Appendix A: Comments and Recommendations on
BLM's Grand Junction Field Office Wilderness Characteristics Inventory Update

Range of Alternatives

Although the BLM identified nearly 400,000 acres of potential lands with wilderness characteristics through an initial roadless analysis ("desktop inventory"), the Preferred Alternative would only manage only 3 units for a grand total of 24,400 acres specifically to protect those values. Only one other alternative (Alt C.) would protect any LWC's and it proposes only protecting 12 areas for a total of 171,200 acres (Draft RMP, 2-119). The other two alternatives contain no LWC's areas that would be managed to protect wilderness character.

This approach does not constitute a reasonable range of alternative as directed by NEPA. It also does not demonstrate a meaningful consideration of the value of this important resource in the Grand Junction Field Office, especially evidenced by the scant information pertaining to the benefits that LWC management would have for other resources and values such as wildlife habitat, cultural resources, special status species, primitive recreation opportunities, etc.

Without substantive, comparative environmental impact information regarding other possible courses of action, the ability of an EIS to inform agency deliberation and facilitate public involvement would be greatly degraded. *See Balt. Gas & Elec. Co. v. NRDC,* 462 U.S. 87, 97 (U.S. 1983). While NEPA "does not require agencies to analyze the environmental consequences of alternatives it has in good faith rejected as too remote, speculative, or impractical or ineffective," it does require the development of "information sufficient to permit a reasoned choice of alternatives as far as environmental aspects are concerned." *Colorado Envtl. Coalition v. Dombeck*, 185 F.3d 1162, 1174 (10th Cir. Colo. 1999) (quotations and alteration omitted). CEQ regulations also require agencies to include reasonable alternatives not within jurisdiction of the lead agency. 40 C.F.R. § 1502.14(c).

Unit Boundary Errors

BLM put forth an admirable effort is identifying the general area of most potential LWC units, after on-the-ground inventory's were conducted by conservationists, it was apparent that some boundaries for those units were arbitrarily drawn, contrary to BLM's own policies laid out in revised BLM Manual 6310.

> "The boundary of the wilderness characteristics inventory unit must be established. Where possible, BLM offices should use existing wilderness characteristics inventory units for maintaining the inventory. The boundary is generally based on the presence of wilderness inventory roads (see Appendix C to determine if a route meets the wilderness inventory road definition), and can also be based on property lines between lands in Federal ownership and other ownerships or developed rights of way. Other inventory unit boundaries may occasionally be identified." (BLM Manual 6310, p.5)

In some instances (see Appendix A) boundaries were drawn despite the absence of any qualifying feature whatsoever (i.e. Wilderness Inventory Road, developed right-of-way), drawn on existing routes that do not qualify as boundaries because they are clearly not "maintained using mechanical means to

ensure relatively regular and continuous use" (nor are they developed rights-of-way) and do not meet the criteria for boundary delineation laid out in the BLM Manual.

These boundaries errors resulted in a number of units being drawn smaller than the actual qualifying area, or large units being divided up into smaller ones due to incorrect information. Beyond the fact that this practice does not meet the criteria detailed in BLM Manual 6310, it brings into question the determinations made on individual units. laid out in BLM's own policies for boundary delineation for LWCs, but because when boundaries are misdrawn, the determinations made on whether or not wilderness characteristics exist in the unit are not based on the full suite of characteristics present. E.g. If the determination for incorrectly drawn a unit of 7,000 acres is that it doesn't have outstanding opportunities for solitude, but in fact the qualifying unit is 12,000 acres, then a whole host of wilderness characteristics from that additional 5,000 acres were not considered and the analysis and determination are incorrect.

Data Inconsistency

In addition to the troublesome boundaries errors, there is also an issue with the transparency and overall efficacy of BLM LWC data. Despite the fact that BLM identified 31 LWC units totaling roughly 400,000 acres, the corresponding LWC Inventory update only contains three Route Analysis forms (Appendix A of BLM Manual 6310). In addition, the GJFO Inventory Update contains only 41 photographs for 31 units. How boundary determinations are being made without cataloging evidence of the construction, maintenance and use of boundary routes is quixotic at best. The absence of Route Analysis forms coupled with the lack of photographic evidence of the naturalness, outstanding opportunities for solitude or a primitive and unconfined type of recreation and the boundary delineations themselves brings into question the care to which the LWC inventory was conducted as well as its findings.

To make manner worse, of the few photographs included in the report, a startling number of them are from 2006 and are used to document the lack of naturalness of an area. Needless to say, conditions change over the course of 6 years and the most up to date information should be used when making determinations or supporting determinations. Also, many of the inventory reports themselves are from 2009, pre-dating the revision of BLM LWC policies and BLM Manuals 6310 and 6320.

Outstanding Opportunities

BLM too narrowly construes its own guidance on whether wilderness characteristics exist in the planning area. BLM guidance reads "In order for an area to qualify as lands with wilderness characteristics, it must possess sufficient size, naturalness, and outstanding opportunities for either solitude or primitive and unconfined recreation." (IM 2011-154, p. 5) The guidance highlights the importance of "or" in this section:

> Determine if the area has outstanding opportunities for solitude or a primitive and unconfined type of recreation. The word "or" in this sentence means that an area only has to possess one or the other. The area does not have to possess outstanding opportunities for both elements, nor does it need to have outstanding opportunities on every acre, even when an area is contiguous to lands with identified wilderness characteristics. In most cases, the two opportunities can be expected to go hand-in-hand. An outstanding opportunity for solitude, however, may be present in an area offering only limited primitive recreation potential. Also, an area may be so attractive for primitive recreation that it would be difficult to maintain an opportunity for solitude. (IM 2011-154, p. 6)

Recommendations

BLM should utilize this planning process as an opportunity to update its LWC inventory to fulfill both its obligation under FLPMA but also to be in accordance with BLM Manual 6310 and 6320. This would entail BLM updating the boundaries associated with the units as described in BLM Manual 6310, including evidence of its determinations via Route Analysis forms, updated photos, waypoints and unit descriptions containing supplemental values.

BLM can update this information so that it can make the correct determination regarding size, naturalness, outstanding opportunities for either solitude or primitive and unconfined recreation, aiding the agency in adhering to NEPA by presenting a reasonable range of alternatives.

Comments on Individual Units

Bangs Canyon and Bangs West:

Summary and Boundary Delineation:

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the two adjacent units of Bangs Canyon and Bangs West as areas that could meet the criteria for lands with wilderness characteristics. In the report, the BLM provides inventories for areas of around 6,900 acres at Bangs West and around 20,400 acres at Bangs Canyon. These draft inventories—the Bangs Canyon inventory was completed in 1999 and "validated" in 2009 while the Bangs West inventory was conducted in 2011—concluded that Bangs Canyon met the criteria for a lands with wilderness characteristics but Bangs West did not. The reasons cited for the disqualification of Bangs West included a lack of outstanding opportunities for solitude and a lack of outstanding opportunities for primitive and/or unconfined recreation; the report also failed to find any supplemental values of note in the Bangs West unit.

During May of 2013, The Wilderness Society visited Bangs Canyon and Bangs West to conduct an in-depth, on-the-ground field inventory of the potential LWC units. Our goal was to assess whether the BLM's draft inventory boundaries met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified several adjustments that should be made to the BLM's boundaries for the Bangs and Bangs West units to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map and photosheet). Without identifying the true boundaries of a potential LWC unit, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these adjustments are made can a complete picture of the area's outstanding wilderness characteristics can be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the boundaries BLM has proposed for both Bangs Canyon and the Bangs West units do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All photopoints referred to in the narrative below

can be seen in the attached photosheet for Bangs Canyon/Bangs West. All route names referred to below correspond with the route names as they appear in the Travel Management (TMP) maps provided by the BLM.

The Bangs Canyon and Bangs West units identified by the BLM are actually a single unit. The boundary line between Waypoint 1 and Waypoint 3 on the attached map does not exist on the ground. The BLM seems to confirm this fact in that no route shows up on the BLM's travel management maps which correspond with this boundary segment. The nearby routes of P691 (Waypoint 4) and P118 (Waypoints 5 and 6) are clearly not maintained using mechanical means to ensure regular and continuous use and thus do not meet the criteria for an LWC boundary either. Because that BLM has drawn a boundary to separate the Bangs West and Bangs Canyon units that does not actually exist on the ground, these two units should be combined into one. As a single potential LWC unit instead of two individual ones, the wilderness characteristics of all 27,300 acres should be documented and analyzed together. In this case, the wilderness characteristics that were found by the BLM to exist in Bangs Canyon also exist in Bangs West, because no qualifying boundary feature separates the two.

Additional boundary and route comments:

- The Tabeguache Trail, while motorized, is likely not maintained using mechanical means, particularly south of P211. The trail is touted by OHV users for providing a difficult and unmaintained motorized experience. This is also evidenced by the fact that BLM itself does not label the Tabeguache Trail as a Wilderness Inventory Road in its LWC report (the Tabeguache is used as a boundary between Bangs and Bangs West, but once the Tabeguache turns to the east at P118 (Waypoint 1), the BLM inventoried it as a way, not a WIR, despite the fact that there is no change in condition at this point). There is currently no motorized access to the north end of the Tabeguache Trail where it meets Highway 141. For these reasons the route should be considered a cherrystem to the private lands inholding at Waypoint 18, and an unmaintained "way" beyond that point.

- The area identified in the BLM's draft inventory as the Bangs West unit is bounded on the west and south by several routes that do not meet the criteria for WIRs. These routes, including P242, P342, P325, P19, P571, P285, and P691, P440, and P286 are currently blocked from access by the public as they either originate from, or pass through, private lands atop the mesa. While some of these routes likely see occasional use from the private landowners, they are currently not maintained using mechanical means to ensure relatively regular and continuous use and thus do not meet the criteria for WIRs. (The BLM's preferred alternative would designate all of these routes as administrative use only. If there is an administrative use for these routes, the purpose and need for each route should be explicitly stated, and any routes that are not needed for these purposes should be designated as closed.) Wherever these routes are used as boundary features, that boundary should be deleted and moved to the west where BLM lands meet private land boundaries (Waypoint 24 to 25; Waypoint 26 to 27; Waypoint 7 to 8).

- The eastern boundary of the area identified as the Bangs Canyon unit in the BLM's draft inventory (Waypoint 11 to 12) does not exist on the ground and cannot be used for LWC boundary delineation. This boundary segment should be moved to Highway 141 to the east. Additionally, P440 and P286 are rough two-track routes that see little use and show no signs of mechanical maintenance. These routes should not be used as boundary features and thus the boundary should be moved south to P402 and P291 (Waypoints 9 to 10).

- At the northern boundary of the BLM's draft Bangs Canyon unit, P219 follows an existing fence line along the rim of Bangs Canyon proper. This route is a two-track route that appears to be solely maintained by the passage of vehicle (Waypoints 19 and 20). While this route should remain open to allow access by the leaseholder for the maintenance of the fence, it does not qualify as a WIR and should not be cherrystemmed out of the unit as the BLM does in their draft inventory report.

- P270 (Waypoint 18) is revegetating naturally and is almost entirely invisible on the ground. The route should be closed and rehabbed.

- One must cross East Creek to access P251. The route is currently unmaintained and we support closure of this route to protect the wilderness and other natural resources present in the Bangs Canyon unit to the west.

- The BLM's draft inventory removes a portion of the unit at the terminus of P16 (near Waypoint 13) because of "major livestock developments and access routes to them" (Draft Inventory, p.11). Except for the largest development at Waypoint 13, the associated features in this area are substantially unnoticeable to the casual visitor and do not detract from the wilderness characteristics of the 27,300 acre unit as a whole. The access route P12 should be cherrystemmed from the private lands to the northeast to the development at Waypoint 13; the remaining area should be left within the unit.

Wilderness Characteristics and the BLM's Wilderness Characteristics Determinations:

The BLM's draft inventory found around 20,400 acres of the Bangs Canyon unit to meet the criteria for a Lands with Wilderness Characteristics. At the same time, the BLM determined that the Bangs West unit did not meet those criteria because of a lack of outstanding opportunities for solitude and primitive and/or unconfined recreation. However, as shown above, the Bangs West and Bangs Canyon unit were divided by arbitrary boundaries that do not meet the criteria for boundary delineation features as laid out in BLM Manual 6310. Because of this fact, both of these units should be analyzed as one, and any wilderness characteristics found in one unit exist in the other.

Besides the fact that Bangs West and Bangs are actually a single unit, the area analyzed by the BLM as the Bangs West unit has wilderness characteristics of its own. However, the BLM cites the frequent use of Ladder and Mine canyons as well as the "lack of topographical variety" on the "flat" mesa tops as the rationale for determining that the Bangs West unit does not provide outstanding opportunities for solitude. BLM states that "the best opportunities for solitude [in the unit are found in] Ladder Canyon and Rough Canyon" but then cites the popularity of these canyons as the reason that they do not provide outstanding opportunities for solitude. This ignores the bulk of the Bangs West unit to the south, where outstanding opportunities for solitude are easily found in the many narrow side canyons and the gently sloping pinyon and juniper covered ramps that lead up to the high mesa tops. The BLM's own draft inventory points out that the Tabeguache Trail, which is the only public access to the southern portion of the Bangs West unit, "is used by a relatively small number of mountain bike enthusiasts annually" and although open to motorized vehicles "the recreation use is relatively low" (Draft Inventory, p.9). The difficulty of access in reaching the vast majority of the unit south of Ladder and Rough canyons means that anyone venturing out into these areas can easily find outstanding

opportunities for solitude that may be more difficult to find nearer the trailhead and parking area just off of Little Park Road. In fact, in our visit over two days in May of 2013, we did not encounter a single other visitor south of the southern terminus of the Rough Canyon trail, this despite the fact our visit occurred during the mild weather of mid-Spring, a popular time for outdoor recreation in the Grand Junction area. A two-hour hike up the benches between Cross and Rough Canyons provided an outstanding sense of solitude, and quiet and isolation was easily found.

The draft inventory further points out that "recreation is relatively confined to [Ladder and Rough Canyons]". If this is the case, then opportunities for solitude are plentiful outside of these two canyons, particularly along the finger ridges and sandstone slopes that separate the many canyons draining off of Clarks bench and the mesa to the south, as well as in upper Bangs, West Bangs, and North East Creek canyons, the same canyons that the BLM describes in its draft inventory for the Bangs Canyon unit as "frequently rugged, seldom visited" and that "provide outstanding opportunities for visitors to find a secluded place and isolation" (Draft Inventory, p.11). If these canyons provide outstanding opportunities for solitude and isolation below the lightly traveled Tabeguache Trail, then the certainly do above this route as well.

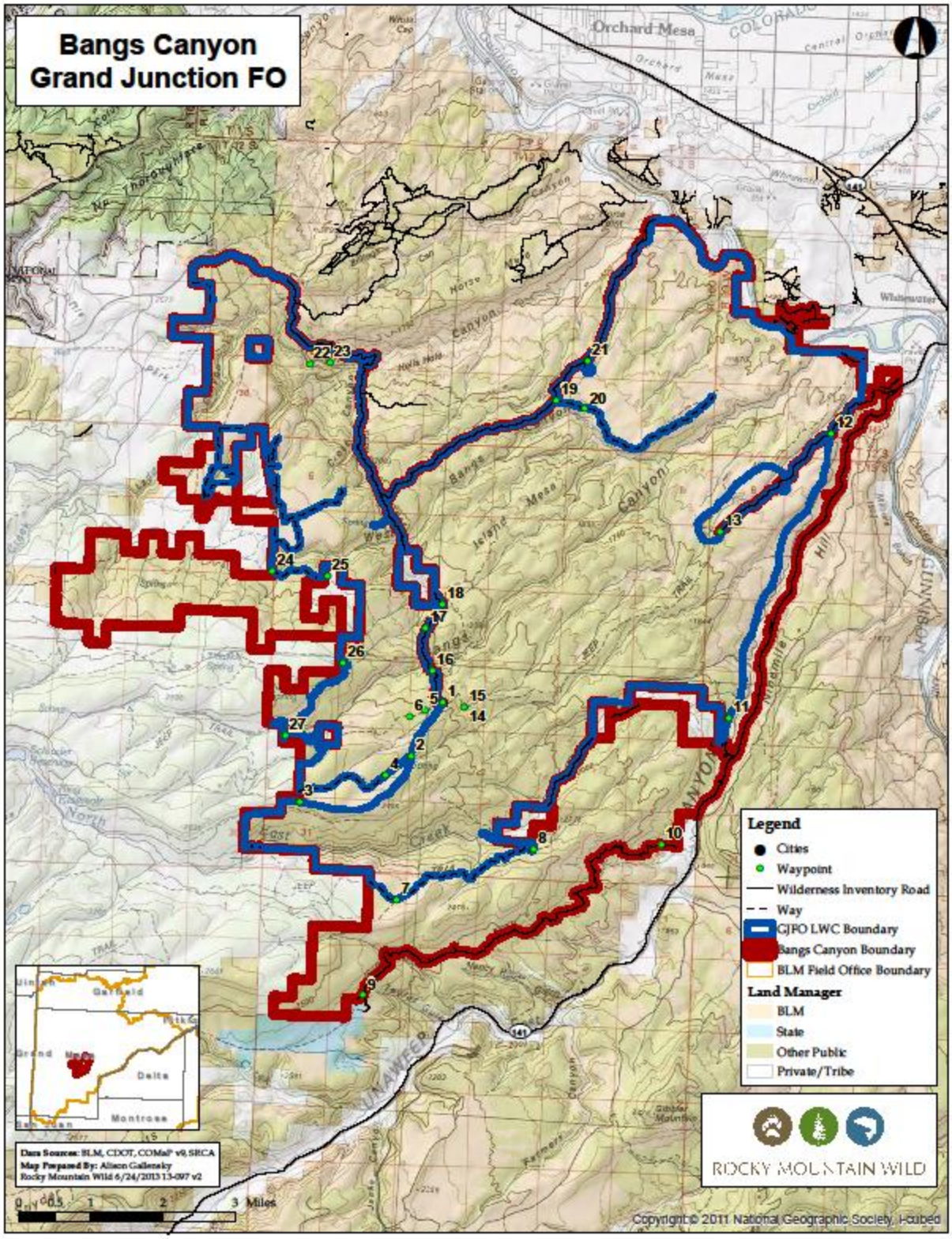
In addition, the statement that the area "lacks topographical variety" lacks evidence and is contrary to what is actually found on a visit to the area. In fact, the area defined by the BLM as the Bangs West unit contains a system of numerous deep side canyons, tilted ramps and sandstone domes, broken talus slopes, and undulating mesa tops. The area has outstanding topographical variety in every portion of the unit; topographical variety that contributes significantly, rather than detracts from, the outstanding opportunities for solitude found in the area.

The BLM's draft inventory of the Bangs Canyon unit found outstanding opportunities for primitive and/or unconfined recreation "in many locations" throughout the unit. The BLM cites the area's overall size, diversity of wildlife, lush riparian habitats, perennial stream flows, and steep-walled slopes as all contributing to the opportunities for primitive and unconfined recreation. Every single one of these features also exists in the Bangs West unit, and the overall size is enhanced when both units are combined as required by the guidance in Manual 6310. The Bangs West unit alone contains outstanding wildlife resources, including elk summer range and production areas as well as important summer and winter range for mule deer. Like the Bangs Canyon unit, Bangs West contains lush riparian habitats and perennial stream flows. And of course the unit contains abundant steep-walled slopes in its many narrow side drainages. Like those found by BLM in Bangs Canyon, Bangs West has all the outstanding features that "contribute to opportunities for recreational activities that require an open, unconfined setting, and which do not demand developed facilities" (Draft Inventory, p. 12). The off-trail hiking, backpacking, photography, camping, bird-watching, and canyoneering opportunities in this portion of the unit are undoubtedly outstanding.

Because the BLM did not find outstanding opportunities for solitude or primitive and/or unconfined recreation in Bangs West, supplemental values for this unit were not described in the inventory. However, as described above, Bangs West and Bangs Canyon are technically the same unit, and thus the supplemental values found in Bangs Canyon, including the outstanding cultural resources, rare plant and botanical resources, wildlife, and geological resources are inherited by the area described as Bangs West as well. This is bolstered by the fact that the Bangs West unit contains the Rough Canyon Area of Critical Environmental Concern (ACEC) which was designated by the BLM to protect the critical endangered plants, scenic values, and cultural resources found throughout the area.

Summary and Recommendation:

The areas identified in the BLM's draft inventory as the Bangs Canyon and Bangs West units are actually adjacent and in several locations are not separated by features which qualify as boundary delineation features according to BLM's own guidance. Bangs Canyon and Bangs West should be inventoried as a single unit and any decisions made on areas within this unit that are determined not to contain wilderness characteristics should be documented with photographs and narrative rationale. The entirety of the combined Bangs Canyon/Bangs West unit is natural, contains outstanding opportunities for solitude and primitive and unconfined recreation, and has numerous supplemental values that contribute to its wilderness characteristics.


Bangs Canyon
Grand Junction FO
Orchard Mesa
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
GJFO LWC Boundary
Bangs Canyon Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/24/2013 13-097 v2
0 0.5 1 2 3 Miles
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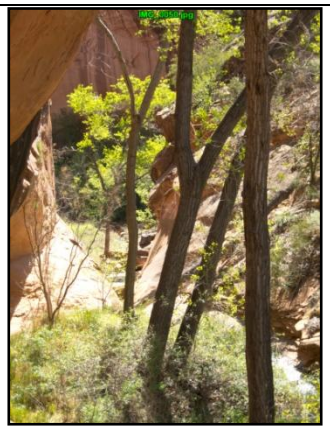
Bangs Canyon and Bangs West
Photopoints

The following photopoints contain location coordinates. Photos that correspond with icons in the attached map or mentioned in the previous narrative or highlighted in bold.

