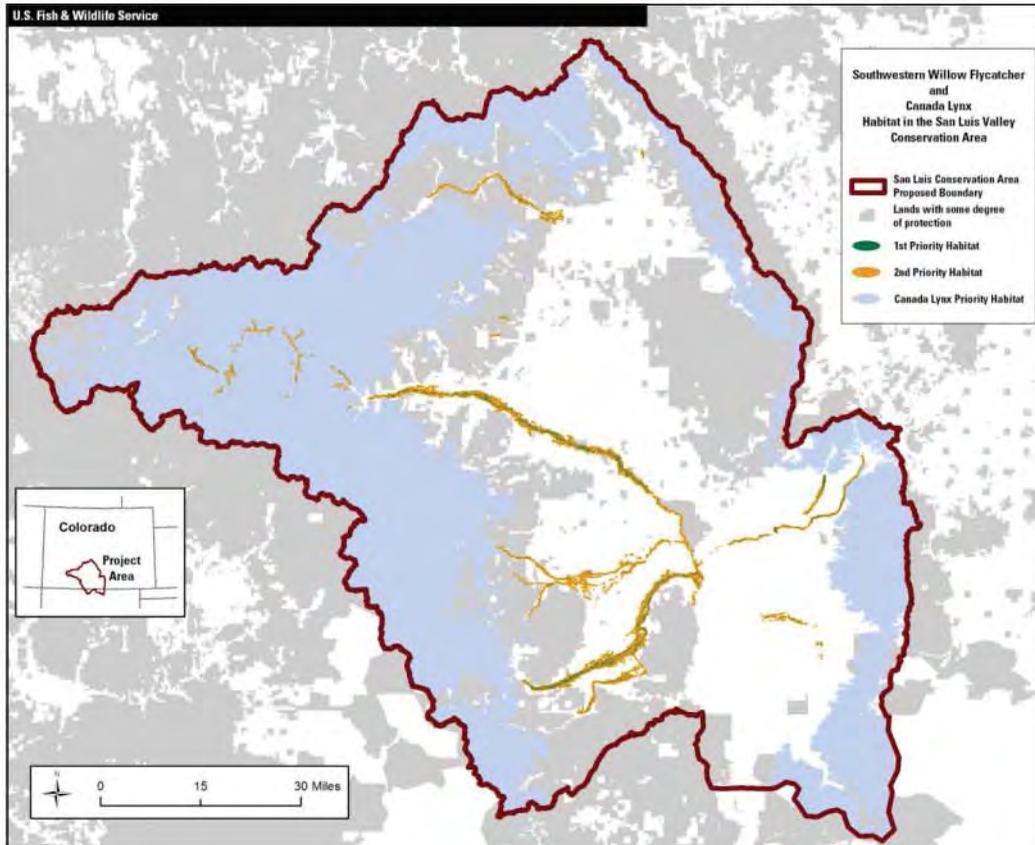
#### VI. **Determination of Effects:**

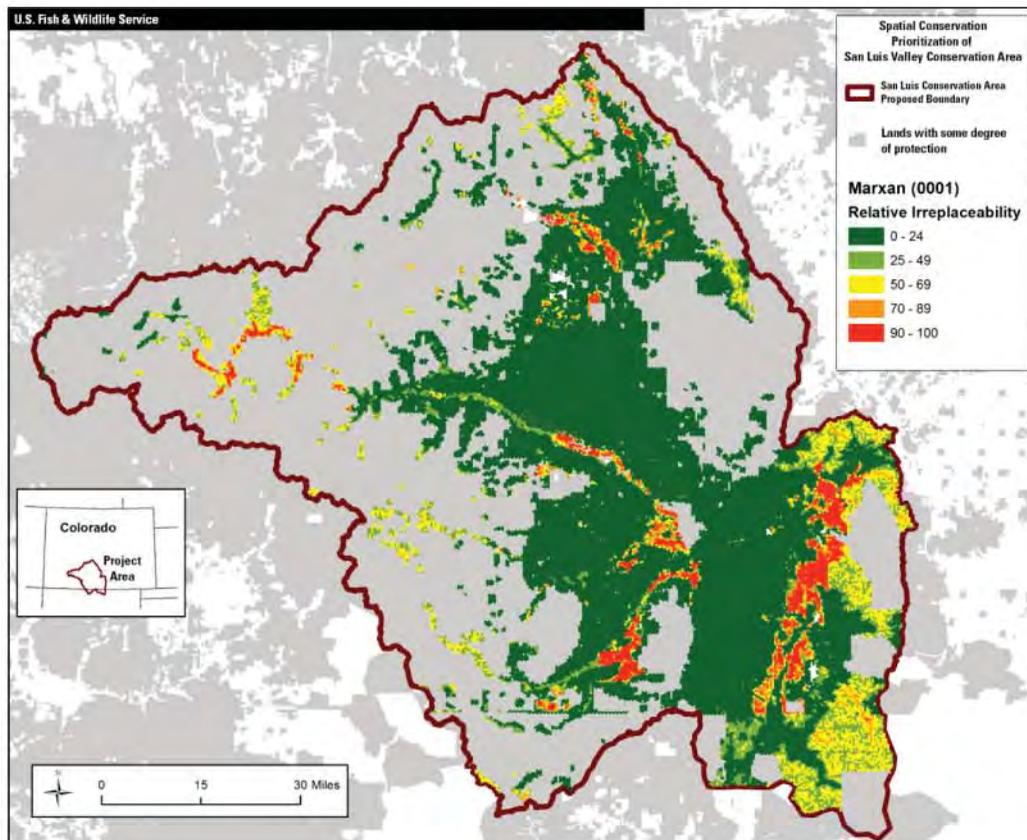
**(A) Description of Effects:** Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

We anticipate the effects of our proposed action to be entirely beneficial to ESA listed and candidate species. In the spatial conservation prioritization for the project, the highest weights were granted to protection of lands in a 200m buffer around southwestern willow flycatcher and yellow-billed cuckoo habitat, as identified by mapping for the draft SLV HCP; and to protection of a 100m buffer around designated conservation populations of Rio Grande cutthroat trout. Included in the Marxan model for spatial conservation prioritization were the occupied, vacant, and potential habitat for Gunnison sage-grouse identified in the GUSG Rangewide Conservation Plan, which may allow for future expansion of the Poncha Pass population and potential reintroduction elsewhere in the valley. Also included was the Canada lynx habitat identified by Colorado Parks and Wildlife (and extended into New Mexico using the land cover classes which comprise most of that habitat). The conservation area includes the montane forests of Costilla County, of which much is currently unprotected. Bringing them into the conservation estate will ensure that this area, identified as an important movement corridor (Leslie Ellwood, CO ES Field Office, pers. comm. with Mike Dixon), will remain largely undeveloped and unfragmented. Please see attached maps.

No explicit population goals are associated with the conservation prioritization strategy at present. However, we expect that the permanent protection of these habitats will allow these imperiled species to maintain their existing populations and/or provide opportunities for future growth.







**(B) Determination:** Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination.

**Determination**

*No Effect:* This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from ESFO required.**

\_\_\_\_\_

*May Affect but Not Likely to Adversely Affect:* This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from ESFO required.**

\_\_\_\_\_ X

*May Affect and Likely to Adversely Affect:* This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with ESFO required.**

\_\_\_\_\_

*May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat:* This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from ESFO optional.**

\_\_\_\_\_

*Likely to Jeopardize candidate or proposed species/critical habitat:* This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conferencing with ESFO required.**

\_\_\_\_\_

Signature Michael J. Blenden  
[Supervisor at originating station]

Date 3/14/2012

**Reviewing Ecological Services Office Evaluation** (check all that apply):

A. **Concurrence**  **Nonconcurrence**   
Explanation for nonconcurrence: \_\_\_\_\_

B. Formal consultation required   
List species or critical habitat unit \_\_\_\_\_

C. Conference required   
List species or critical habitat unit \_\_\_\_\_

Name of Reviewing ES Office Susan C. Linner  
(Colorado)

