



Editor
High Country News
119 Grand Avenue/PO Box 1090
Paonia, CO 81428

Dear Editor:

I am writing you this letter on behalf of the Colorado Native Plant Society to vehemently oppose the "Over the River" project, the proposal by the Artists, Christo and Jeanne-Claude, to install a temporary work of art consisting of fabric panels suspended horizontally over approximately 5.9 miles of the Arkansas River near Salida.

In the area to be impacted by this project, the Colorado Natural Heritage Program in their report to the BLM listed four areas as having significant "biological significance" (descriptions from the CNHP web page):

- County Line: "This site supports a good (B-ranked) occurrence of the globally imperiled (G2/S2) Arkansas Canyon stickleaf (*Nuttallia densa*) and an excellent to good (AB-ranked) occurrence of the globally vulnerable Fendler's Cloakfern (*Argyrochosma fendleri*)".
- Badger Creek Tunnel: "This site includes an excellent to good (AB-ranked) and a fair (C-ranked) occurrence of the globally imperiled (G2/S2) Arkansas Canyon stickleaf (*Nuttallia* [= *Mentzelia*] *densa*). Arkansas Canyon stickleaf is a Colorado endemic restricted to the Arkansas River drainage".
- McIntyre Hills: "This site is drawn for several globally rare plant species, some of which are endemic to the Arkansas River Valley in Colorado. There is a good (B-ranked) occurrence and a fair (C-ranked) occurrence of the globally imperiled (G2/S2) Arkansas Canyon stickleaf (*Nuttallia* [= *Mentzelia*] *densa*), a fair (C-ranked) occurrence of the globally imperiled (G2/S2) Degener beardtongue (*Penstemon degeneri*), a good (B-ranked) and a good to fair (BC-ranked) occurrence of the globally vulnerable (G3/S3) Fendler cloak-fern (*Argyrochosma fendleri*), and an extant occurrence of the globally vulnerable (G3?/S3?) jeweled blazingstar (*Nuttallia* [= *Mentzelia*] *speciosa*). This area represents the largest known concentration of Arkansas Canyon stickleaf individuals in the world.
- The Vallie Potential Conservation Area (PCA) was designated as having "high biological significance": The site supports a fair (C-ranked) occurrence of the globally imperiled (G2/S2) Arkansas Canyon stickleaf (*Nuttallia* [= *Mentzelia*] *densa*). Arkansas Canyon stickleaf is a Colorado endemic restricted to the Arkansas River drainage.

In fact, the Bureau of Land Management itself has designated most of this area either an Area of Critical Environmental Concern (the Arkansas Canyonlands ACEC) or a Wilderness Study Area (the McIntyre Hills WSA).

The BLM's "Preferred Alternative" would allow the project to be constructed along 5.8 miles of the river in all four of the Natural Heritage Programs' PCAs, impacting these

areas over a period of 2½ years. The project would install 9,100 steel anchors by drilling into rock-fill, bedrock or colluvium deposits, construct and install 2,275 Anchor Transition Frames, string 1,275 cables across the river, and hang 925 fabric segments on the cables.

Each of the anchor sites would be visited at least six times by construction teams:

- To survey the anchor points
- To install the anchors
- To install the anchor transition frames
- To install the cables
- To install the fabric panels
- And finally, to remove the structures at the end of the exhibition period

During the two-year construction period the BLM estimates that 36,000 people will visit the site. During the two-week exhibition period they estimated a visitation rate of 24,500 people per day, and during the two-month deconstruction they estimate another 36,000 visits.

The report describes "high recreational use, such as dispersed camping and cross-country hiking", the creation of "social trails" and picnic areas, creation of a "staging area" in the center of the McIntyre Hills PCA, impacting 71 acres. Along the river they describe increased boating leading to "on-shore riverbank vegetation tramping".

After meticulously describing all of these activities and impacts in excruciating detail over hundreds of pages the BLM cavalierly describes this project as having "minor and short-term" impacts on the habitat, stating that other than the 71 acres impacted by the staging areas, only 5.5 acres will be affected by this program.

411,000 people visiting the site over 2½ years and teams of construction workers (albeit only 4 workers per team) repeatedly visiting 2,275 construction sites with drilling machinery, heavy metal frames, wires and miles of fabric will only marginally affect 5.5 acres plant communities with "very high biological significance!" That is a true leap of faith.

Once the construction is removed, the BLM requires that any damaged area be reclaimed:

"In addition to the anchor sites, numerous footpaths, vehicle paths, pathways, parking areas, and other project or visitor usage areas would be uncompacted" and "soil surfaces would be revegetated consistent with adjacent vegetative cover and with use of BLM-approved seed mixtures using native species.

There is no mention made of where the "BLM-approved seed mixtures" would come from. Best management practices on revegetating ecologically important areas call for collecting seeds from these sites before construction and using those same seeds in the revegetation process. "Approved" seed mixtures, whether from Colorado or more likely, from other states, would introduce exotic genetic material into an area which is supposed to be protected because of its unusual biota.

Regarding the introduction of exotic species and noxious weeds, the BLM acknowledges that this may happen in the staging and construction areas (but not by the 411,000 people visiting the site), dismissing the impacts as being, "minor and short-term". In my experience the introduction of exotic and noxious weeds into an environmentally sensitive area is never "minor and short-term". Eradication of exotic species and

noxious weeds are rarely successful except with diligent efforts over long periods of time. It is clear that no such long-term commitment to mitigating this problem is anticipated.

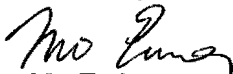
In summary, the BLM has done an exceptional job of outlining in extensive detail the size and scope of this project, and the huge numbers of people it will attract. It is clear, however, that when discussing "natural resources" in this report the main focus is on bighorn sheep as well as some unnamed "avian species" and bats. Unusual plant communities or rare plants are hardly discussed except in table summaries.

One of these tables states that a "biological site monitor" will be available when available when construction teams are working in known rare plant communities. The Colorado Natural Heritage Program designated their Biologically Significant Areas here by surveying a relatively small percentage of the designated sites. Without surveying the whole area to be impacted by this project, it is impossible to know where other populations of these or other possible rare plant communities might be. All we know is that because of an unusual combination of soils, surficial geology, topography, habitat and climate, globally-rare plants are present here. To allow this level of construction and activity in this area is not consistent with a place that even the BLM has designated as an "Area of Critical Environmental Concern."

The BLM has clearly studied this project using a makeshift "cost/benefit" analysis. By essentially denying that there is any "cost" to damaging the local natural and plant communities, and asserting that there are huge financial benefits to the project (without saying how they calculated the financial "benefit" figures that they describe), the BLM has chosen the alternative with the greatest number of linear miles of the river affected. As approval of the project is most likely a foregone conclusion, any one of the alternatives that impact fewer linear miles of river would be preferable to the one supported by the BLM. It is difficult to imagine that a 4.8 mile construct as outlined in Alternative 3 or even better, a 1.4 mile construct as outlined in Alternative 4, would attract fewer viewers, and have a lesser economic benefit than one 5.8 miles long.

The Colorado Native Plant Society urges you to oppose this project in order to protect one of our most beautiful and priceless natural areas in Colorado.

Sincerely,



Mo Ewing
Conservation Chair
Colorado Native Plant Society

moewing@q.com