Overview Map

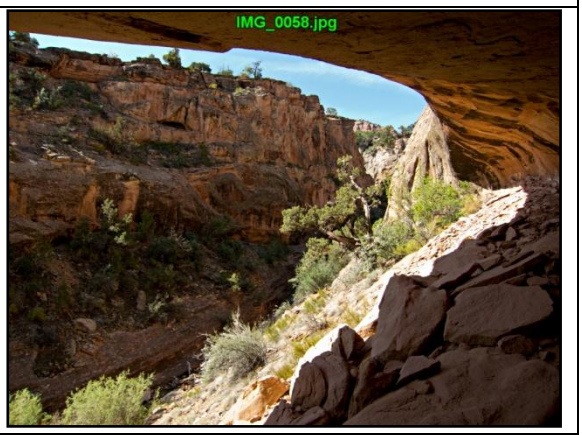
Attributes	
File Name	Narrow canyons in West Bangs unit.
Title	
Subject	Lush and narrow slot canyons in unit near Rough Canyon.
Latitude	
Longitude	
Elevation	
Photo Direction	

Opportunities for solitude.



Attributes	
File Name	IMG_0058.jpg
Title	In side drainage above Rough Canyon.
Subject	Huge alcoves provide outstanding opportunities for solitude.
Latitude	
Longitude	
Elevation	
Photo Direction	West

Opportunities for solitude.



Title:

Attributes

File Name	IMG_0063.jpg
Title	Flowing water in side drainage below Clarks Bench.
Subject	
Latitude	
Longitude	
Elevation	
Photo Direction	West

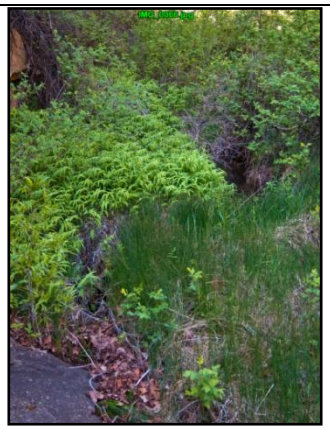
Flowing water allows for extended overnight primitive recreation experiences.

Title:

Attributes

File Name	IMG_0066.jpg
Title	Lush growth in side canyons south of Rough and Ladder canyons.
Subject	
Latitude	
Longitude	
Elevation	
Photo Direction	west

Lush foliage in a side canyon south of Ladder Canyon.



Title:

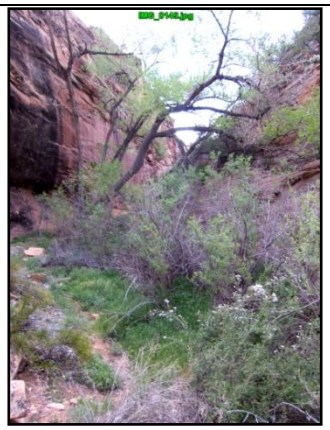
Attributes	
File Name	IMG_0078.jpg
Title	Varied topography.
Subject	Example of the varied topography and screening that provides solitude
Latitude	
Longitude	
Elevation	
Photo Direction	west

Topographical variety.

Title:

Attributes	
File Name	IMG_0149.jpg
Title	Dense foliage.
Subject	Off trail hiking provides outstanding primitive recreation opportunities.
Latitude	
Longitude	
Elevation	
Photo Direction	ENE

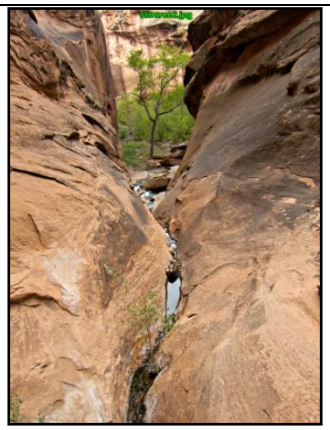
Dense foliage.



Title:

Attributes	
File Name	slimtree2.jpg
Title	Sandstone narrows
Subject	Sandstone canyons provide excellent canyoneering experiences and outstanding primitive recreation.
Latitude	
Longitude	
Elevation	
Photo Direction	

Narrow slots with flowing water make for unique photography.



Title:

Attributes	
File Name	widetree.jpg
Title	Amphitheater.
Subject	A wide sandstone bowl provides unique photography and other primitive recreational opportunities.
Latitude	
Longitude	
Elevation	
Photo Direction	

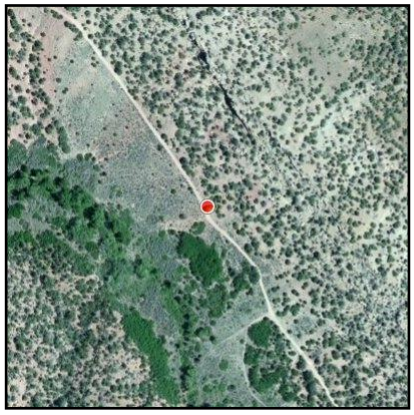
Several large alcoves such as this can be found by those who make the effort.

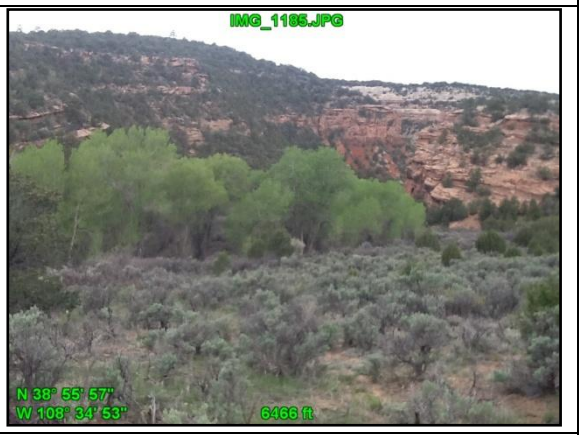
Title:

Attributes

File Name	IMG_1185.JPG
Title	Vegetation.
Subject	Typical wide variety of vegetation types.
Latitude	N 38° 55' 57"
Longitude	W 108° 34' 53"
Elevation	6466 ft
Photo Direction	0° N

Typical variety of vegetation types—sage, cottonwood, and juniper.





Title:

Attributes

File Name	IMG_1187.JPG
Title	Tabeguache trail.
Subject	The Tabeguache Trail is prized for its difficult, but unmaintained, recreation opportunities.
Latitude	N 38° 54' 40"
Longitude	W 108° 34' 38"
Elevation	7009 ft
Photo Direction	17° NNE

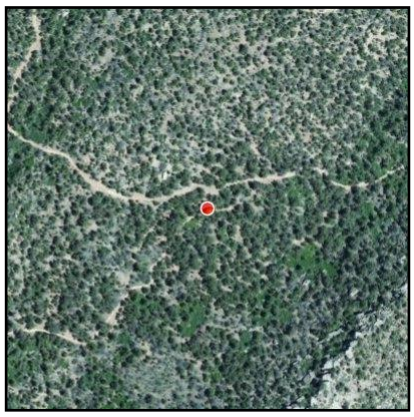
One of the “smoother” sections of the Tabeguache Trail.

Title:

Attributes

File Name	**Waypoint 1**
Title	Looking up P118
Subject	Not constructed, not maintained. Maintained solely by the passage of vehicles
Latitude	N 38° 54' 28"
Longitude	W 108° 34' 32"
Elevation	7310 ft
Photo Direction	WSW

Waypoint 1 - P118 looking WSW. No signs of original construction. User created.



Title:

Attributes

File Name	**Waypoint 5**
Title	Looking up P118
Subject	Not constructed, not maintained. Maintained solely by the passage of vehicles. Too narrow for passenger vehicles. No outlet.
Latitude	N 38° 54' 23"
Longitude	W 108° 34' 46"
Elevation	7358 ft
Photo Direction	West

Waypoint 5 – Looking up P118. Too narrow for passenger vehicles.

Title:

Attributes

File Name	**Waypoint 6**
Title	P118
Subject	Overgrown. Light use. Not maintained. P118 quickly disappears because of a lack of maintenance. Not a WIR.
Latitude	N 38° 54' 19"
Longitude	W 108° 34' 55"
Elevation	7394 ft
Photo Direction	322° NW

Waypoint 6 – Further up P118. Overgrown with fallen timber in roadway.

Title:

Attributes

File Name	**Waypoint 14**
Title	
Subject	
Latitude	N 38° 54' 28"
Longitude	W 108° 34' 13"
Elevation	7115 ft
Photo Direction	SE

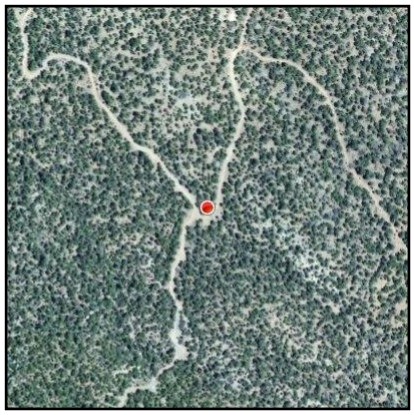
Waypoint 14 – Looking southeast down P275.
Not maintained using mechanical means.

Title:

Attributes

File Name	**Waypoint 18**
Title	Looking NNE up P270
Subject	
Latitude	N 38° 55' 39"
Longitude	W 108° 34' 35"
Elevation	6669 ft
Photo Direction	NNE

Waypoint 18 – N. Looking up P270. No use. Naturally reclaiming itself.



Title:

Attributes

File Name	Route P211
Title	
Subject	
Latitude	N 38° 56' 56"
Longitude	W 108° 35' 34"
Elevation	6516 ft
Photo Direction	East

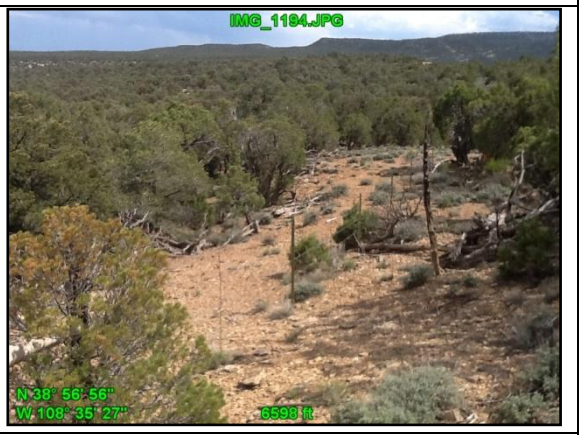
Unmaintained and very rough P211 near junction with Tabeguache Trail.

Title:

Attributes

File Name	IMG_1194.JPG
Title	
Subject	
Latitude	N 38° 56' 56"
Longitude	W 108° 35' 27"
Elevation	6598 ft
Photo Direction	South.

Looking along fence line perpendicular to P211.



Title:

Attributes

File Name	IMG_1195.JPG
Title	
Subject	
Latitude	N 38° 57' 20"
Longitude	W 108° 34' 50"
Elevation	6283 ft
Photo Direction	NE

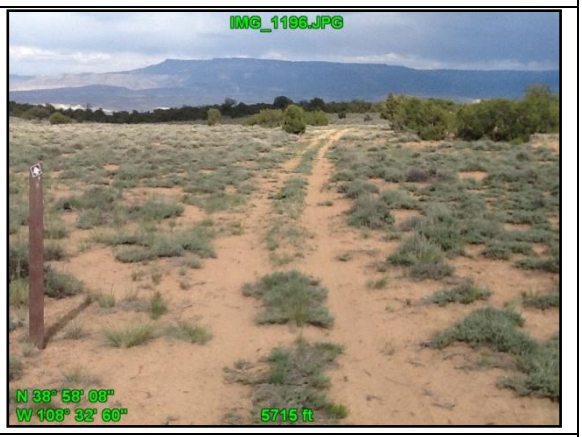
Rough section of P211. No signs of maintenance using mechanical means. May not qualify as WIR despite being used as a boundary by BLM.

Title:

Attributes

File Name	**Waypoint 19**
Title	
Subject	Follows fence line above Bangs Canyon but not a WIR. Leave in unit as a way.
Latitude	N 38° 58' 08"
Longitude	W 108° 32' 60"
Elevation	5715 ft
Photo Direction	East

Waypoint 19 – East. Start of P219 where it meets P211. Two track, not bladed. Maintained solely by the passage of vehicles. Not a WIR.

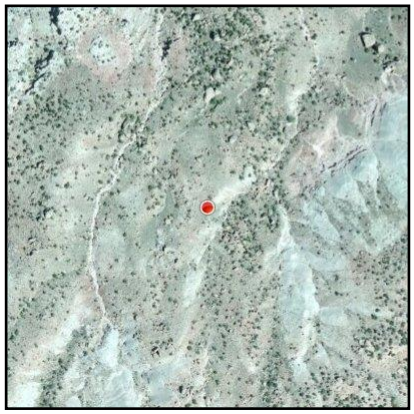


Title:

Attributes

File Name	IMG_0038.jpg
Title	
Subject	
Latitude	N 38° 58' 27"
Longitude	W 108° 34' 41"
Elevation	
Photo Direction	

Example of varied topography and outstanding scrambling and hiking opportunities.

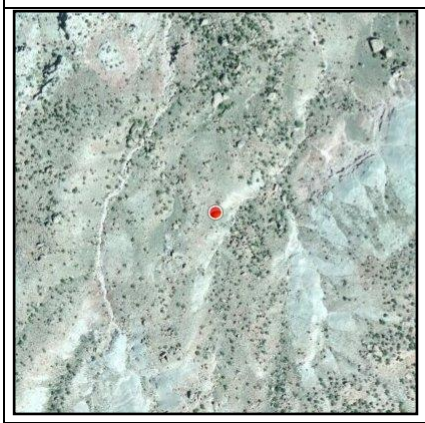


Title:

Attributes

File Name	westbangs1.jpg
Title	
Subject	
Latitude	N 38° 58' 27"
Longitude	W 108° 34' 41"
Elevation	
Photo Direction	

Panoramic view of side canyons coming down off of Clarks Bench. Outstanding solitude can be found in any of these canyons or along the ramps and ridges that separate them from eachother.

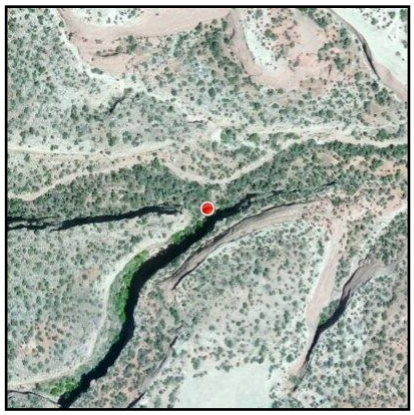


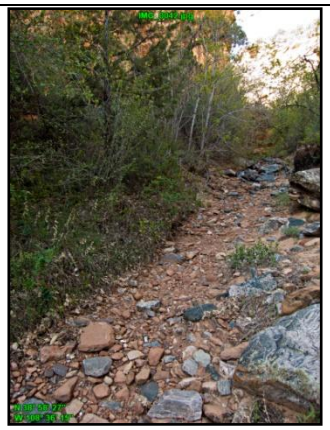
Title:

Attributes

File Name	**Waypoint 23**
Title	
Subject	
Latitude	N 38° 58' 27"
Longitude	W 108° 36' 15"
Elevation	
Photo Direction	

Waypoint 23 – although Rough Canyon trail is popular with hikers, the vegetative screening along the trail is thick enough to provide a sense of solitude.



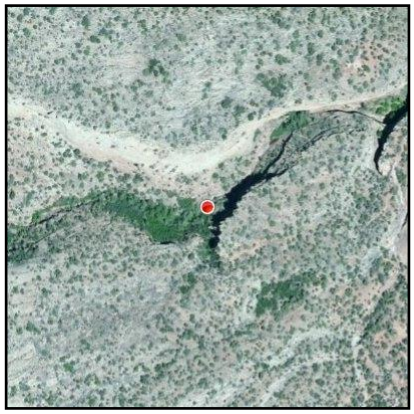


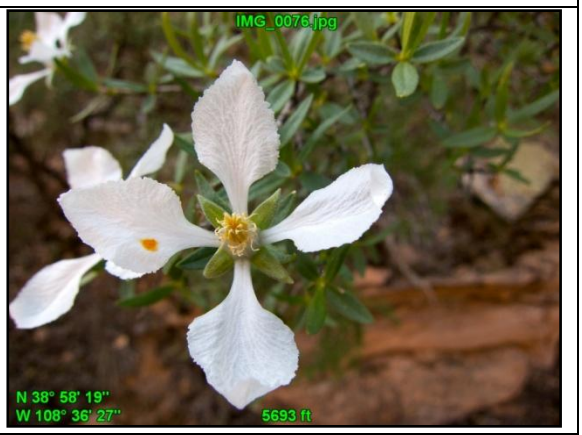
Title:

Attributes

File Name	IMG_0076.jpg
Title	
Subject	
Latitude	N 38° 58' 19"
Longitude	W 108° 36' 27"
Elevation	5693 ft
Photo Direction	

Numerous wildflowers can be found throughout the unit in spring.





Title:

Attributes

File Name	**Waypoint 22**
Title	
Subject	
Latitude	N 38° 58' 21"
Longitude	W 108° 36' 29"
Elevation	5833 ft
Photo Direction	

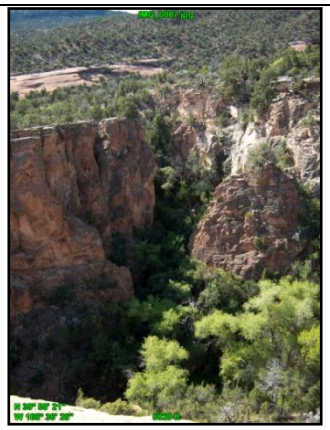
Waypoint 22 – West.
Narrow slot canyons, convoluted ridges, and steep escarpments provide outstanding recreation opportunities.

Title:

Attributes

File Name	IMG_0087.jpg
Title	
Subject	
Latitude	N 38° 58' 21"
Longitude	W 108° 36' 29"
Elevation	5829 ft
Photo Direction	

Narrow slot canyons are rarely explored.



Title:

Attributes

File Name	IMG_0088.jpg
Title	
Subject	
Latitude	N 38° 58' 21"
Longitude	W 108° 36' 29"
Elevation	5827 ft
Photo Direction	

Unique geology is found throughout the unit and patinaed sandstone can be the location of petroglyphs and pictographs for those that seek them out.

Title:

Attributes

File Name	PJ Slopes.
Title	
Subject	
Latitude	N 38° 58' 24"
Longitude	W 108° 36' 38"
Elevation	5965 ft
Photo Direction	

There is plenty of room to explore with easy walking on the gentle slopes of pinyon and juniper.

Title:

Attributes

File Name	IMG_0123.jpg
Title	
Subject	
Latitude	N 38° 58' 24"
Longitude	W 108° 36' 41"
Elevation	6017 ft
Photo Direction	

One can spend an entire day exploring just one of the many side canyons.

Title:

Attributes

File Name	IMG_0137.jpg
Title	
Subject	
Latitude	N 38° 58' 25"
Longitude	W 108° 36' 43"
Elevation	6035 ft
Photo Direction	

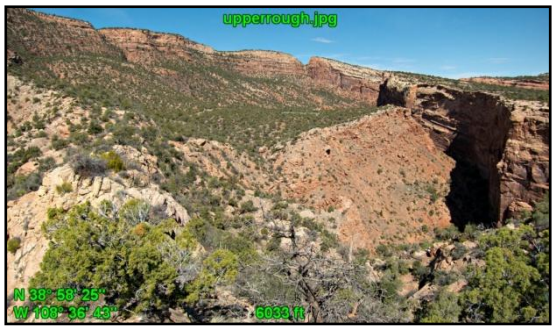
The desert blooms in spring.

Title:

Attributes

File Name	upperrough.jpg
Title	
Subject	
Latitude	N 38° 58' 25"
Longitude	W 108° 36' 43"
Elevation	6033 ft
Photo Direction	

Upper Rough Canyon from above. Large sandstone cliffs provide solitude.



Title:

Attributes

File Name	IMG_0145.jpg
Title	
Subject	
Latitude	N 38° 58' 25"
Longitude	W 108° 36' 43"
Elevation	6025 ft
Photo Direction	

Desert blooms.

Title:

Attributes

File Name	IMG_0147.jpg
Title	
Subject	
Latitude	N 38° 58' 21"
Longitude	W 108° 36' 26"
Elevation	
Photo Direction	

Slickrock and water and hidden alcoves.

Title:

Attributes

File Name	IMG_0151.jpg
Title	
Subject	
Latitude	N 38° 58' 22"
Longitude	W 108° 36' 24"
Elevation	
Photo Direction	

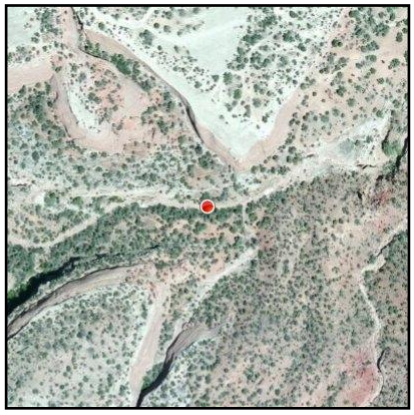
These narrow canyons provide outstanding but difficult hiking opportunities.