Signature

*Susan C. Linner*

Date 6/28/2012

Name of Reviewing ES Office \_\_\_\_\_  
(New Mexico)

Signature

\_\_\_\_\_

Date

\_\_\_\_\_

**Reviewing Ecological Services Office Evaluation** (check all that apply):

A **Concurrence**  **Nonconcurrence**   
Explanation for nonconcurrence \_\_\_\_\_

B Formal consultation required   
List species or critical habitat unit \_\_\_\_\_

C. Conference required   
List species or critical habitat unit \_\_\_\_\_

Name of Reviewing ES Office \_\_\_\_\_  
(Colorado)

Signature \_\_\_\_\_

Date \_\_\_\_\_

Name of Reviewing ES Office George D. Dennis  
(New Mexico) Consultation Number 02ENNM00-2012-I-0057

Signature \_\_\_\_\_

George D. Dennis JR

5/10/2012  
Date

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# Glossary

**adaptive strategy**—The ability of an ecosystem to keep ecological function while adjusting to long-term changes in the environment, or shifting to a new normal (such as climate change, established invasive species).

**anthropogenic**—Caused by human activity.

**candidate species**—A species of plant or animal for which the USFWS has sufficient information on its biological status and threats to propose it for listing as endangered or threatened under the Endangered Species Act, but for which development of a proposed listing regulation is precluded by other higher priority listing activities.

**CFR**—See Code of Federal Regulations.

**Code of Federal Regulations (CFR)**—Codification of the general and permanent rules published in the Federal Register by the Executive departments and agencies of the Federal Government. Each volume of the CFR is updated once each calendar year.

**comprehensive conservation plan**—A 15-year plan providing overall management guidance to a unit or complex of the National Wildlife Refuge System.

**conservation easement**—A legally enforceable encumbrance or transfer of property rights to a government agency or land trust for the purposes of conservation. Rights transferred could include discretion to subdivide or develop land, to change current land use practices, to sever water rights, or others as proper, and are specified by contract between the landowner and the conservation entity.

**ecological resilience**—The ability of an ecosystem to rebound from short-term changes to a landscape (such as wildfires, floods, pest outbreaks).

**endangered species**—A species of plant or animal that is in danger of extinction throughout all or a substantial part of its range.

**Endangered Species Act**—A United States law passed by Congress in 1973 with the purpose of protecting and recovering imperiled species and the ecosystems on which they depend.

**environmental assessment**—A National Environmental Policy Act (NEPA) compliance document that analyzes whether to prepare an environmental impact statement or a finding of no significant impact, facilitates compliance when no EIS is necessary, or facilitates preparation of an EIS when one is necessary.

**focal species**—Species that represent a group of species vulnerable to similar threats.

**HUC**—Hydrologic Unit Code, a hierarchical system created by USGS to find locations and regions by hydrology.

**land protection plan**—A document required by USFWS policy before the establishment of new units of the National Wildlife Refuge System, or major expansions of existing units.

**landscape conservation cooperative**—A public-private partnership intended to facilitate cross-political boundary conservation in the face of a changing environment through application of science.

**Marxan**—A software package used as a decision support tool for spatial conservation prioritization.

**Region 6**—An administrative unit of the Service known as the Mountain–Prairie Region, which covers eight States: Colorado, Kansas, Montana, Nebraska, North Dakota, South Dakota, Utah, and Wyoming.

**Service**—U.S. Fish and Wildlife Service.

**strategic habitat conservation**—An iterative adaptive management framework designed to make sure that decisionmaking and management within the Service is science-based. Consists of four stages: biological planning, conservation design, delivery of conservation action, and monitoring and research.

**threatened species**—A species of plant or animal that is likely to become endangered in the future.

**trust species**—Species for which the Federal Government has statutory responsibility, including threatened and endangered species, migratory birds, marine mammals, and interjurisdictional fish.

**U.S.C.**—United States Code.