Title:

Attributes

File Name	IMG_0171.jpg
Title	
Subject	
Latitude	N 38° 58' 29"
Longitude	W 108° 36' 08"
Elevation	
Photo Direction	

Along the Rough Canyon trail. Verdant and screened from other users.

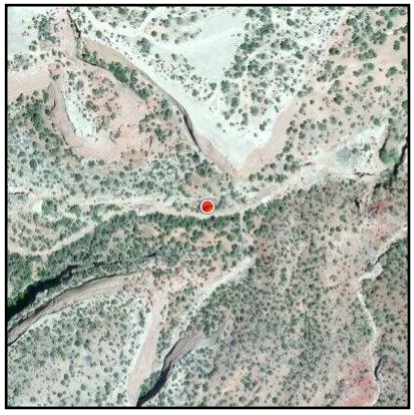


Title:

Attributes

File Name	IMG_0173.jpg
Title	
Subject	
Latitude	N 38° 58' 29"
Longitude	W 108° 36' 08"
Elevation	
Photo Direction	

Along Rough Canyon trail.

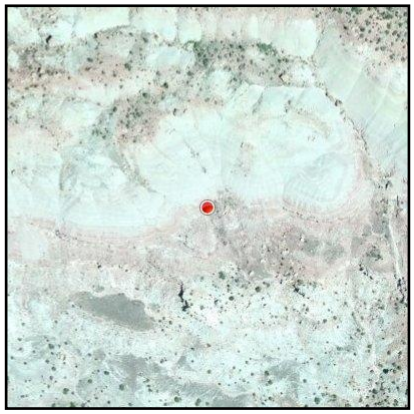


Title:

Attributes

File Name	IMG_0174.jpg
Title	
Subject	
Latitude	N 38° 58' 48"
Longitude	W 108° 35' 44"
Elevation	
Photo Direction	

A very large cottonwood shelters Rough Canyon falls.



Title:

Attributes

File Name	gentleslopes.jpg
Title	
Subject	
Latitude	N 38° 55' 20"
Longitude	W 108° 34' 50"
Elevation	6924 ft
Photo Direction	

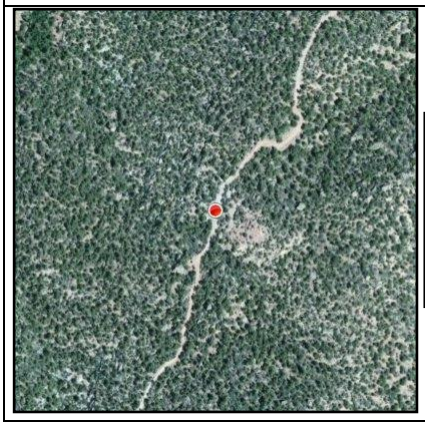
The gentle slopes near north East Creek provide hiking and exploring opportunities in complete solitude.

Title:

Attributes

File Name	
Title	
Subject	
Latitude	N 38° 55' 20"
Longitude	W 108° 34' 50"
Elevation	6934 ft
Photo Direction	

Views from the Tabeguache Trail are outstanding.

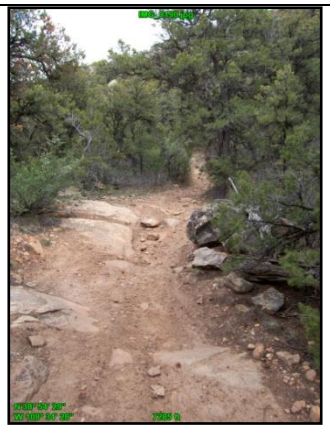


Title:

Attributes

File Name	**Waypoint 15**
Title	
Subject	
Latitude	N 38° 54' 29"
Longitude	W 108° 34' 28"
Elevation	7285 ft
Photo Direction	

Waypoint 15 – ESE along P275



Title:

Attributes

File Name	Views
Title	
Subject	
Latitude	N 38° 57' 09"
Longitude	W 108° 35' 09"
Elevation	6455 ft
Photo Direction	

Views of the Grand Valley extend all the way to Mount Garfield and the Grand Mesa.

Title:

Attributes

File Name	IMG_0193.jpg
Title	
Subject	
Latitude	N 38° 57' 09"
Longitude	W 108° 35' 09"
Elevation	6455 ft
Photo Direction	

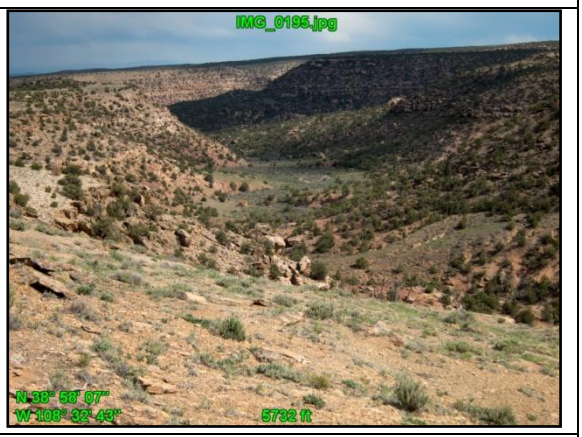
Views of Grand Valley.

Title:

Attributes

File Name	Waypoint 20
Title	
Subject	
Latitude	N 38° 58' 07"
Longitude	W 108° 32' 43"
Elevation	5732 ft
Photo Direction	

Waypoint 20 – Looking into West Bangs Canyon



Title:

Attributes

File Name	**Waypoint 20**
Title	
Subject	
Latitude	N 38° 58' 07"
Longitude	W 108° 32' 43"
Elevation	5735 ft
Photo Direction	

Waypoint 20 - Looking up West Bangs Canyon.

Title:

Attributes

File Name	West Bangs
Title	
Subject	
Latitude	N 38° 58' 07"
Longitude	W 108° 32' 42"
Elevation	5726 ft
Photo Direction	

Wildflowers above West Bangs Canyon. Outstanding opportunities for solitude and unconfined recreation.

Title:

Attributes

File Name	IMG_0202.jpg
Title	
Subject	
Latitude	N 38° 57' 39"
Longitude	W 108° 35' 59"
Elevation	6245 ft
Photo Direction	

Upper West Bangs Canyon provides outstanding primitive recreation opportunites similar to those found in lower West Bangs Canyon.

Title:

The Grand Junction Book Cliffs: Barrel Spring

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Barrel Spring unit as an area that could meet the criteria for lands with wilderness characteristics. Through spatial data analysis, the BLM identified an area of around 10,200 acres around Barrel Spring and in 2009—almost three years prior to the 2012 of BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands—these acres were inventoried by BLM. The result of this inventory was that BLM found the Barrel Spring unit meets the criteria for naturalness and size, but that it does not provide outstanding opportunities for solitude nor does it contain outstanding opportunities for primitive and/or unconfined recreation. The reasons cited for the disqualification of Barrel Spring include: "its narrow configuration"; a topography that that makes "seclusion difficult"; easy access from a nearby highway; and its "close proximity to large population centers such as Grand Junction and Fruita". The report also cites surrounding private lands as a reason the area doesn't provide outstanding unconfined recreational opportunities.

During November of 2012, The Wilderness Society visited Barrel Spring to conduct an in-depth, on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified several adjustments that should be made to the BLM's boundaries for the Barrel Spring unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map and photosheet). The result is that the Barrel Spring unit is not an individual unit, but instead connects to the unit identified in the BLM's draft inventory as the East Salt Creek unit—these units, along with several others in the area to which they in turn connect, form a unit we are calling the Grand Junction Book Cliffs unit. A map of the Grand Junction Book Cliffs unit is included in this report.

Without identifying the true boundaries of a potential LWC unit, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness

Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the boundaries BLM has proposed for the Barrel Spring unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The Barrel Spring unit, as identified by the BLM, is bounded on two sides by boundaries which do not exist on the ground and do not qualify as boundary delineation features according to BLM's own policies. Photo 1 shows the start of the western boundary line drawn by the BLM for this unit where it meets Garfield County Road 256; as seen in the photo there is neither an existing road along this boundary nor a developed right-of-way. The boundary is arbitrarily drawn. Just to the west, the route C136 appears on the BLM travel management maps for this area, however this route is clearly not maintained using mechanical means to ensure regular and continuous use, shows no signs of current use of any kind, and is overgrown and revegetating naturally. The route does not qualify as a WIR. The BLM uses BLM route C34 as the basis for the southern portion of the western boundary. C34 travels north through Hay Canyon from Highway 139, passing through private property located at the junction of Hay and Calf Canyons. At the southern end of the private property boundary C34 is gated and locked (Photo 26) and no public access is allowed. Beyond the private property, C34 does not appear to be regularly maintained using mechanical means. This route should be cherrystemmed out of the unit only as far as it meets the criteria for a WIR or other boundary delineation feature. The route does not connect to CR256 and thus does not qualify as the western boundary for the Barrel Spring unit; the actual boundary for the unit should be drawn further to the west, incorporating all the public lands between C34 and Highway 139 and excluding the two private parcels of land and their maintained access roads in Hay Canyon.

The eastern boundary of the Barrel Spring unit is also drawn over arbitrary lines. The BLM draws a boundary that follows Barrel Spring Creek and Right Fork Barrel Spring Creek to a point below the ridge forming Long Point. From here, the BLM draws a straight line up the steep ridge of Long Point, connecting the boundary to the private land parcel atop the ridge. This straight line boundary follows no on-the-ground feature whatsoever and does not qualify as a boundary according to BLM's own policies. Further, the route used for the southern portion of the eastern boundary along Barrel Spring Creek , beyond the last producing well pad on C21, does not appear to be regularly maintained using mechanical means and receives little to no use. The ways BLM identifies as C23, C20, C24, C116, and C149 are not maintained and do not qualify as WIRs. In fact, the BLM's own inventory for this unit points out "BLM Road 7690A [labeled C23 on BLM's travel management maps] exists up the Right Fork of Barrel Springs road…but receives no regular maintenance" (draft inventory p.22). Yet, despite pointing out that C23 is not maintained and despite the fact that the BLM's preferred alternative would close and rehabilitate all of these routes, the BLM chooses to use them as a boundary delineation feature for the Barrel Spring unit. These routes are not maintained using mechanical means to ensure regular and continuous use nor do they connect to the private land parcels atop the ridge leading to Long Point. For these reasons, the BLM's eastern boundary for the Barrel Spring unit should be deleted to recognize these facts, with the last producing well pad along C21 being the terminus of the cherrystemmed route up Barrel Spring Creek. All lands to the east should be added to the unit, which results in the Barrel Spring unit being connected to the BLM's East Salt Creek unit to the east.

Additional boundary and route comments for the BLM's Barrel Spring unit:

- The BLM's northern boundary for the Barrel Spring unit was drawn to follow Garfield County Road 256. However, two spur routes travel for short distances south from CR256 to primitive campsites and trailheads along Barrel Spring Point and Calf Point. These spur routes, identified as routes C123/125 (photos 14, 16, and 18) and C138/C134 (photos 4, 6, 7, and 8) provide valuable camping and hiking access and should remain open to all motor vehicles. The routes appear to be maintained using mechanical means and thus should be cherrystemmed out of the LWC unit.

- BLM route C94 is neither accessible nor passable to motorized vehicles but acts as an outstanding hiking trail along Calf Point and eventually down into Calf and Hay canyons. This route should be open to horse and foot travel as it provides an exceptional primitive recreational experience and outstanding views (Photo 9).

- BLM route C135 appears to be user created and shows no signs of construction using neither mechanical means nor regular mechanical maintenance. This route should be closed and rehabilitated as proposed in the BLM's preferred alternative.

- C136 and C137 are overgrown, nearly completely reclaimed and invisible from the ground, and have no purpose (photo 2). These routes should be closed and rehabilitated.

- C121 provides access to a large primitive campsite just south of CR256. The route appears to be user created however. While the route to the primitive campsite should remain open as an unmaintained "way" (photo 21), C121 beyond the primitive campsite should be closed and rehabilitated as it serves no purpose and has no outlet.

- C122 travels south from CR256 for a short distance before abruptly terminating. The route is not maintained using mechanical means and appears to be user-created. However, the route provides access to a popular primitive campsite just south of CR256 (photo 20). Beyond this campsite the route serves no purpose and terminates at a location without a turnaround, which is leading to resource damage. C122 should remain open as a "way" to the primitive campsite and should be closed and rehabilitated beyond that point.

- D167 is gated and locked just southeast of its intersection with CR256. This route, along with the numerous other routes to which it connects along the ridge above Roan Creek, has no public access. These routes include D167, D165, D20, D139, and C44. Because there is no public access to these routes they should be closed and rehabilitated unless providing necessary and non-redundant access to private property or permitted use.

<u>Wilderness Characteristics and the BLM's Wilderness Characteristics Determinations:</u>

The BLM determined in their draft inventory of potential lands with wilderness characteristics that the Barrel Spring unit does not contain outstanding opportunities for solitude. The BLM's narrative describing the rationale behind this determination is brief enough to cite in full:

> "Due to its narrow configuration, flat topography of the ridge top and the very steep slopes which surround the ridge make seclusion difficult from the sights and sounds of others and the visible activity in the surrounding area adjacent to the unit. The area is accessible easily from

> Colorado Highway 139 and therefore quite close in proximity to large population centers such as Grand Junction and Fruita. Finding solitude is difficult on the flat ridge top due to the lack of sufficient vegetative screening. The slopes on the unit are very steep and generally lacking in any substantial vegetation so seclusion from others or sights of the adjacent landscape make finding solitude challenging because of the constant remainder [*sic*] of human activity and impact. However, small pockets of solitude can be found throughout the unit if one is in a packet of dense Douglas Fir or in one of the gulches that fall away from the steep slopes around the periphery of the unit but they are not considered to be outstanding." (Draft Inventory, p.22 and 23)

As detailed in our narrative above, the Barrel Spring unit contains several boundary errors. Thus any statements as to the "configuration" of the unit are automatically inaccurate. The BLM seems to have made no attempt to provide rationale behind its decisions that resulted in the "narrow configuration" of the unit—not a single photograph or Route Analysis form is provided in their report for this unit, despite the guidance to do so laid out in BLM Manual 6310. If the BLM had taken the time to conduct route determinations according to Appendix C in Manual 6310, they would likely have determined that many of these boundary routes do not meet the criteria for Wilderness Inventory Roads or other qualifying features, and thus cannot be used as boundaries for this unit. Because the unit is much larger than the "narrow configuration" drawn by the BLM without supporting documentation, this should not be used as a disqualifying feature for the area's outstanding opportunities for solitude.

The draft inventory report also cites the topography of the unit as a reason that the area has no outstanding opportunities for solitude. In fact, it is exactly the topography of the unit that provides the outstanding opportunities for solitude found there. The steep slopes covered in Douglas fir and the multiple narrow drainages coming off of Pike Ridge provide countless places where one might find solitude (photo 25). The valleys of the forks of Barrel Spring Creek, Hay, and Calf Canyons are inaccessible to the public from the bottom; thus, anyone who ventures into these canyons from the top will likely be the only person in the entire area; these areas of solitude are not "small pockets" but rather entire drainages.

Finally, the fact that the Barrel Spring unit is "accessible easily" from Colorado Highway 139 has no effect on the outstanding opportunities for solitude or primitive and/or unconfined recreation found within the unit. Highway 139 is not visible from a majority of the unit, let alone heard. The "steep ridges" used by the BLM as a disqualifying feature earlier in their rationale, are the same ridges which block views of Highway 139 from a majority of the unit. If one ventures into any of the drainages pouring south off of Pike Ridge, the Highway is completed out of sight and mind.

The fact that the unit is easily accessible from Grand Junction and Fruita supplements the unit's outstanding primitive recreational opportunities, it doesn't detract from them. In fact, several areas where the BLM has identified and is managing for wilderness characteristics—including outstanding opportunities for solitude and primitive and unconfined recreation—exist much closer to these population centers. In fact, areas such as Demaree Canyon Wilderness Study Area, Little Bookcliffs Wilderness Study Area, McInnis Canyons National Conservation Area, Dominguez-Escalante National Conservation area, and Colorado National Monument are all highly valued by the public for their outstanding primitive recreation opportunities, and they all are located much closer to the population centers of Fruita and Grand Junction than is this unit.

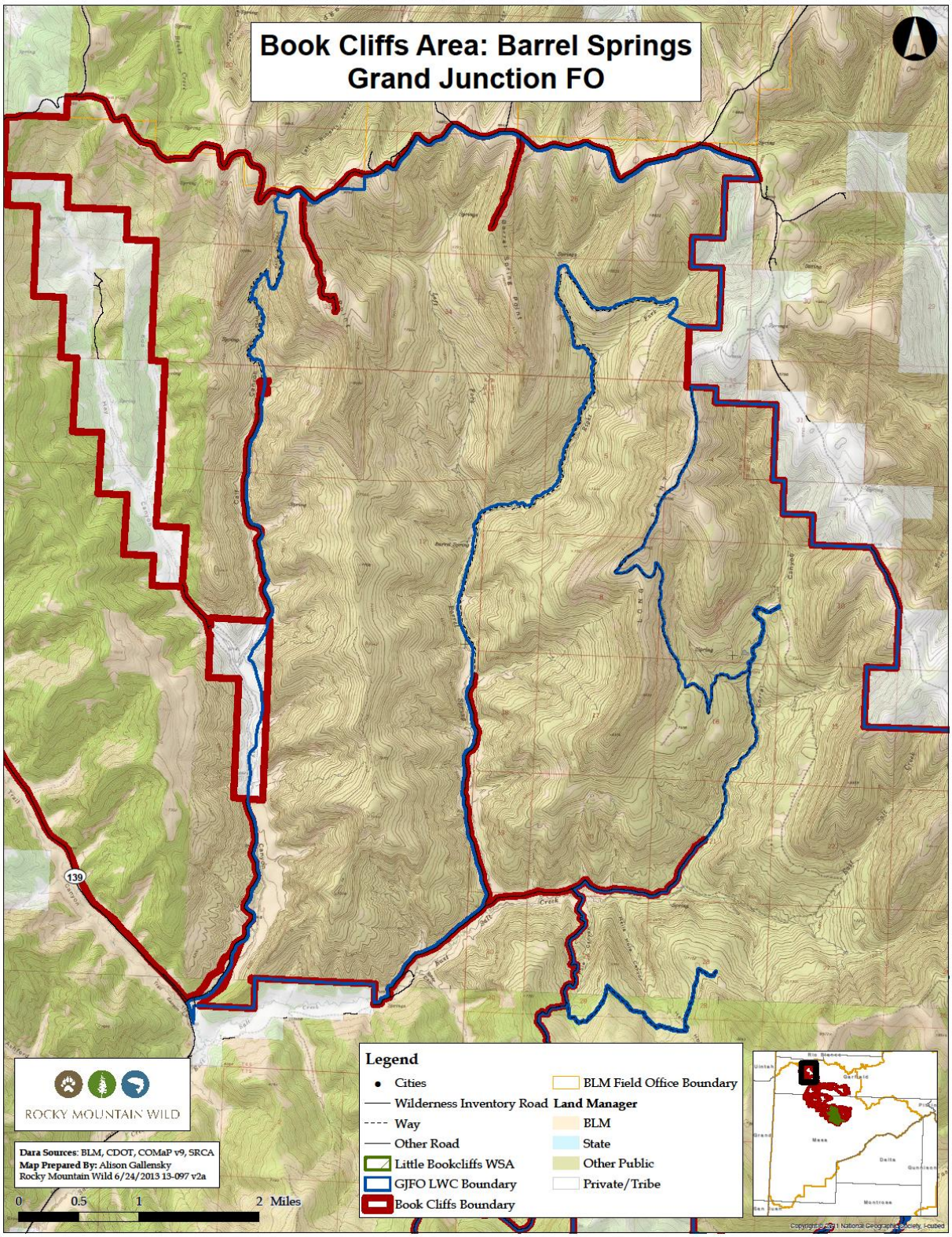
Like the BLM's rationale for not finding outstanding opportunities for solitude in the Barrel Spring unit, the rationale presented by the BLM for buttressing their finding that the area does not contain outstanding opportunities for primitive and/or unconfined recreation is even briefer than that used to describe the area's lack of opportunities for solitude. In fact, it is three sentences long and contains the single point that the area's "steep slopes, narrow configuration" and surrounding private lands "make movement in the unit difficult and inhibit travel throughout the unit" (Draft Inventory, p.23.) We've already detailed our concerns with using "narrow configuration" as a disqualifying feature in this case. Besides that, the brief rationale presented by the BLM here seems to fail to look comprehensively at the area's outstanding opportunities for primitive recreation. As pointed out in the Manual 6310, an area mustn't have both outstanding opportunities for primitive and unconfined recreation. Rather, one of either can be considered sufficient. In Barrel Spring's case, besides the fact that it connects to other units and is much larger than the area analyzed here, the unit has outstanding primitive recreational opportunities of its own that appear to have been ignored by the BLM in this report.

The area is rich in wildlife and because of that is highly valued by sportsmen. A visit to the area during hunting season reveals nearly every available primitive campsite along the periphery of the unit to be occupied by hunters. The area acts as a migration area for elk and mule deer coming off of the Book Cliffs down into the low country, and the area is recognized by Colorado Parks and Wildlife as an important area for elk, mule deer, and bear. Elk production areas exist in Barrel and Calf Creek canyons, important winter concentration areas exist further down these canyons, and a bear concentration area overlaps with the unit. These big game species, combined with the easy access provided by Highway 139 and CR256, make this area a prized location for the outstanding primitive hunting experiences it provides. Additionally, the hiking along the high ridges or in the dark and shady canyons provides a unique primitive recreational experience. In the summer months, when the rest of the Grand Valley sits in temperatures frequently exceeding 100 degrees, the dark pines and cool canyons of the Barrel Spring unit provide outstanding opportunities to hike when virtually everywhere else in the area is baking in the summer sun.

Summary and Recommendation:

The area identified in the BLM's draft inventory as the Barrel Spring unit is defined by boundaries that do not meet the criteria for Wilderness Inventory Roads or other qualifying boundary features. Because of this, the area analyzed in the BLM's draft inventory report is only part of the complete picture for this area. The determinations made in this report as to the area's outstanding wilderness characteristics are not based on complete data and thus should be discounted until the full area—identified later in this report as the Grand Junction Book Cliffs unit—can be fully inventoried. And yet despite the fact that the BLM only inventoried a small portion of the actual qualifying lands in this area, they still failed to identify or recognize the wilderness characteristics that exist here.

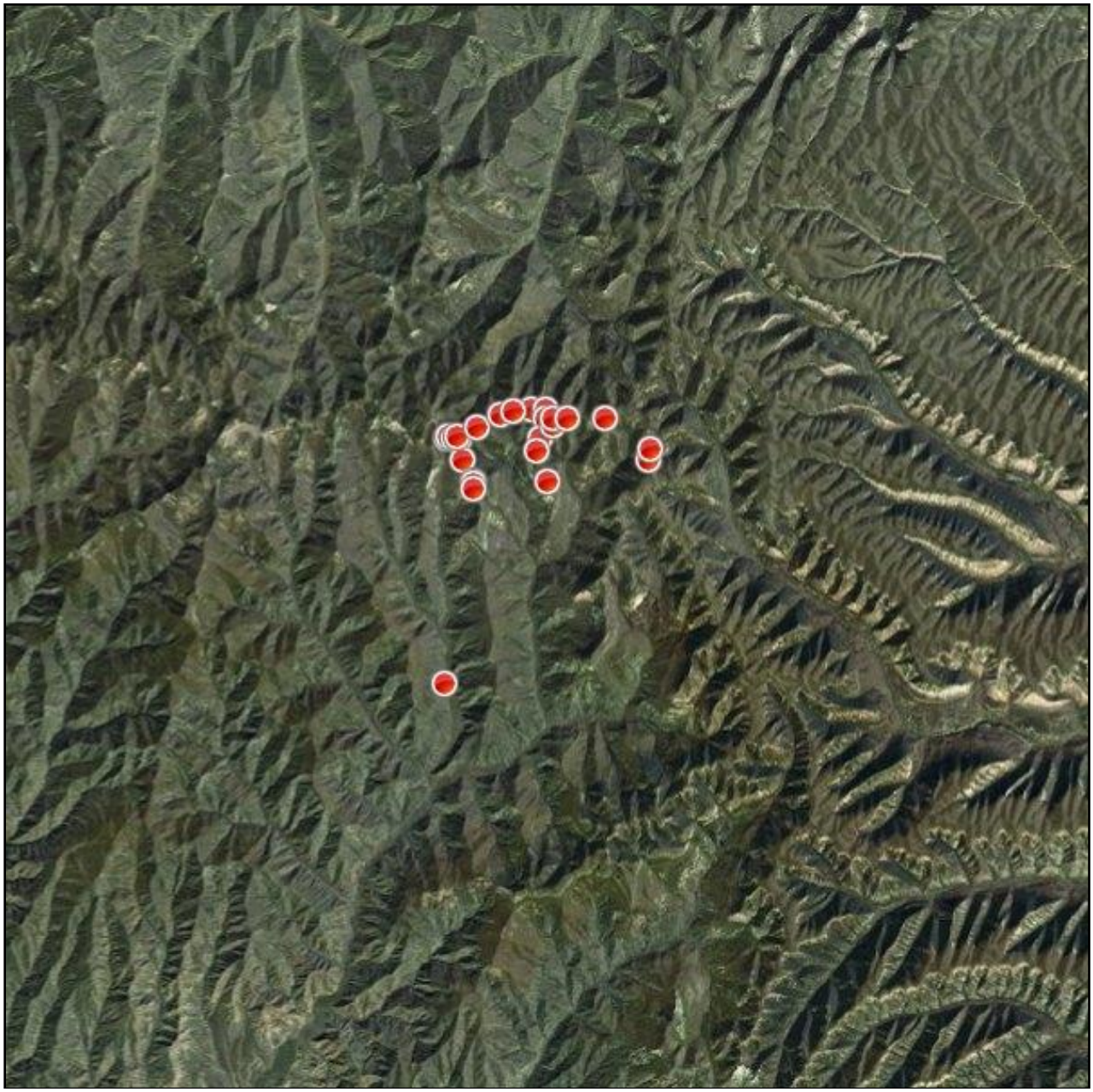
The Barrel Spring unit should be re-inventoried as part of the larger Grand Junction Book Cliffs unit and any determinations made as to the wilderness characteristics found or not found therein should be documented with geotagged photographs, maps, and route analysis forms (none of which appear in the BLM's draft inventory for this unit) as required by BLM Manual 6310.


Book Cliffs Area: Barrel Springs
Grand Junction FO
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/24/2013 13-097 v2a
0 0.5 1 2 Miles
Legend
Cities
Wilderness Inventory Road
Way
Other Road
Little Bookcliffs WSA
GJFO LWC Boundary
Book Cliffs Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
139

The Grand Junction Book Cliffs Unit:
Barrel Spring Photopoints

The following photopoints contain location coordinates. Photos that correspond to Waypoints on the attached map are labeled in bold.

Overview Map



Attributes	
File Name	2012 11 08_5727.jpg
Title	
Subject	
Latitude	N 39° 35' 43"
Longitude	W 108° 44' 26"
Elevation	8684 ft
Photo Direction	235° SW

1 -

Title:

Attributes	
File Name	2012 11 08_5728.jpg
Title	
Subject	
Latitude	N 39° 35' 41"
Longitude	W 108° 44' 28"
Elevation	8602 ft
Photo Direction	190° S

2 -

Title:

Attributes	
File Name	2012 11 08_5729.jpg
Title	
Subject	
Latitude	N 39° 35' 42"
Longitude	W 108° 44' 28"
Elevation	8663 ft
Photo Direction	9° N

3 -

Title:

Attributes	
File Name	2012 11 08_5730.jpg
Title	
Subject	
Latitude	N 39° 35' 41"
Longitude	W 108° 44' 20"
Elevation	8676 ft
Photo Direction	149° SSE

4 -

Title:

Attributes	
File Name	2012 11 08_5731.jpg
Title	
Subject	
Latitude	N 39° 35' 38"
Longitude	W 108° 44' 13"
Elevation	8797 ft
Photo Direction	118° ESE

5 -

Title:

Attributes	
File Name	2012 11 08_5732.jpg
Title	
Subject	
Latitude	N 39° 35' 17"
Longitude	W 108° 44' 06"
Elevation	8760 ft
Photo Direction	0° N

6 -

Title:

Attributes	
File Name	2012 11 08_5733.jpg
Title	
Subject	
Latitude	N 39° 34' 55"
Longitude	W 108° 43' 53"
Elevation	8185 ft
Photo Direction	0° N

7 -

Title:

Attributes	
File Name	2012 11 08_5734.jpg
Title	
Subject	
Latitude	N 39° 34' 52"
Longitude	W 108° 43' 52"
Elevation	8133 ft
Photo Direction	0° N

8 -

Title:

Attributes	
File Name	2012 11 08_5735.jpg
Title	
Subject	
Latitude	N 39° 34' 47"
Longitude	W 108° 43' 52"
Elevation	4651 ft
Photo Direction	56° NE

9 -

Title:

Attributes	
File Name	2012 11 08_5736.jpg
Title	
Subject	
Latitude	N 39° 35' 42"
Longitude	W 108° 44' 14"
Elevation	8124 ft
Photo Direction	0° N

10 -

Title:

Attributes	
File Name	2012 11 08_5737.jpg
Title	
Subject	
Latitude	N 39° 35' 52"
Longitude	W 108° 43' 48"
Elevation	8702 ft
Photo Direction	6° N

11 -

Title:

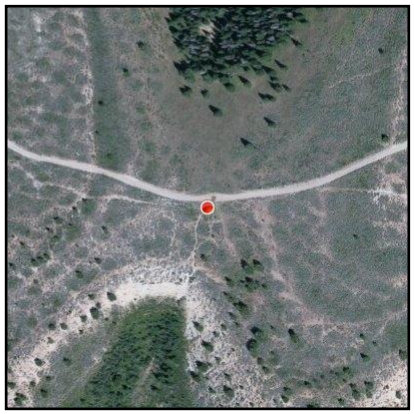
Attributes	
File Name	2012 11 08_5738.jpg
Title	
Subject	
Latitude	N 39° 36' 04"
Longitude	W 108° 43' 15"
Elevation	4565 ft
Photo Direction	0° N

12 -

Title:

Attributes	
File Name	2012 11 08_5739.jpg
Title	
Subject	
Latitude	N 39° 36' 10"
Longitude	W 108° 42' 34"
Elevation	8802 ft
Photo Direction	67° ENE

13 -



Title:

Attributes	
File Name	2012 11 08_5740.jpg
Title	
Subject	
Latitude	N 39° 36' 11"
Longitude	W 108° 42' 13"
Elevation	8848 ft
Photo Direction	197° SSW

14 -

Title:

Attributes	
File Name	2012 11 08_5741.jpg
Title	
Subject	
Latitude	N 39° 36' 02"
Longitude	W 108° 42' 14"
Elevation	8860 ft
Photo Direction	164° SSE

15 -

Title:

Attributes	
File Name	2012 11 08_5742.jpg
Title	
Subject	
Latitude	N 39° 35' 41"
Longitude	W 108° 42' 21"
Elevation	8684 ft
Photo Direction	202° SSW

16 -

Title:

Attributes	
File Name	2012 11 08_5743.jpg
Title	
Subject	
Latitude	N 39° 34' 55"
Longitude	W 108° 42' 11"
Elevation	8623 ft
Photo Direction	152° SSE

17 -

Title:

Attributes	
File Name	2012 11 08_5744.jpg
Title	
Subject	
Latitude	N 39° 35' 26"
Longitude	W 108° 42' 27"
Elevation	4597 ft
Photo Direction	0° N

18 -

Title:

Attributes	
File Name	2012 11 08_5745.jpg
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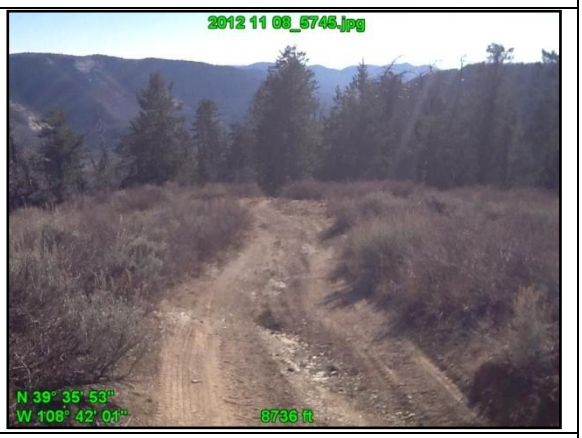
Subject	
Latitude	N 39° 35' 53"
Longitude	W 108° 42' 01"
Elevation	8736 ft
Photo Direction	191° S

19 -



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Attributes	
File Name	2012 11 08_5746.jpg
Title	
Subject	
Latitude	N 39° 36' 01"
Longitude	W 108° 42' 01"
Elevation	8769 ft
Photo Direction	19° NNE

20 -

Title:

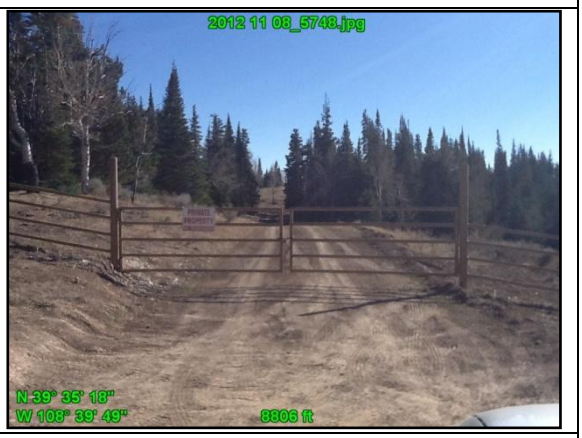
Attributes	
File Name	2012 11 08_5747.jpg
Title	
Subject	
Latitude	N 39° 36' 01"
Longitude	W 108° 41' 42"
Elevation	8772 ft
Photo Direction	190° S

21 -

Title:

Attributes	
File Name	2012 11 08_5748.jpg
Title	
Subject	
Latitude	N 39° 35' 18"
Longitude	W 108° 39' 49"
Elevation	8806 ft
Photo Direction	175° S

22 -



Title:

Attributes	
File Name	2012 11 08_5749.jpg
Title	
Subject	
Latitude	N 39° 35' 29"
Longitude	W 108° 39' 49"
Elevation	4695 ft
Photo Direction	0° N

23 -

Title:

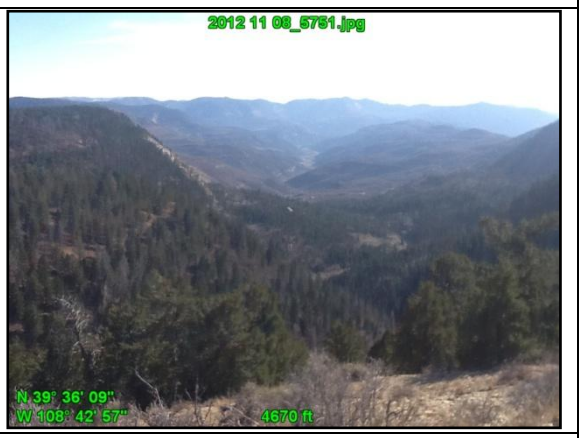
Attributes	
File Name	2012 11 08_5750.jpg
Title	
Subject	
Latitude	N 39° 36' 02"
Longitude	W 108° 40' 49"
Elevation	8855 ft
Photo Direction	227° SW

24 -

Title:

Attributes	
File Name	2012 11 08_5751.jpg
Title	
Subject	
Latitude	N 39° 36' 09"
Longitude	W 108° 42' 57"
Elevation	4670 ft
Photo Direction	0° N

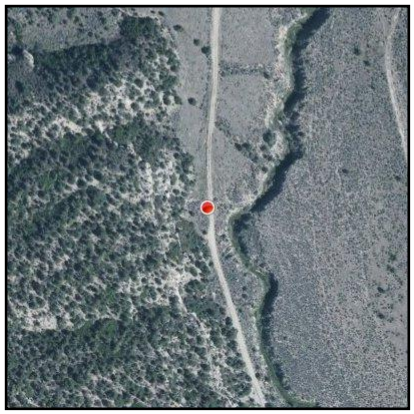
25 -



Title:

Attributes	
File Name	2012 11 08_5752.jpg
Title	
Subject	
Latitude	N 39° 31' 19"
Longitude	W 108° 44' 31"
Elevation	6040 ft
Photo Direction	0° N

26 –



Title:

The Grand Junction Book Cliffs unit

Summary, Boundary Delineation and Recommendation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified approximately 400,000 acres of lands that could contain wilderness characteristics. After eliminating several units, the BLM inventoried 31 total units. However as detailed in the intro to this report, these inventories inadequate for several reasons, including the fact that they relied upon numerous boundary lines that do not meet the criteria for boundary delineation as outlined in BLM Manual 6310 and which result in arbitrarily leaving out qualifying acreage, or as is the case with The Grand Junction Book Cliffs unit, dividing a very large unit up into many smaller ones and then determining that some of these smaller units do not meet the criteria for outstanding opportunities for solitude or unconfined recreation—which would have easily been found if assessing the entirety of the larger qualifying unit.

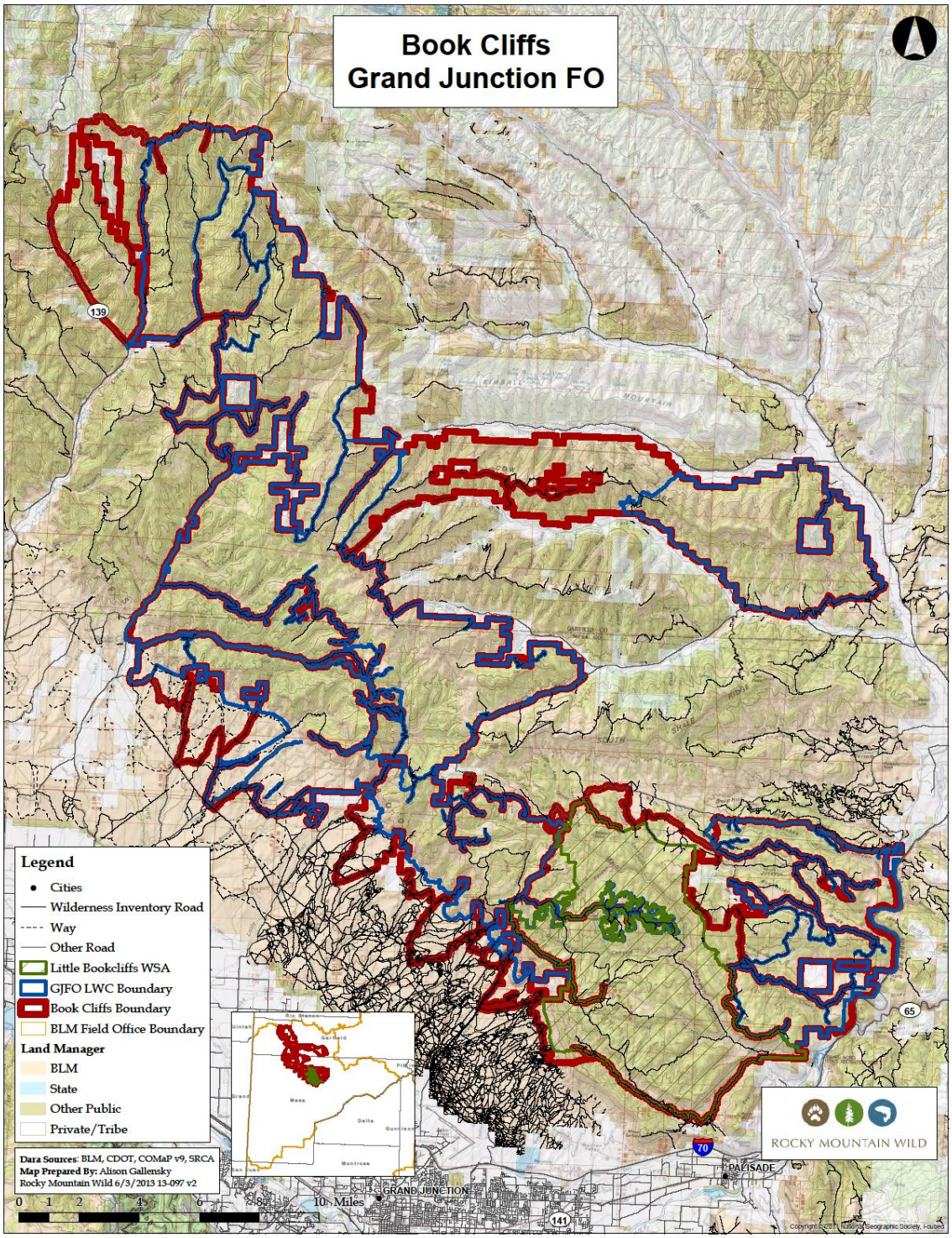
During 2012 and 2013, The Wilderness Society and Conservation Colorado inventoried the vast majority of the Grand Junction field office. Our goal was to assess whether the BLM's draft inventory boundaries for the units put forth by BLM met the criteria for an LWC boundaries as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the units in the BLM's draft inventory after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

TWS identified several adjustments that should be made to the BLM's boundaries throughout the field office to better bring them in line with the policies for boundary delineation described in Manual 6310. Our inventory shows that the units that the BLM analyzed separately as the Barrel Spring, County Line, Cow Ridge, East Salt Creek, Hunter Canyon, Lipan Wash, Little Bookcliffs WSA expansion area, Main Canyon, and Asbury and Track Ridges units in fact are all contiguous with each other and share a single common boundary. This unit, along with additional acreage detailed in the inventory reports for each of the aforementioned units, we have chosen to call The Grand Junction Book Cliffs unit. A map of the Grand Junction Book Cliffs unit is included in this report.

Because a significant percentage of the Grand Junction Book Cliffs unit is made up of the BLM's Hunter Canyon and East Salt Creek units, where the BLM found outstanding wilderness characteristics, and because another percentage of the Grand Junction Book Cliffs unit contains acreage adjacent and contiguous with the Little Bookcliffs Wilderness Study Area, it can be assumed that much of the Grand Junction Book Cliffs unit outside of these areas contains these outstanding wilderness characteristics as well. However without identifying the true boundaries of a potential LWC unit as defined by Manual 6310, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

The Grand Junction Book Cliffs unit should be re-inventoried in its entirety and any determinations made as to the wilderness characteristics found or not found therein should be documented with geotagged photographs, maps, and route analysis forms as required by BLM Manual 6310.



Brush Mountain

Summary and Wilderness Characteristics Determinations:

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Brush Mountain unit as an area that could meet the criteria for lands with wilderness characteristics. Through spatial data analysis, the BLM identified an area of around 5,300 acres around Carr Creek and in 2011—prior to the release of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands—these acres were inventoried by BLM. The result of this inventory was that BLM found the Brush Mountain unit to meet the size and naturalness criteria; however, the contractor hired by BLM to conduct the inventory was unable to find outstanding opportunities for solitude or primitive and/or unconfined recreation. Not a single photograph, waypoint, or Road Analysis form is included in the draft inventory report for this area to supplement the BLM's claims as to the area's failure to meet the criteria for consideration as a Lands with Wilderness Characteristics. Further, the report mentions a "Palisade Rim Trail" in the section on recreation, however to the best of our knowledge there is no such trail in the Brush Mountain unit. (A Palisade Rim Trail exists on BLM lands just outside of Palisade, CO, but we were unable to find any evidence of one occurring anywhere near this unit). In short, it is doubtful that the Brush Mountain unit was actually visited in person by the contractor hired to conduct the inventory of this unit and as such the inventory is incomplete, and should not be used as the basis for management decisions for this area.

The BLM's draft inventory found that the Brush Mountain unit did not contain outstanding opportunities for solitude, yet the only supporting documentation for this finding is a single sentence within a two-sentence paragraph. After acknowledging the opportunities for solitude present in the area in the first sentence, the report cites the area's small size, topography, and surrounding private lands as the reason that these opportunities for solitude are not outstanding. This is a subjective determination without basis. First, the area's size (5,300 acres) meets the criteria for a Lands with Wilderness Characteristics; beyond that, the size of the unit is irrelevant in assessing the wilderness characteristics located therein. Similarly, the fact that the unit is almost completely surrounded by private land (private land that is almost completely undeveloped and roadless) should have no effect on the opportunities for solitude found within the unit itself. In fact, because of the difficulty of access and the surrounding undeveloped private lands, anyone who achieves access to this unit—either through permission from a landowner or through difficult cross-country travel over the public lands atop Brush Mountain—will experience profound and total solitude. Visitation to this unit is very, very low and thus opportunities for solitude are outstanding and easily found once inside the unit.

The Brush Mountain unit is essentially the upper six miles or so of a large canyon containing Carr Creek, with canyon walls that rise almost 2000 vertical feet at their deepest. Carr Creek was found eligible by the BLM for inclusion in the federal Wild and Scenic Rivers system (Carr Creek contains a core conservation population of Colorado River cutthroat trout, which is a Colorado Species of Special Concern. Recent genetic studies by Colorado Parks and Wildlife indicate that this population may in fact be the rare Greenback Cutthroat trout species, which is currently listed as threatened under the Endangered Species Act.) Yet, the BLM's draft inventory for this unit gives very short consideration to the outstanding primitive and/or unconfined recreational opportunities that the topography and Carr Creek itself could provide. In a very generic three-sentence paragraph, the BLM cites the "orientation of the boundaries and the topographical layout of the unit" as the basis for its determination that the area does not possess either outstanding opportunities for primitive recreation or outstanding opportunities for unconfined recreation. This is equivalent to saying that any deep canyon surrounded by private

land does not contain outstanding opportunities for primitive or unconfined recreation. No specifics are provided to define why this particular deep canyon surrounded by private land doesn't provide outstanding opportunities for solitude. Nor does the BLM consider or even mention the outstanding primitive recreation opportunities that are available for anybody who ventures into the unit to fish Carr Creek.

Summary and Recommendation:

The Brush Mountain unit not only meets the criteria for size and naturalness as recognized by the BLM, but also possesses outstanding opportunities for solitude and primitive recreation. Because the unit is so difficult to access, anybody who makes their way into the unit will undoubtedly find absolute solitude. In addition, the isolation of the unit and the difficulty of access, combined with the deep canyon walls and clear-running Carr Creek that splits the unit—provide outstanding primitive recreational opportunities, especially backcountry fishing. The Brush Mountain unit should be re-inventoried and any determinations made as to the wilderness characteristics found or not found therein should be documented with geotagged photographs, maps with waypoints, and route analysis forms (none of which appear in the BLM's draft inventory for this unit) as required by BLM Manual 6310.

Grand Junction Book Cliffs Unit: County Line

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the County Line unit as an area that could meet the criteria for lands with wilderness characteristics. Through spatial data analysis, the BLM identified an area of around 7,400 acres between Garvey and Coal Gulch canyons Line and in 2011—prior to the release in 2012 of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands—these acres were inventoried by BLM. The result of this inventory was that BLM found the County Line unit meets the criteria for naturalness and size, but that it does not provide outstanding opportunities for solitude nor does it contain outstanding opportunities for primitive and/or unconfined recreation. The reasons cited for the disqualification of County Line include: suggestions that opportunities for solitude are found only within a portion of the unit; steep and exposed slopes; and "poorly screened" oil and gas facilities outside of the unit. The report repeatedly compares the unit to areas outside of the unit using terms like "in a regional context" and "regionally typical characteristics" contrary to guidance in revised BLM Manual 6310 which clearly instructs not to compare units and to assess the wilderness characteristics within the unit only.

During November of 2012 and June of 2013, The Wilderness Society and Conservation Colorado visited County Line to conduct an in-depth, on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified several adjustments that should be made to the BLM's boundaries for the County Line unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map and photosheet). The result is that the County Line unit is not an individual unit, but instead connects to the unit identified in the BLM's draft inventory as the Hunter Canyon unit, which in turn connects to several additional potential LWC units including Lipan Wash. These units together form a unit we are calling The Grand Junction Book Cliffs unit. A map and narrative describing the Grand Junction Book Cliffs unit is included in this report.

Because BLM did not accurately define the true boundaries of the potential LWC unit County Line, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the boundaries BLM has proposed for the County Line unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The County Line unit, as identified by the BLM, is bounded on its east side by boundaries which do not exist on the ground and/or do not qualify as boundary delineation features according to BLM's own policies. Near the end of BLM route I721, the BLM drew a boundary directly down the steep northern slopes of Coal Gulch (photos 5 and 6) and then east up the bottom of Coal Gulch connecting to the terminus of I12 (I12 does not qualify as a WIR either; it is overgrown, impassable to vehicles, and not maintained using mechanical means). The entire length of this boundary from I721 to I12 is drawn over no existing Wilderness Inventory Roads or other qualifying boundary features (photo 6) and thus doesn't qualify as an LWC boundary according to BLM's own policies. This boundary should be deleted and the BLM's County Line and Hunter Canyon units combined into a single unit. The upper end of Garvey Canyon road (H40 and I721) should be cherrystemmed out of the combined unit as the route is maintained (bladed) from Garfield County Road 205 to provide access to several producing oil and gas well pads along its length.

Additional boundary and route comments for the BLM's County Line unit:

- H57 travels steeply down Garvey Canyon from H40 and is not constructed nor maintained using mechanical means. The route does not qualify as a WIR and should be deleted from the LWC unit. For Travel Management purposes, the route does not appear to provide any administrative purpose as it leads to no grazing infrastructure or active well pads; the route should be closed and rehabilitated.

- H43 is overgrown and impassable to motor vehicles. The BLM's cherrystem of this route from the LWC unit should be deleted and for TMP purposes the route should be closed and rehabilitated.

- H44 contains significant vegetative growth and is nearly indiscernible on the ground. The route leads to no existing energy infrastructure. The BLM's cherrystem of this route from the LWC unit should be deleted as it does not qualify as a WIR. For TMP purposes the route should be closed and rehabilitated.

- The routes denoted on the BLM's TMP maps as H46, H47, H49, H55, and H56 are misplaced on those maps and do not exist on the ground in those locations. Instead a Y-shaped route departs H40 just north of H46 and leads to two active oil and gas well pads. This shorter y-shaped route should be cherrystemmed out of the LWC unit. The misplaced routes listed above should be deleted from the TMP maps.

- H50/I1027 is impassable to motor vehicles and travels directly down an intermittent wash (photos 16 and 18). This route should be closed to motorized travel.

- H51 and H52 are very short routes that are not maintained and have no discernible purpose. These routes should be closed to motorized travel.

- The routes I11, I12, I14, I1032, I1034, I1029, and I1030 are not maintained and do not qualify as WIRs (photos 20 – 22). They should not be cherrystemmed out of the LWC as BLM has done in its draft inventory. For TMP purposes, these routes should be closed to motorized travel.

Wilderness Characteristics and the BLM's Wilderness Characteristics Determinations:

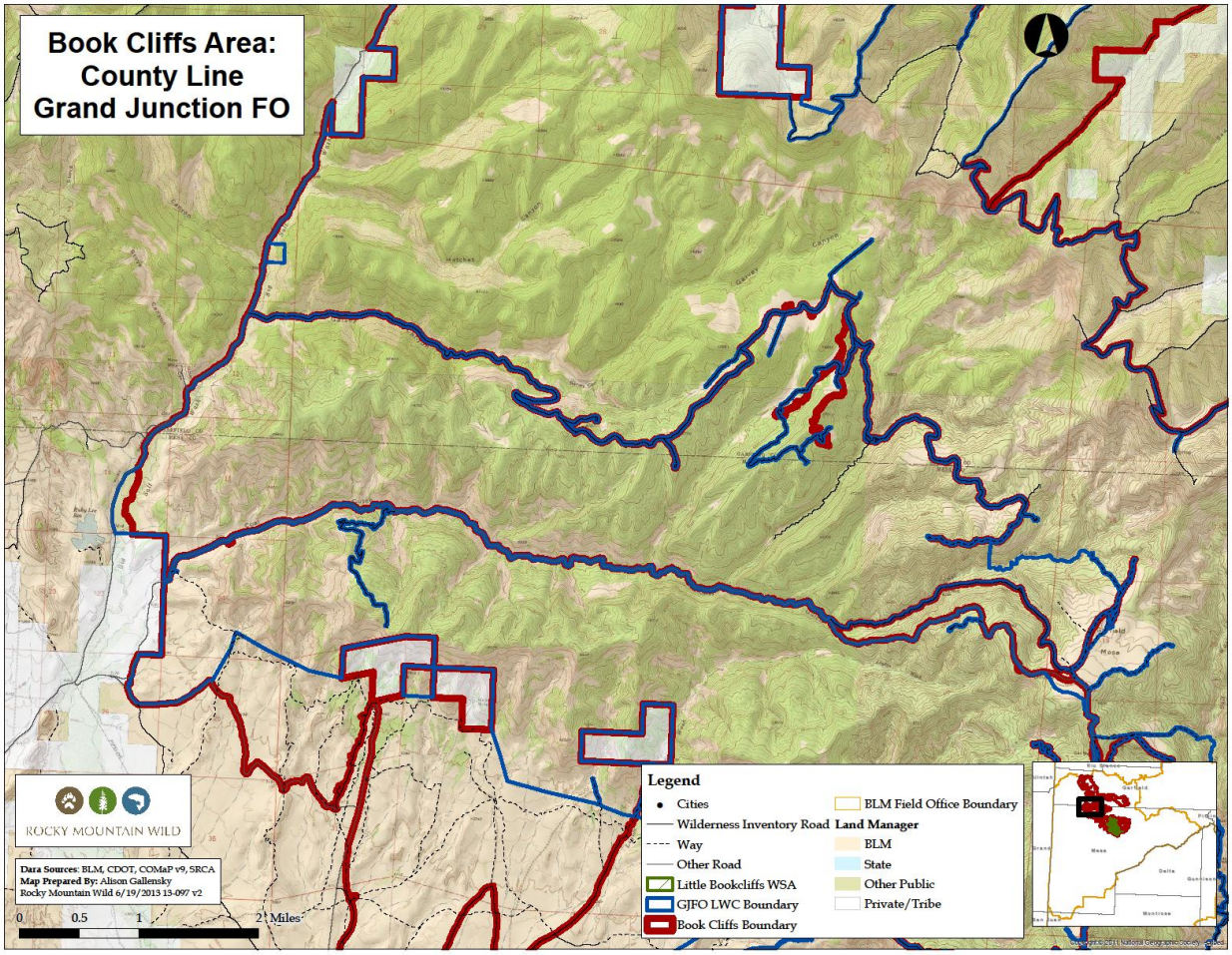
Because the boundaries drawn by the BLM for the County Line unit contained inaccuracies, any assessment of the wilderness characteristics located within the unit are not based on full information. In fact, the County Line has no qualifying boundary delineation feature separating it from the BLM's adjacent Hunter Canyon unit—a unit that the BLM found to meet the criteria of a Lands with Wilderness Characteristics. Because these two units are actually a single unit, the same wilderness characteristics identified by the BLM in the Hunter Canyon unit also exist in the County Line unit. However, it is worth commenting on the BLM's assessment of the wilderness characteristics in the County Line unit.

The BLM determined in their draft inventory of potential lands with wilderness characteristics that although "[o]pportunities for solitude are present" within the unit, "these opportunities are limited to [the eastern portion of the unit]" (Draft Inventory, p.45). However BLM guidance in Manual 6310 states instructs: "Do not disqualify an area based on a finding that outstanding opportunities exist in only a portion of the area." (Manual 6310, p.7) Further, the finding that the opportunities for solitude in the unit are not outstanding seems to be based on a comparison with other areas outside the unit. The draft inventory states, "In a regional context, this unit does not offer outstanding opportunities for solitude." Again, BLM guidance states: "Do not compare the lands in question with other parcels. Do not use any type of rating system or scale—whether numerical, alphabetical, or qualitative—in making the assessment. Use professional judgment in determining whether outstanding opportunities exist in each area and document in writing the rationale for arriving at the determination." (Manual 6310, p.7) Whether because the County Line inventory was completed by BLM prior to the publication of the new BLM guidance on conducting LWC inventories, or whether it was a simple oversight, the draft inventory for the County Line unit seems to both compare the lands in question with other parcels while failing to assess the opportunities for solitude present within the unit itself, but also fails to "document in writing the rationale for arriving at the determination". All that is provided is a subjective statement by the contractor who conducted the inventory that the County Line unit's opportunities for solitude are not outstanding "in a regional context"; no further documentation or rationale is given to support that claim.

Summary and Recommendation:

The area identified in the BLM's draft inventory as the County Line unit is defined by boundaries that do not meet the criteria for Wilderness Inventory Roads or other qualifying boundary features. Because of this, the area analyzed in the BLM's draft inventory report is only part of the complete picture for this area. In fact, the area described by the BLM as the County Line unit is actually contiguous with both the Lipan Wash unit to the south and the Hunter Canyon unit to the east and north. Because of this, the

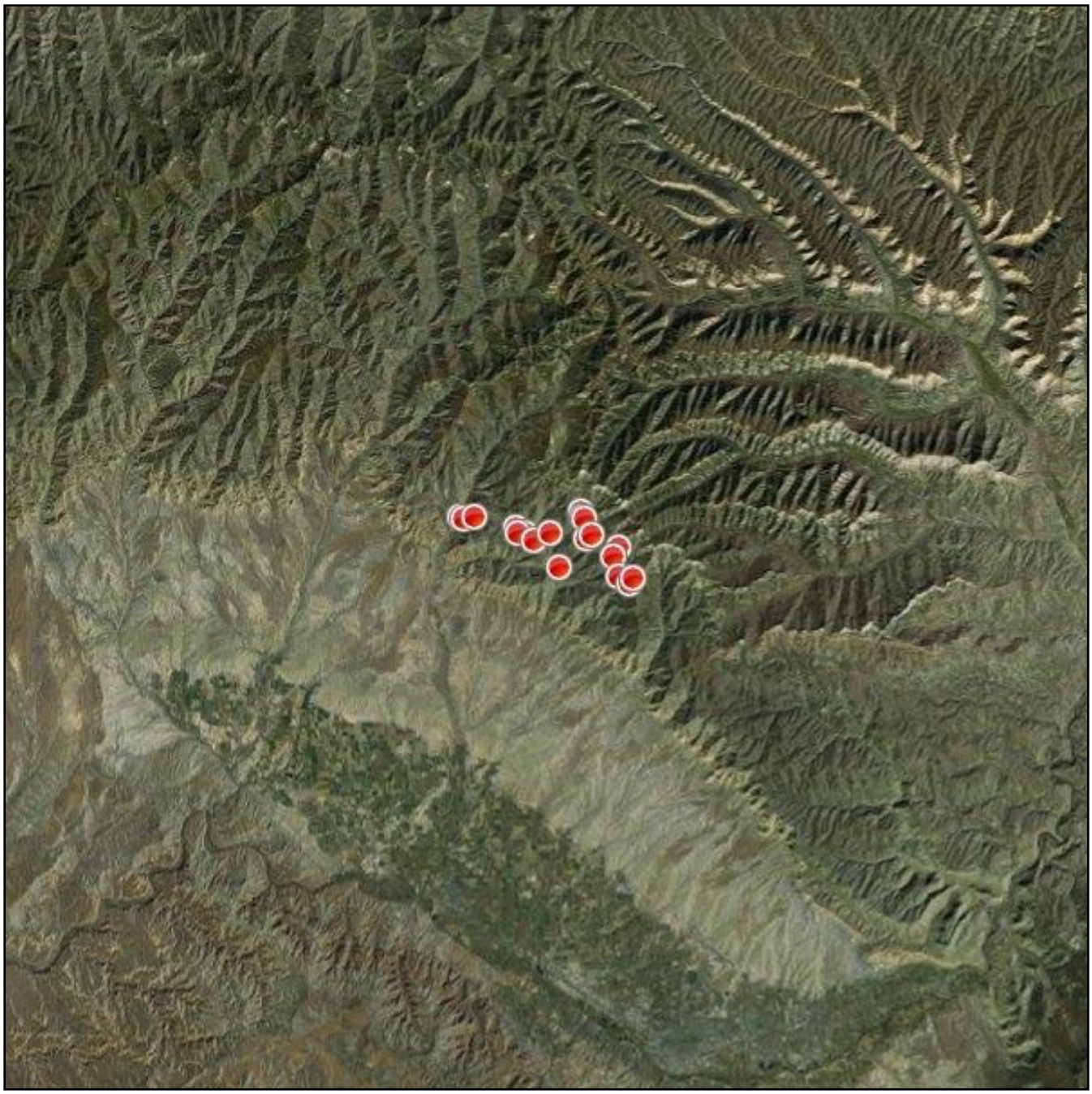
determinations made by the BLM about the County Line unit's lack of outstanding opportunities for solitude and primitive and/or unconfined recreation are incorrect. The BLM must re-inventory the entire area that qualifies as a potential lands with wilderness characteristics under current BLM guidance and any determinations made in that inventory as to the unit's boundaries or wilderness characteristics should be fully documented with geotagged photographs, maps, and Route Analysis forms s required by BLM Manual 6310.



Grand Junction Book Cliffs Unit: County Line

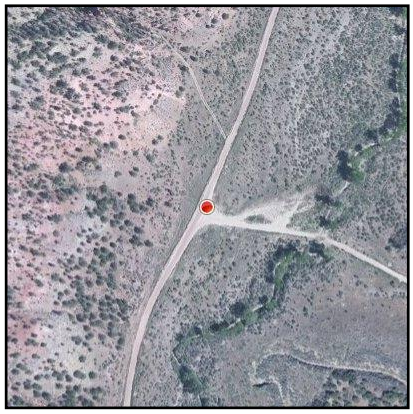
The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph.

Overview Map



Attributes	
File Name	IMG_20130605_101457.jpg
Title	
Subject	
Latitude	N 39° 22' 54"
Longitude	W 108° 43' 22"
Elevation	
Photo Direction	

1 – Looking east at the start of Garvey Canyon road (H40). This road provides access to several producing oil and gas well pads as well as access to extensive recreation opportunities and should remain open to all vehicles.



Title:

Attributes	
File Name	IMG_20130605_101952.jpg
Title	
Subject	
Latitude	N 39° 22' 51"
Longitude	W 108° 43' 15"
Elevation	
Photo Direction	

2 – East up H40 (Garvey Canyon Road). The route is bladed and maintained. The convoluted and vegetated slopes of the ridge separating Garvey Canyon and Coal Gulch are visible in the background. The slopes provide outstanding hunting and hiking opportunities.

Title:

Attributes	
File Name	IMG_20130605_102422.jpg
Title	
Subject	
Latitude	N 39° 22' 53"
Longitude	W 108° 42' 43"
Elevation	
Photo Direction	

3 – East up H40 with the south-facing slopes abovie Garvey Canyon in the background.

Title:

Attributes	
File Name	IMG_20130605_112558.jpg
Title	
Subject	
Latitude	N 39° 22' 14"
Longitude	W 108° 37' 17"
Elevation	
Photo Direction	

4 – northeast up H40 beyond the point where BLM would close H40 to all vehicles unless authorized. This portion of H40 should remain open to all vehicles as it provides valuable recreation access. The white cliffs in the background are the upper boundary of the BLM's Hunter Canyon unit.

Title:

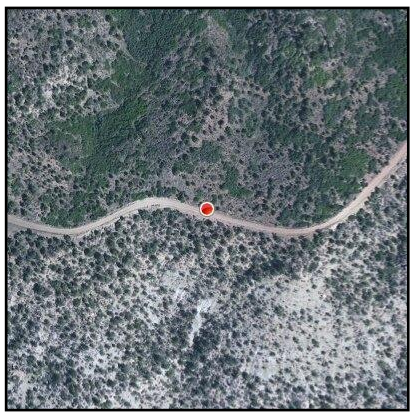
Attributes	
File Name	IMG_20130605_114132.jpg
Title	
Subject	
Latitude	N 39° 21' 26"
Longitude	W 108° 36' 20"
Elevation	
Photo Direction	

5 – Looking southeast along the point where the BLM redirects the County Line boundary off of I721/H40 and directly down the slope to the bottom of Coal Gulch. No road or other qualifying feature exists below this point. The carsonite post denotes a pipeline that travels along I721 from the producing well pad at its terminus.

Title:

Attributes	
File Name	IMG_20130605_114708.jpg
Title	
Subject	
Latitude	N 39° 21' 27"
Longitude	W 108° 36' 20"
Elevation	
Photo Direction	

6 – Looking south and southeast down BLM's draft boundary for the County Line unit. No WIR or other boundary feature exists here. The boundary does not exist on the ground and is arbitrarily placed. The route visible across Coal Gulch is BLM route I906.



Title:

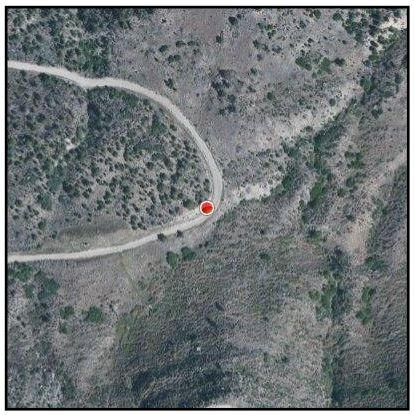
Attributes	
File Name	IMG_20130605_103428.jpg
Title	
Subject	
Latitude	N 39° 22' 33"
Longitude	W 108° 40' 52"
Elevation	5823 ft
Photo Direction	

7 – east up H40. Maintained (bladed).

Title:

Attributes	
File Name	IMG_20130605_103840.jpg
Title	
Subject	
Latitude	N 39° 22' 22"
Longitude	W 108° 40' 28"
Elevation	6194 ft
Photo Direction	

8 – looking west at the switchbacks on H40. A pipeline follows this route.



Title:

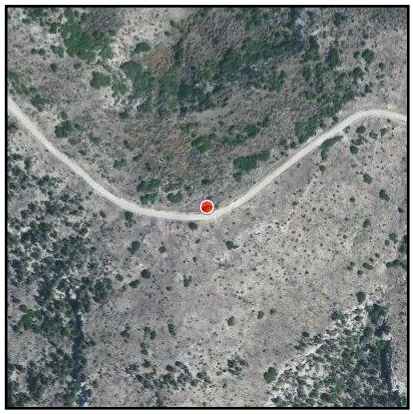
Attributes	
File Name	IMG_20130605_104305.jpg
Title	
Subject	
Latitude	N 39° 22' 18"
Longitude	W 108° 40' 43"
Elevation	6404 ft
Photo Direction	

9 – H40

Title:

Attributes	
File Name	IMG_20130605_104811.jpg
Title	
Subject	
Latitude	N 39° 22' 03"
Longitude	W 108° 40' 01"
Elevation	6814 ft
Photo Direction	

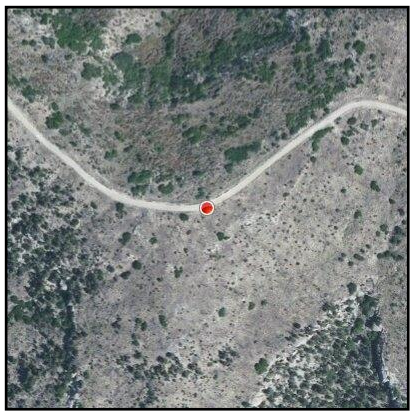
10 – Northeast along H40.



Title:

Attributes	
File Name	IMG_20130605_104859.jpg
Title	
Subject	
Latitude	N 39° 22' 03"
Longitude	W 108° 40' 00"
Elevation	6736 ft
Photo Direction	

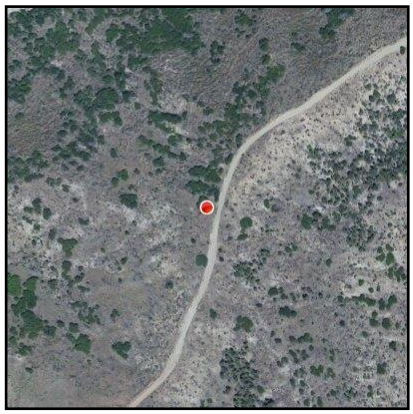
11 – duplicate of previous slide.

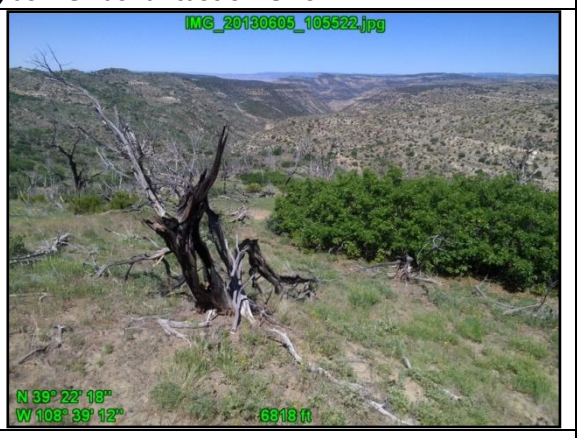


Title:

Attributes	
File Name	IMG_20130605_105522.jpg
Title	
Subject	
Latitude	N 39° 22' 18"
Longitude	W 108° 39' 12"
Elevation	6818 ft
Photo Direction	

12 – Looking west down Garvey Canyon from H40. Although sparsely vegetated, the slopes along Garvey Canyon provide outstanding hunting and hiking opportunities, as well as fantastic views.





Title:

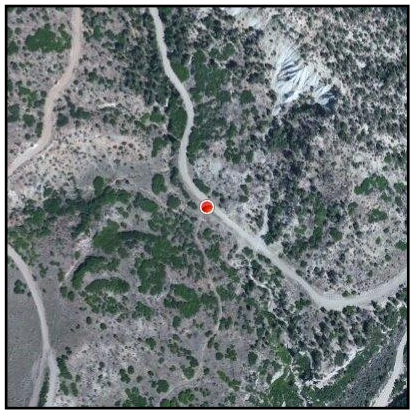
Attributes	
File Name	IMG_20130605_111021.jpg
Title	
Subject	
Latitude	N 39° 23' 04"
Longitude	W 108° 37' 47"
Elevation	6640 ft
Photo Direction	

13 – South at junction of H40 and a route providing access to two producing oil and gas wells. The location of this route is not correct on BLM TMP maps. The routes H46, H47, H49, and H56 do not exist on the ground in the location BLM places them on TMP maps.

Title:

Attributes	
File Name	IMG_20130605_111316.jpg
Title	
Subject	
Latitude	N 39° 22' 52"
Longitude	W 108° 37' 42"
Elevation	6493 ft
Photo Direction	

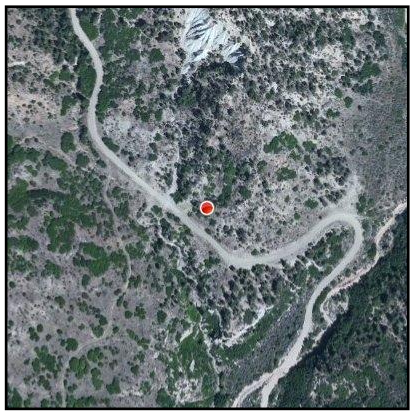
14 – South where the BLM places H46. No route exists here, only a faint path and reclaimed path. This route should be deleted from BLM maps. H46 is not a WIR and should not be cherrystemmed out of the County Line unit.



Title:

Attributes	
File Name	IMG_20130605_111629.jpg
Title	
Subject	
Latitude	N 39° 22' 51"
Longitude	W 108° 37' 38"
Elevation	6358 ft
Photo Direction	

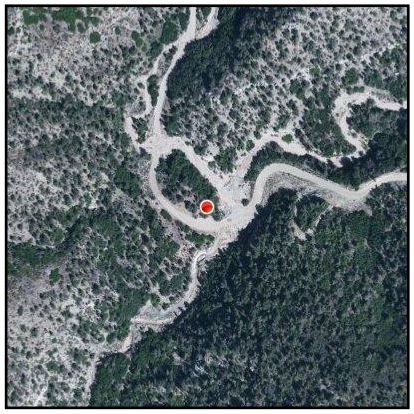
15 – looking south down the canyon in which H40 travels. Notice the extensive screening in this area.



Title:

Attributes	
File Name	IMG_20130605_112245.jpg
Title	
Subject	
Latitude	N 39° 22' 09"
Longitude	W 108° 37' 31"
Elevation	6250 ft
Photo Direction	

16 – looking southwest down H50. H50 is not pasable to vehicles, travels directly down an intermittent wash, and is hardly noticeable from the ground. H50 should be closed to motorized travel.



Title:

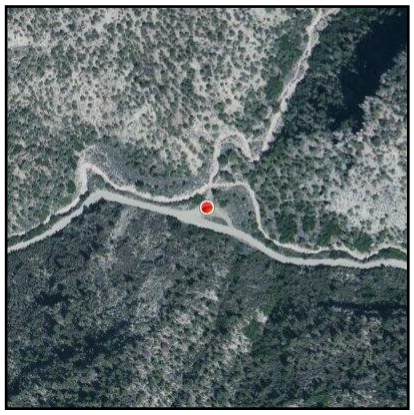
Attributes	
File Name	IMG_20130605_113634.jpg
Title	
Subject	
Latitude	N 39° 21' 44"
Longitude	W 108° 36' 02"
Elevation	6719 ft
Photo Direction	

17 – looking northeast up H52. H52 appears to be a user-created route. The route is very short and serves no purpose. The route is not maintained and does not qualify as a WIR. For TMP purposes, the route should be closed to motorized travel.

Title:

Attributes	
File Name	IMG_20130605_133337.jpg
Title	
Subject	
Latitude	N 39° 21' 02"
Longitude	W 108° 38' 48"
Elevation	5846 ft
Photo Direction	

18 – looking northeast from the southern terminus of I1027/H50. I1027 is a user-created route traveling directly up an intermittent wash. I1027 and H50 do not qualify as WIRs and for TMP purposes should be closed to motorized travel.



Title:

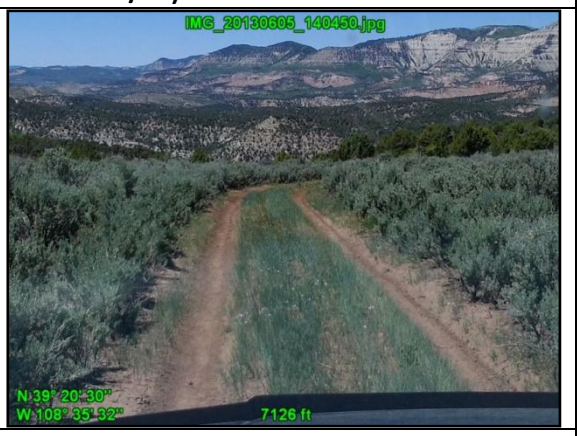
Attributes	
File Name	IMG_20130605_135341.jpg
Title	
Subject	
Latitude	N 39° 20' 45"
Longitude	W 108° 36' 04"
Elevation	7142 ft
Photo Direction	

19 – looking north from Coal Gulch road across the BLM's County Line unit into the BLM's Hunter Canyon unit. This area offers numerous opportunities for primitive recreation and countless places where one might find solitude.

Title:

Attributes	
File Name	IMG_20130605_140450.jpg
Title	
Subject	
Latitude	N 39° 20' 30"
Longitude	W 108° 35' 32"
Elevation	7126 ft
Photo Direction	

20 – looking northwest along I1032. Neither this route, nor the routes that are accessed from this route (I11, I1030, I1034, I1039, I12, I14) are maintained using mechanical means. These routes do not qualify as WIRs and for TMP purposes should be closed to motorized travel beginning at the junction with Coal Gulch Rd (Mesa CR V8/10)



Title:

Attributes	
File Name	IMG_20130605_140855.jpg
Title	
Subject	
Latitude	N 39° 20' 39"
Longitude	W 108° 35' 25"
Elevation	7047 ft
Photo Direction	

21 – looking north along the unmaintained and nearly invisible I11. This route does not qualify as a WIR and should be closed to motorized travel.

Title:

Attributes	
File Name	IMG_20130605_140941.jpg
Title	
Subject	
Latitude	N 39° 20' 39"
Longitude	W 108° 35' 25"
Elevation	7034 ft
Photo Direction	

22 – looking north along I11. The route is overgrown and unmaintained. This area provides outstanding hiking and backpacking opportunities as well as amazing sunset photography opportunities.

Title:

Grand Junction Book Cliffs unit: Cow Ridge

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Cow Ridge unit as an area that could meet the criteria for a Lands with Wilderness Characteristics (LWC). Through spatial data analysis, the BLM identified an area of around 15,700 acres along the east end of Cow Ridge and in 2009 these acres were inventoried by BLM. However, possibly due to the fact that the inventory was completed three years before the existing guidance on conducting wilderness characteristics inventories on BLM lands was completed, this report failed to look at the boundaries of the unit themselves, in order to ensure that these boundaries currently meet the criteria for LWC boundary delineation as laid out in BLM Manual 6310. Because of this oversight, the BLM did not assess the full qualifying area around Cow Ridge, and thus their conclusions as to the area's lack of outstanding opportunities for solitude and primitive and/or unconfined recreation are not based on the actual area that should have been analyzed and are thus incorrect.

During May of 2013, The Wilderness Society visited Cow Ridge to conduct an in-depth, on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified several adjustments that should be made to the BLM's boundaries for the Cow Ridge unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map and photosheet). The result is that the boundaries that the BLM analyzed in 2009 as the Cow Ridge unit are incorrect. In fact, the Cow Ridge unit is not an individual unit, but instead connects to the unit identified in the BLM's draft inventory as the Hunter Canyon unit, which in turn connects to several additional potential LWC units including East Salt Creek. These units together form a unit we are calling The Grand Junction Book Cliffs unit. A map and narrative describing the Grand Junction Book Cliffs unit is included in this report.

Because BLM did not accurately define the true boundaries of the potential LWC unit Cow Ridge, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by

mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the boundaries BLM has proposed for the Cow Ridge unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The Cow Ridge unit, as identified by the BLM, is bounded on its west side by boundaries which do not exist on the ground and/or do not qualify as boundary delineation features according to BLM's own policies. From the north end of the Cow Ridge unit, the BLM's western boundary travels directly up Cow Ridge from the boundary with private lands along Kimball Creek Road (CR202) to the top of Cow Ridge. This boundary follows no existing roads or other boundary delineation features. The BLM's own Travel Management Plan maps show no existing routes of any kind in this area on the north side of Cow Ridge. Because this boundary follows no existing on-the-ground feature, it should be deleted and moved west. This results in the incorporation of all the public lands on the north side of Cow Ridge to the west, joining with the lands included in the BLM's Hunter Canyon unit just west of Myser Gulch.

The BLM's phantom boundary meets BLM routes G26, G333, and G334 at the top of Cow Ridge and roughly follows these routes south off of the ridge to a junction with Garfield County Road 200. However, these routes, although clearly constructed using mechanical means, no longer have public access and do not appear to be maintained using mechanical means to ensure relatively regular and continuous use. C334 in particular, is very overgrown at its junction with CR200 and is impassable to passenger vehicles. These routes does not meet the criteria for WIRs and the boundary that occasionally follows these route should be deleted resulting in the extension of the Cow Ridge unit to the west along the south side of Cow Ridge.

Additional boundary and route comments for the BLM's Cow Ridge unit:

- BLM routes G333, and G334 do not provide access to private land. The eastern ends of BLM route G26 also does not provide access to private lands. G26 only provides access to private lands at its western end where it connects with G67. BLM G333, G334, and the eastern segments of G26 beyond the private land parcel atop Cow Ridge should be closed to motorized use. These routes have no public access and are redundant.

- Routes G322, G323, G331, G324, G332, G330, G325, and G326 all exist in a very small area. These routes have no public access and provide no access to private lands; instead many of them originate from private lands and lead to nowhere in particular. If there is an administrative or permitted use in this area, then one or two of these routes may need to remain open to that use, however leaving all of them open to permitted/authorized use is redundant. These routes should all be closed to motorized travel unless a specific authorized or permitted need is clearly identified.

- G25 is overgrown and serves no purpose. The route has no public access and leads to nowhere in particular. The route should be closed to motorized travel.

- G109, G119, and G117 all travel for short distances north up a small drainage flowing south off of Cow Ridge. G119 may be a remnant access road for an antiquated well pad; this well pad has

been abandoned for nearly 20 years and G119 is nearly completely reclaimed (photo 5). G117 appears to be user-created and is undoubtedly not maintained using mechanical means (photos 1 and 2). These routes should be closed to motorized travel.

- G113, G114, and G115 are all overgrown and sandy and have no known purpose. These routes should be closed to motorized travel.

- West of the most western private parcel atop Cow Ridge, routes G41, G300, G301, G302, and G303 serve no purpose. These routes do not qualify as WIRs for LWC inventory purposes as they are two-track or nearly invisible routes that do not appear to be maintained using mechanical means to ensure relatively regular and continuous use. While G41 does provide access to private property on its eastern ends (via BLM route G67), on its western end it provides no such access. The only way to access this western section of G41 is through private lands and currently no such public access exists. These routes west of the private parcels atop Cow Ridge should be closed to all motorized travel and rehabilitated.

Wilderness Characteristics and the BLM's Wilderness Characteristics Determinations:

Because the boundaries drawn by the BLM for the Cow Ridge unit contained inaccuracies, any assessment of the wilderness characteristics located within the unit are not based on full information. In fact, the Cow Ridge has no qualifying boundary delineation feature separating it from the BLM's adjacent Hunter Canyon unit—a unit that the BLM found to meet the criteria of a Lands with Wilderness Characteristics. Because these two units (along with several others) are actually a single unit, the same wilderness characteristics identified by the BLM in the Hunter Canyon unit also exist in the Cow Ridge unit.

Summary and Recommendation:

The area identified in the BLM's draft inventory as the Cow Ridge unit is defined by boundaries that do not meet the criteria for Wilderness Inventory Roads or other qualifying boundary features. Because of this, the area analyzed in the BLM's draft inventory report is only part of the complete picture for this area. In fact, the area described by the BLM as the Cow Ridge unit is actually contiguous with the Hunter Canyon unit to the west. Because of this, the determinations made by the BLM about the Cow Ridge unit's lack of outstanding opportunities for solitude and primitive and/or unconfined recreation are incorrect. The BLM must re-inventory the entire area that qualifies as a potential lands with wilderness characteristics under current BLM guidance and any determinations made in that inventory as to the unit's boundaries or wilderness characteristics should be fully documented with geotagged photographs, maps, and Route Analysis forms s required by BLM Manual 6310.

Grand Junction Book Cliffs unit: Cow Ridge

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During May of 2013, The Wilderness Society visited Cow Ridge to conduct an in-depth, on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified several adjustments that should be made to the BLM's boundaries for the Cow Ridge unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map and photosheet). The result is that the boundaries that the BLM analyzed in 2009 as the Cow Ridge unit are incorrect. In fact, the Cow Ridge unit is not an individual unit, but instead connects to the unit identified in the BLM's draft inventory as the Hunter Canyon unit, which in turn connects to several additional potential LWC units including East Salt Creek. These units together form a unit we are calling The Grand Junction Book Cliffs unit. A map and narrative describing the Grand Junction Book Cliffs unit is included in this report.

Because BLM did not accurately define the true boundaries of the potential LWC unit Cow Ridge, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by

mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the boundaries BLM has proposed for the Cow Ridge unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The Cow Ridge unit, as identified by the BLM, is bounded on its west side by boundaries which do not exist on the ground and/or do not qualify as boundary delineation features according to BLM's own policies. From the north end of the Cow Ridge unit, the BLM's western boundary travels directly up Cow Ridge from the boundary with private lands along Kimball Creek Road (CR202) to the top of Cow Ridge. This boundary follows no existing roads or other boundary delineation features. The BLM's own Travel Management Plan maps show no existing routes of any kind in this area on the north side of Cow Ridge. Because this boundary follows no existing on-the-ground feature, it should be deleted and moved west. This results in the incorporation of all the public lands on the north side of Cow Ridge to the west, joining with the lands included in the BLM's Hunter Canyon unit just west of Myser Gulch.

The BLM's phantom boundary meets BLM routes G26, G333, and G334 at the top of Cow Ridge and roughly follows these routes south off of the ridge to a junction with Garfield County Road 200. However, these routes, although clearly constructed using mechanical means, no longer have public access and do not appear to be maintained using mechanical means to ensure relatively regular and continuous use. C334 in particular, is very overgrown at its junction with CR200 and is impassable to passenger vehicles. These routes does not meet the criteria for WIRs and the boundary that occasionally follows these route should be deleted resulting in the extension of the Cow Ridge unit to the west along the south side of Cow Ridge.

Additional boundary and route comments for the BLM's Cow Ridge unit:

- BLM routes G333, and G334 do not provide access to private land. The eastern ends of BLM route G26 also does not provide access to private lands. G26 only provides access to private lands at its western end where it connects with G67. BLM G333, G334, and the eastern segments of G26 beyond the private land parcel atop Cow Ridge should be closed to motorized use. These routes have no public access and are redundant.

- Routes G322, G323, G331, G324, G332, G330, G325, and G326 all exist in a very small area. These routes have no public access and provide no access to private lands; instead many of them originate from private lands and lead to nowhere in particular. If there is an administrative or permitted use in this area, then one or two of these routes may need to remain open to that use, however leaving all of them open to permitted/authorized use is redundant. These routes should all be closed to motorized travel unless a specific authorized or permitted need is clearly identified.

- G25 is overgrown and serves no purpose. The route has no public access and leads to nowhere in particular. The route should be closed to motorized travel.

- G109, G119, and G117 all travel for short distances north up a small drainage flowing south off of Cow Ridge. G119 may be a remnant access road for an antiquated well pad; this well pad has

been abandoned for nearly 20 years and G119 is nearly completely reclaimed (photo 5). G117 appears to be user-created and is undoubtedly not maintained using mechanical means (photos 1 and 2). These routes should be closed to motorized travel.

- G113, G114, and G115 are all overgrown and sandy and have no known purpose. These routes should be closed to motorized travel.

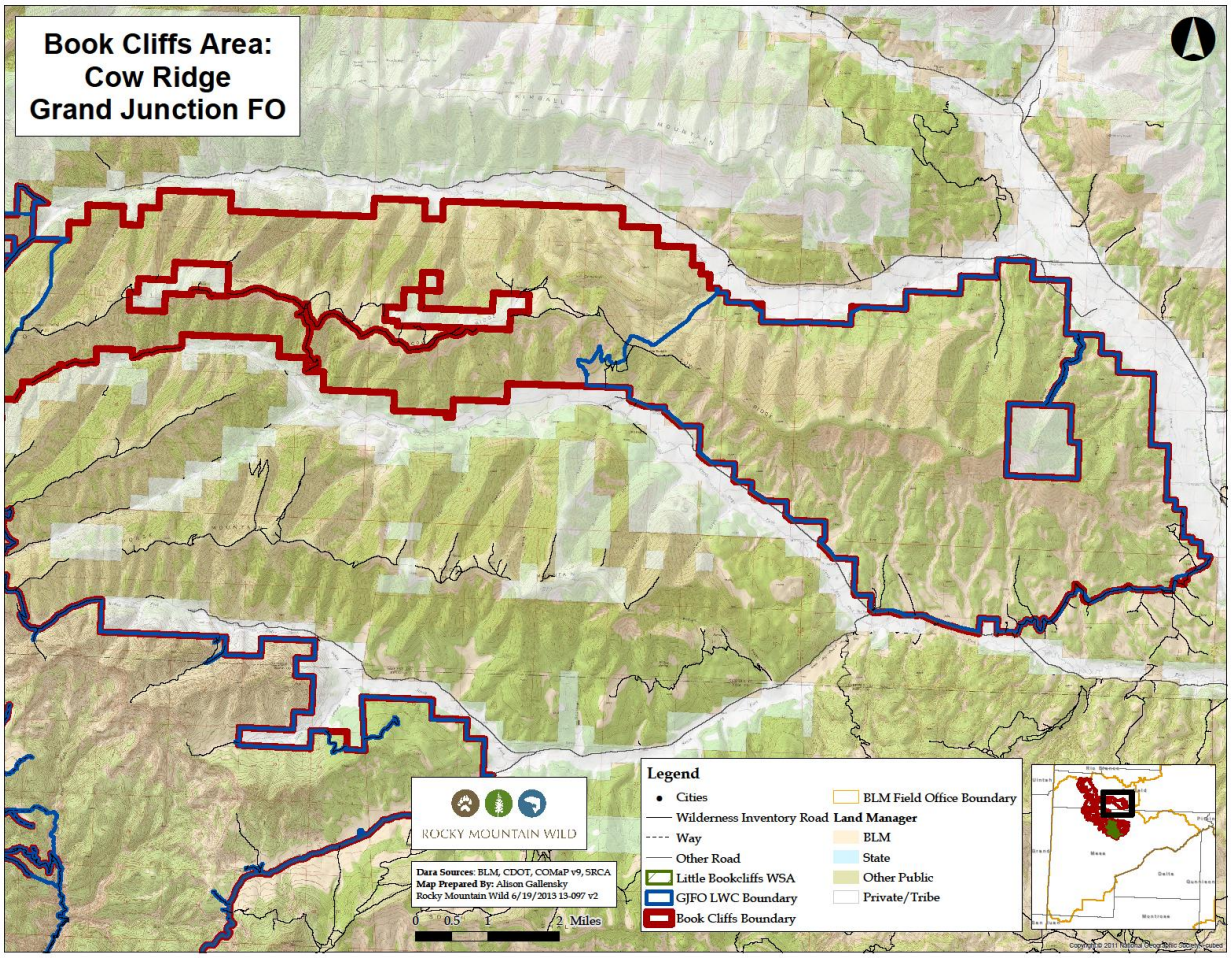
- West of the most western private parcel atop Cow Ridge, routes G41, G300, G301, G302, and G303 serve no purpose. These routes do not qualify as WIRs for LWC inventory purposes as they are two-track or nearly invisible routes that do not appear to be maintained using mechanical means to ensure relatively regular and continuous use. While G41 does provide access to private property on its eastern ends (via BLM route G67), on its western end it provides no such access. The only way to access this western section of G41 is through private lands and currently no such public access exists. These routes west of the private parcels atop Cow Ridge should be closed to all motorized travel and rehabilitated.

Wilderness Characteristics and the BLM's Wilderness Characteristics Determinations:

Because the boundaries drawn by the BLM for the Cow Ridge unit contained inaccuracies, any assessment of the wilderness characteristics located within the unit are not based on full information. In fact, the Cow Ridge has no qualifying boundary delineation feature separating it from the BLM's adjacent Hunter Canyon unit—a unit that the BLM found to meet the criteria of a Lands with Wilderness Characteristics. Because these two units (along with several others) are actually a single unit, the same wilderness characteristics identified by the BLM in the Hunter Canyon unit also exist in the Cow Ridge unit.

Summary and Recommendation:

The area identified in the BLM's draft inventory as the Cow Ridge unit is defined by boundaries that do not meet the criteria for Wilderness Inventory Roads or other qualifying boundary features. Because of this, the area analyzed in the BLM's draft inventory report is only part of the complete picture for this area. In fact, the area described by the BLM as the Cow Ridge unit is actually contiguous with the Hunter Canyon unit to the west. Because of this, the determinations made by the BLM about the Cow Ridge unit's lack of outstanding opportunities for solitude and primitive and/or unconfined recreation are incorrect. The BLM must re-inventory the entire area that qualifies as a potential lands with wilderness characteristics under current BLM guidance and any determinations made in that inventory as to the unit's boundaries or wilderness characteristics should be fully documented with geotagged photographs, maps, and Route Analysis forms s required by BLM Manual 6310.


Book Cliffs Area:
Cow Ridge
Grand Junction FO
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/19/2013 13-097 v2
0 0.5 1 2 Miles
Legend
Cities
Wilderness Inventory Road
Way
Other Road
Little Bookcliffs WSA
GJFO LWC Boundary
Book Cliffs Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe

Grand Junction Book Cliffs unit: Cow Ridge Photopoints

The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph

Overview Map

Attributes	
File Name	IMG_1239.JPG
Title	
Subject	
Latitude	N 39° 23' 25"
Longitude	W 108° 19' 22"
Elevation	5732 ft
Photo Direction	0° N

1 – northwest up G117. This route is not maintained using mechanical means.

Title:

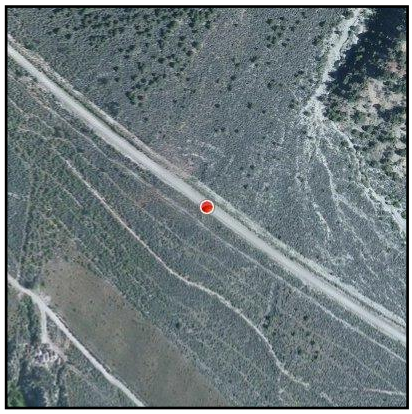
Attributes	
File Name	IMG_1240.JPG
Title	
Subject	
Latitude	N 39° 23' 23"
Longitude	W 108° 19' 22"
Elevation	5741 ft
Photo Direction	209° SSW

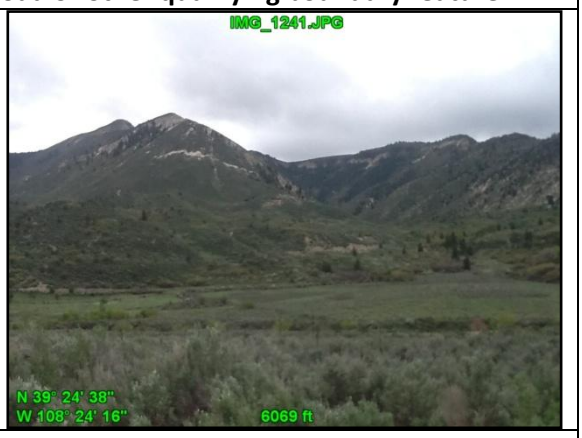
2 – south along G117. This route is not maintained and appears to be user-created.

Title:

Attributes	
File Name	IMG_1241.JPG
Title	
Subject	
Latitude	N 39° 24' 38"
Longitude	W 108° 24' 16"
Elevation	6069 ft
Photo Direction	303° WNW

3 – Looking at the BLM's Horse Mountain unit. The BLM's boundary follows this ridge where there exists no road or other qualifying boundary feature.

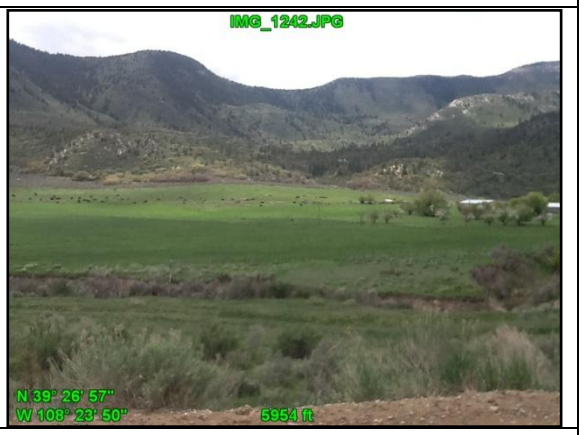




Title:

Attributes	
File Name	IMG_1242.JPG
Title	
Subject	
Latitude	N 39° 26' 57"
Longitude	W 108° 23' 50"
Elevation	5954 ft
Photo Direction	301° WNW

4 – looking south at Cow Ridge from Kimball Creek Rd (CR202). The BLM's boundary is drawn directly down the ridge in the background towards the viewer. The boundary follows no roads or other defining features at all. The boundary should be deleted and all the public lands west of this point along Cow Ridge included in the LWC unit.



Title:

Attributes	
File Name	IMG_0302.jpg
Title	
Subject	
Latitude	N 39° 23' 17"
Longitude	W 108° 19' 23"
Elevation	
Photo Direction	

5 – view northwest over upper G119 towards Cow Ridge. The route is overgrown with sagebrush and impassable to vehicles.

Title:

Attributes	
File Name	cowridge.jpg
Title	
Subject	
Latitude	N 39° 23' 25"
Longitude	W 108° 19' 22"
Elevation	
Photo Direction	

6 – Cow Ridge provides outstanding hiking among the pinyon and juniper-covered rolling hills below the steep white cliffs. Solitude is easily found as this area is lightly visited.

Title:

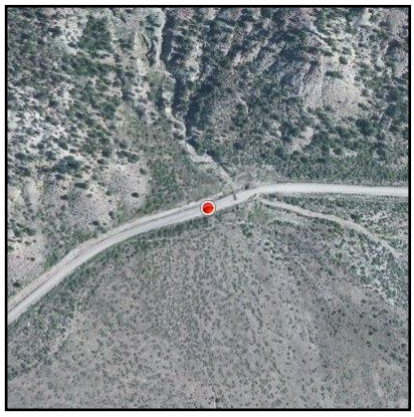
Attributes	
File Name	IMG_0305.jpg
Title	
Subject	
Latitude	N 39° 23' 25"
Longitude	W 108° 19' 22"
Elevation	
Photo Direction	

7 – The firm red soil allows for easy hiking and horseback riding through the scattered juniper. The views allow for great photography, particularly as the western sun illuminates the multi-hued cliffs of Cow Ridge at sunset.

Title:

Attributes	
File Name	IMG_0312.jpg
Title	
Subject	
Latitude	N 39° 27' 12"
Longitude	W 108° 21' 15"
Elevation	5782 ft
Photo Direction	

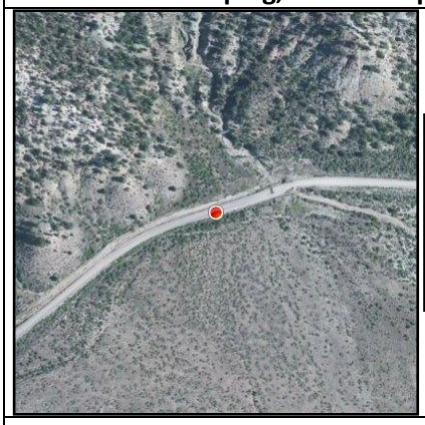
8 – looking south from CR202. The north side of Cow Ridge contains numerous small drainages which provide important big game habitat. Outstanding primitive backcountry hunting opportunities exist in this area.



Title:

Attributes	
File Name	ridge.jpg
Title	
Subject	
Latitude	N 39° 27' 12"
Longitude	W 108° 21' 16"
Elevation	5781 ft
Photo Direction	

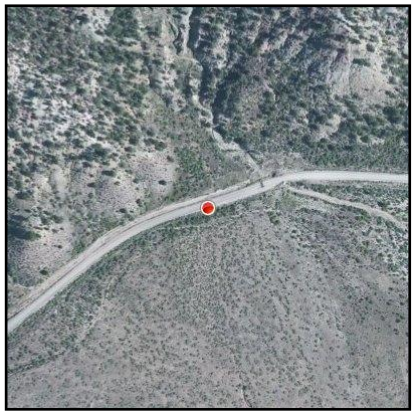
9 – South from CR202. A look at the vegetation and topography of the northern slopes of Cow Ridge. The benches below Cow Ridge provide great hiking, camping, and other primitve recreation opportunities.



Title:

Attributes	
File Name	IMG_0317.jpg
Title	
Subject	
Latitude	N 39° 27' 12"
Longitude	W 108° 21' 16"
Elevation	5792 ft
Photo Direction	

10 – a hidden hollow along the north side of Cow Ridge. Because of the difficulty of access from this side of the ridge, anyone achieving access to this area will undoubtedly find outstanding solitude.



Title:

East Demaree

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the East Demaree unit as an area that could meet the criteria for a Lands with Wilderness Characteristics (LWC). Through spatial data analysis, the BLM identified an area of around 4,800 acres adjacent and contiguous with the Demaree Canyon Wilderness Study Area, which is currently being managed by the BLM to protect its wilderness characteristics. In 2009—three years prior to the release of updated BLM Manual 6310 outlining new procedures and policies for inventorying wilderness characteristics on BLM lands—the area was inventoried by BLM. The BLM's inventory found the unit to contain apparent naturalness and outstanding opportunities for solitude; however, the report failed to find outstanding opportunities for primitive or unconfined recreation in the unit, despite the fact that the unit is contiguous with an existing Wilderness Study Area (WSA) and thus should inherit any wilderness characteristics found by the BLM within that WSA. And while the BLM's narrative describes a lack of outstanding opportunities for primitive and/or unconfined recreation ("the opportunities are not considered to be outstanding in nature" (Draft Inventory, p.60), the "Summary of Findings and Conclusion" at the end of the East Demaree unit report concludes that the area *does* offer these outstanding opportunities (Draft Inventory, p.60). The rationale or explanation for this inconsistency in the report is not explained anywhere else in the document.

Despite the inconsistencies in the BLM's findings, the area does lie contiguous with an existing WSA and contains apparent naturalness, and so the outstanding opportunities for solitude and primitive and unconfined recreation present in the Demaree Canyon WSA obviously exist in this extension of that unit as well.

During May of 2013, The Wilderness Society visited the East Demaree unit to conduct an in-depth, on-the-ground field inventory of lands contiguous with the Demaree Canyon WSA. Our goal was to assess whether the BLM's draft inventory boundaries met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified several minor adjustments that should be made to the BLM's boundaries for the East Demaree unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map and photosheet). The result is that several routes that were cherrystemmed out of the East Demaree unit in the BLM's 2009 inventory of the area do not meet the criteria for WIRs laid out in 2012 in the BLM's revised Manual 6310.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the routes that BLM has cherrystemmed out of the East Demaree unit do not meet the above criteria for a Wilderness Inventory Road and thus should be deleted. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

- The BLM's inventory of the East Demaree unit states, "Currently, no BLM system roads exist within the unit although there are approximately 2.5 miles of users created [*sic*] routes within the unit. No routes are receiving any maintenance." (Draft Inventory, p. 59) Because all of the routes within the unit are user-created and do not receive any maintenance using mechanical means, these routes do not qualify as WIRs and should not be cherrystemmed out of the unit.

- J12 (photo 2) is a user-created route that travels through several low-lying and muddy areas. This route is easily rutted and resources easily damaged by motorized vehicles. This route should be closed to motorized travel to protect the wilderness characteristics of the area.

- J202 (photo 1) is a user-created route which encroaches into the Demaree Canyon WSA. Motorized users are pushing this route further and further into the WSA, causing resource damage. This route should be closed to motorized travel and rehabilitated to prevent further degradation of the wilderness characteristics of the WSA.

- J290 and J291 are almost entirely invisible from the ground. These routes should be closed to motorized travel.

- J285 is very difficult to locate on the ground. The route is basically completely reclaimed by natural forces and should be officially closed to motorized travel.

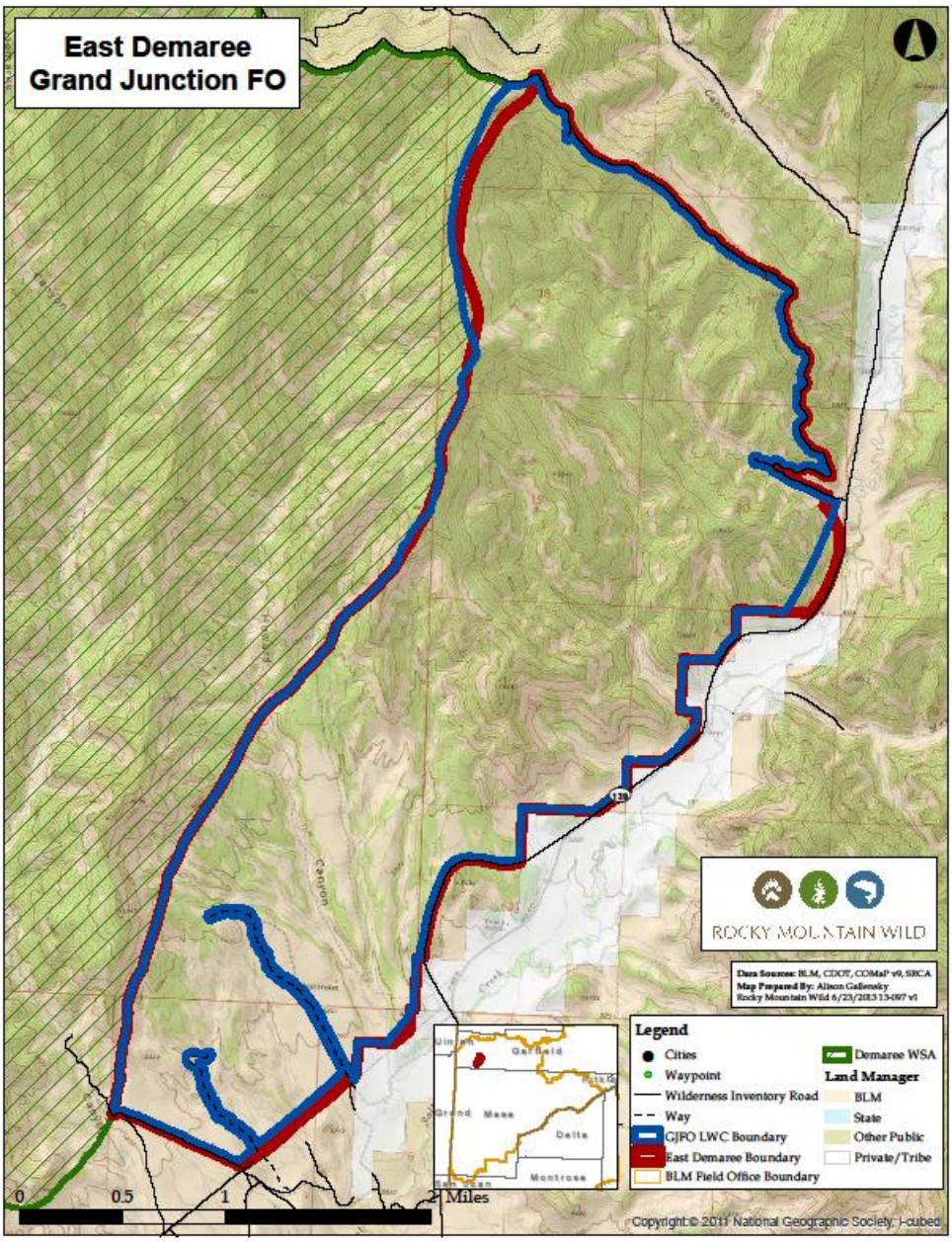
- J288 once led south from J4 to a well pad. This wells here date from the late 1950s and their former access route (J288) is entirely reclaimed. J288 should be closed to motorized travel.

- Routes J275 and J276 begin at private property along Colorado Highway 139 and lead to a number of additional overgrown and reclaimed routes including J282, J274, J273, and J277. These routes have no public access, are not maintained, and are almost entirely indiscernible from the ground. These routes should be closed to motorized travel and rehabilitated where necessary to protect the wilderness characteristics present in the East Demaree unit.

<u>Summary and Recommendation:</u>

The area identified in the BLM's draft inventory as the East Demaree unit is contiguous with the Demaree Canyon WSA as no road or other qualifying feature separates the two areas. The East Demaree unit contains the same wilderness characteristics as those found in the WSA. Several user-created routes that the BLM has cherrystemmed out of the East Demaree unit do not meet the criteria

for Wilderness Inventory Roads; these routes should be left within the unit and closed to motorized travel. The wilderness characteristics of the East Demaree unit should be protected by the BLM as an extension of the Demaree Canyon WSA.



East Demaree (Demaree Canyon WSA contiguous) Photopoints

The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph.

Overview Map

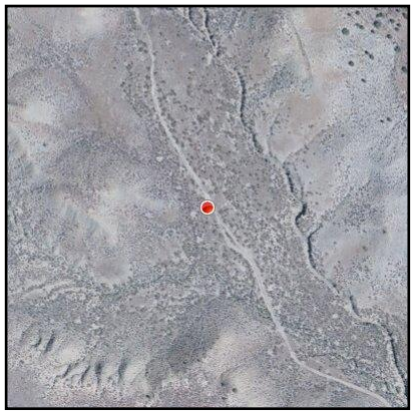
Attributes	
File Name	IMG_1198.JPG
Title	
Subject	
Latitude	N 39° 23' 43"
Longitude	W 108° 50' 41"
Elevation	5266 ft
Photo Direction	0° N

1 – looking northwest up J202. J202 is a user-created route which encroaches on the WSA (a carsonite post denoting the WSA boundary is visible in the photograph). J202 should be closed and rehabilitated to prevent motorized trespass into the Demaree Canyon WSA.

Title:

Attributes	
File Name	IMG_1200.JPG
Title	
Subject	
Latitude	N 39° 23' 49"
Longitude	W 108° 50' 11"
Elevation	5164 ft
Photo Direction	0° N

2 – looking north along BLM route J12. This route shows no signs of construction in this area and is not maintained. The route travels through several low-lying and muddy areas and is easily damaged by motorized travel. This route does not qualify as a WIR and the BLM's cherrystem should be deleted from the LWC unit.



Title:

Attributes	
File Name	IMG_1201.JPG
Title	
Subject	
Latitude	N 39° 24' 01"
Longitude	W 108° 50' 12"
Elevation	5174 ft
Photo Direction	0° N

3 – J292 is a user-created route. This photo shows that no blading has occurred (the route travels over the slight rise without any signs of cast off on the sides of the route)

Title:

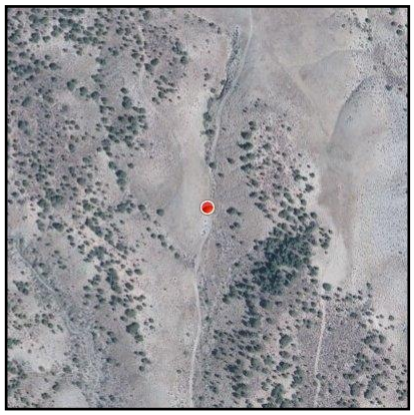
Attributes	
File Name	IMG_1202.JPG
Title	
Subject	
Latitude	N 39° 24' 08"
Longitude	W 108° 50' 08"
Elevation	5185 ft
Photo Direction	0° N

4 – a small water collection pond was attempted here. The pond shows signs of construction, however it currently holds no water and does not appear to be functional.

Title:

Attributes	
File Name	IMG_1203.JPG
Title	
Subject	
Latitude	N 39° 24' 17"
Longitude	W 108° 50' 08"
Elevation	5279 ft
Photo Direction	0° N

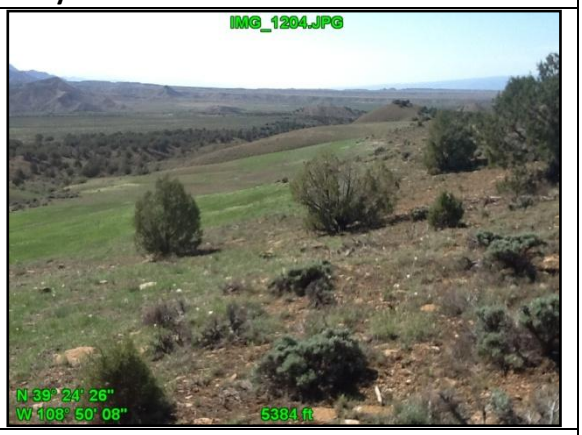
5 – North. J292 continues as a user-created route. No evidence of blading or other maintenance.



Title:

Attributes	
File Name	IMG_1204.JPG
Title	
Subject	
Latitude	N 39° 24' 26"
Longitude	W 108° 50' 08"
Elevation	5384 ft
Photo Direction	0° N

6 – looking south over J284, J285, J286, and J292. These routes do not qualify as WIRs and are not substantially noticeable from within the unit.



Title:

Attributes	
File Name	IMG_1206.JPG
Title	
Subject	
Latitude	N 39° 24' 26"
Longitude	W 108° 49' 55"
Elevation	5270 ft
Photo Direction	358° N

7 – north along J4. This route is neither constructed nor maintained using mechanical means. The route does not qualify as a WIR and should not be cherrystemmed out of the LWC unit. For TMP purposes the route should be closed to motorized travel.

Title:

Attributes	
File Name	IMG_1207.JPG
Title	
Subject	
Latitude	N 39° 24' 28"
Longitude	W 108° 49' 56"
Elevation	5285 ft
Photo Direction	0° N

8 – looking north further up J4. This route is user-created and is not maintained using mechanical means.

Title:

Attributes	
File Name	IMG_1208.JPG
Title	
Subject	
Latitude	N 39° 24' 19"
Longitude	W 108° 49' 47"
Elevation	5262 ft
Photo Direction	0° N

9 – north. An abandoned well pad along J4 is substantially unnoticeable and almost entirely reclaimed.

Title:

Attributes	
File Name	IMG_1209.JPG
Title	
Subject	
Latitude	N 39° 24' 15"
Longitude	W 108° 49' 40"
Elevation	5207 ft
Photo Direction	0° N

10 – looking north across the East Demaree unit. The flat plains are covered in large and dense sagebrush and are cut by numerous arroyos. Opportunities for primitive recreation in this area are oustanding.

Title:

Attributes	
File Name	IMG_1210.JPG
Title	
Subject	
Latitude	N 39° 24' 20"
Longitude	W 108° 49' 32"
Elevation	5207 ft
Photo Direction	0° N

11 – Looking northeast at an abandoned and almost entirely reclaimed well pad along J264. J264 is not maintained and should be closed to motorized travel.

Title:

Attributes	
File Name	IMG_1212.JPG
Title	
Subject	
Latitude	N 39° 24' 30"
Longitude	W 108° 49' 42"
Elevation	5282 ft
Photo Direction	0° N

12 – northwest along J264. A small cut exists in this area, possibly made during the construction of a small water impoundment structure just northwest of this point.

Title:

Attributes	
File Name	IMG_1213.JPG
Title	
Subject	
Latitude	N 39° 24' 35"
Longitude	W 108° 49' 44"
Elevation	5245 ft
Photo Direction	178° S

13 – East. The face of the impoundment structure between J265 and J268. J265 is an unmaintained route visible in this photograph.

Title:

Attributes	
File Name	IMG_1215.JPG
Title	
Subject	
Latitude	N 39° 24' 53"
Longitude	W 108° 50' 16"
Elevation	5459 ft
Photo Direction	0° N

14 – northwest along J268. J268 was likely once used to access the well pad at the northwest end of the route. However, this well is so old that it does not appear on the Colorado Oil and Gas Conservation Commission's well database and appears to be dry and abandoned. J268 is overgrown and impassable to most vehicles. The route should be closed to motorized travel.

Title:

Attributes	
File Name	IMG_1216.JPG
Title	
Subject	
Latitude	N 39° 24' 58"
Longitude	W 108° 50' 21"
Elevation	5643 ft
Photo Direction	0° N

15 – the old dry and abandoned well at the top of J268 with views south across the East Demaree unit.

Title:

Attributes	
File Name	IMG_1217.JPG
Title	
Subject	
Latitude	N 39° 24' 25"
Longitude	W 108° 49' 56"
Elevation	5282 ft
Photo Direction	0° N

16 – Northwest along J284. J284 shows no evidence of construction and is currently unmaintained. The route does not qualify as a WIR and should not be cherrystemmed out of the unit. For TMP purposes this route should be closed to motorized travel.

Title:

Attributes	
File Name	IMG_1218.JPG
Title	
Subject	
Latitude	N 39° 23' 28"
Longitude	W 108° 49' 34"
Elevation	5121 ft
Photo Direction	0° N

17 – J174 oustide of the LWC unit. J174 travels through several low-lying areas and is easily damaged by vehicle travel.

Title:

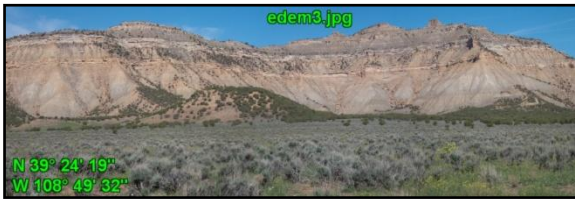
Attributes	
File Name	edembig.jpg
Title	
Subject	
Latitude	N 39° 24' 20"
Longitude	W 108° 49' 31"
Elevation	
Photo Direction	

18 – Looking west across the East Demaree unit towards Demaree Canyon WSA. The sagebrush is large enough to provide screening between individual visitors and the primitive recreation opportunities such as hiking, horseback riding, photography, and wildlife viewing are outstanding here.

Title:

Attributes	
File Name	edem3.jpg
Title	
Subject	
Latitude	N 39° 24' 19"
Longitude	W 108° 49' 32"
Elevation	
Photo Direction	

19 – another view of the cliffs of the Demaree Canyon WSA.



Title:

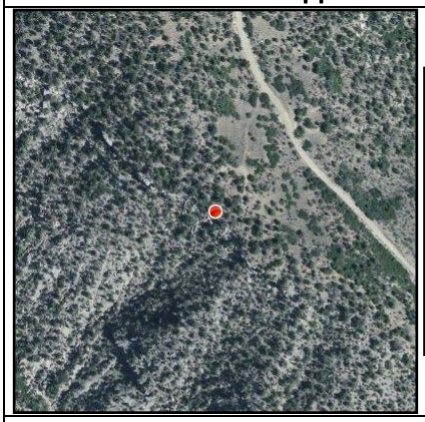
Attributes	
File Name	oustandingsolitude3.jpg
Title	
Subject	
Latitude	N 39° 24' 58"
Longitude	W 108° 50' 20"
Elevation	5665 ft
Photo Direction	

20 – looking north across the length of the East Demaree LWC unit. The cliffs and canyons in the background provide outstanding primitive recreational opportunities and offer complete solitude for anyone willing to venture into them.

Title:

Attributes	
File Name	demareewsa.jpg
Title	
Subject	
Latitude	N 39° 27' 54"
Longitude	W 108° 48' 28"
Elevation	6973 ft
Photo Direction	

21 – looking south down into the northern reaches of the East Demaree unit.. This canyon is rarely visited and provides outstanding solitude and primitive recreation opportunities, especially backcountry hunting.



Title:

Grand Junction Book Cliffs unit: East Salt Creek

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the East Salt Creek unit as an area that could meet the criteria for lands with wilderness characteristics. Through spatial data analysis, the BLM identified an area of approximately 18,300 acres around the heads of East Salt and Big Wash creeks as a potential LWC and in 2011--prior to the release in 2012 of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands—these acres were inventoried by BLM. The result of this inventory is that BLM found 17,000 acres of the East Salt Creek unit that meets the criteria for size, naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive recreation and unconfined recreation.

During May and June of 2013, The Wilderness Society visited East Salt Creek to conduct an on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries for the unit met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified several adjustments that should be made to the BLM's boundaries for the East Salt Creek unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map). (Photos of some of these boundary errors are included in the narratives for the adjacent and contiguous units of Barrel Spring and Hunter Canyon.) The result is that the East Salt Creek unit is not an individual unit, but instead connects to the units identified in the BLM's draft inventory as the Barrel Spring and Hunter Canyon units—these units, along with several others in the area to which they in turn connect, form a unit we are calling The Grand Junction Book Cliffs unit. A map of the Grand Junction Book Cliffs unit is included elsewhere in this report.

Although we agree with the BLM's findings that the East Salt Creek unit has outstanding wilderness characteristics, the area defined and analyzed in that assessment is incorrect. Without identifying the true boundaries of a potential LWC unit as defined by Manual 6310, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by

mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the boundaries BLM has proposed for the East Salt Creek unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The East Salt Creek unit, as defined by the BLM, is separated from the Barrel Spring unit on its northern end along Long Point and Corral Canyon by routes C19 and C30. C19 is gated and locked at its northern end near Pike Ridge and access to C19 is blocked by gates at its southern end in East Salt Creek. Both C19 and C30 appear to be two-track routes that are unmaintained using mechanical means to ensure regular and continuous use. This boundary does not qualify as a WIR and should be deleted which causes both the East Salt Creek and Barrel Spring unit to be combined into one.

On the southern boundary of the unit, the BLM uses routes G13 and H17 as the dividing boundary between the East Salt Creek unit and the adjacent Hunter Canyon unit. These two-track routes have no public motorized access and are not mechanically maintained. These routes do not qualify as WIRs and should be deleted, resulting in the combination of the East Salt Creek and Hunter Canyon units.

Additional boundary and route comments for the BLM's East Salt Creek unit:

- Numerous routes originate from private property atop Long Point. These routes—including C111, C113, C19, C110, C26, C29, and C12—not only do not qualify as WIRs because of their unmaintained nature, but they provide no public benefit as access is blocked by locked gates on private land atop Long Point. Similarly, the routes C38, C108, C114, C32, C30, C31, C101, C104, C105, C107, C150, are also sandwiched between private property and access is blocked by locked gates below along East Salt Creek. None of these routes provide access to private property as access to the private parcels is obtained from the north from Garfield County Roads 256 and 239 and from the south from the gated road along East Salt Creek. These routes should be closed to all motorized travel and rehabilitated to ensure the protection of the wilderness characteristics present in the East Salt Creek unit.

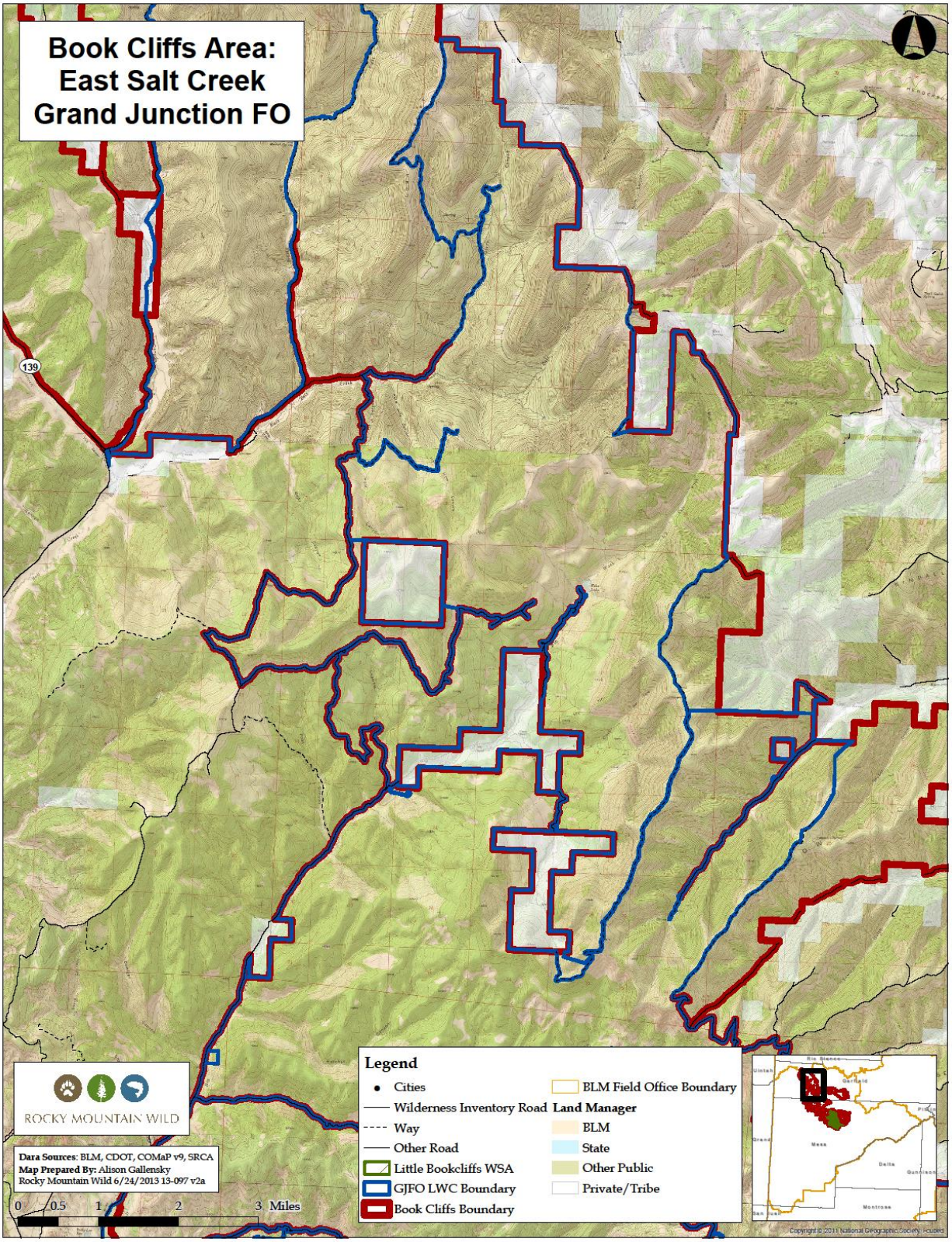
- C44 travels southwest along the ridge separating Big Salt Wash from East Salt Creek. This route is entirely overgrown and reclaimed and is impassable to most vehicles. The route should be closed to motorized travel and completely rehabilitated.

- G13 does not qualify as a Wilderness Inventory Road. The route is a two-track in places and overgrown and nearly invisible in others. The route has no public access from either end. This route should be closed to motorized travel and completely rehabilitated to protect the wilderness characteristics of both the East Salt Creek and Hunter Canyon units.

<u>Summary and Recommendation:</u>

The BLM determined in their draft inventory of potential lands with wilderness characteristics that the area analyzed by BLM as the East Salt Creek unit contains outstanding wilderness characteristics and thus qualifies for protection as a Lands with Wilderness Characteristics. However, as described throughout this document, the East Salt Creek unit analyzed by the BLM is conscribed by boundaries

that do not meet the criteria for boundary delineation as defined in the BLM's own policies. Although we agree that the area does in fact meet the criteria for a Lands with Wilderness Characteristics, the full acreage of the unit has not be analyzed or discussed. The BLM's draft inventory for the East Salt Creek unit contains no Route Analysis forms or other documentation explaining why they drew the boundaries in the way they did, and the only photographs provided in the report (3 photographs in total) detail the topography and vegetation of the East Salt Creek drainage, but do not show any routes or roads that would further illuminate why certain areas were used as boundaries and others were not. The BLM should be re-inventoried as part of the larger Grand Junction Book Cliffs unit and any determinations made as to the wilderness characteristics found or not found therein should be documented with geotagged photographs, maps, and route analysis forms as required by BLM Manual 6310.


Book Cliffs Area:
East Salt Creek
Grand Junction FO
139
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/24/2013 13-097 v2a
0 0.5 1 2 3 Miles
Legend
Cities
Wilderness Inventory Road
Way
Other Road
Little Bookcliffs WSA
GJFO LWC Boundary
Book Cliffs Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
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Granite Creek

Summary and Wilderness Characteristics Determinations:

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Granite Creek unit as an area that could meet the criteria for lands with wilderness characteristics. Granite Creek has long been a Citizen Proposed Wilderness Area, included in Rep. Diana DeGette's Colorado Wilderness Act (to be reintroduced in June 2013). BLM identified an area of 14,048 acres based on a prior 1979 inventory and the CWP —prior to the release of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands—these acres were reinventoried by BLM. The result of this inventory was that BLM found the Granite Creek unit to meet the size and naturalness criteria; however, the contractor hired by BLM to conduct the inventory was unable to find outstanding opportunities for solitude or primitive and/or unconfined recreation. Only a single photograph, and no waypoint, or Road Analysis form is included in the draft inventory report for this area to supplement the BLM's claims as to the area's failure to meet the criteria for consideration as a Lands with Wilderness Characteristics. The inventory narrative does not mention an actual visit to the unit by the contractor, so we are doubtful that the Granite Creek unit was actually visited in person by the contractor hired to conduct the inventory of this unit and as such the inventory is incomplete, and should not be used as the basis for management decisions for this area.

The BLM's draft inventory found that the Granite Creek unit did not contain outstanding opportunities for solitude, citing arguments based on the open nature of the unit, low vegetative screening and route in the bottom of the canyon. However, BLM acknowledges in the existing recreation uses part of the same report that visitation is low, so the probability of encountering others is relatively low. So an argument that either topography or vegetation is a barrier to solitude is without basis if visitation is low and you are unlikely to encounter anyone in the first place. In fact, because of the distance and difficulty of access anyone who achieves access to this unit will experience profound and total solitude. Visitation to this unit is very, very low and thus opportunities for solitude are outstanding and easily found once inside the unit.

The BLM inventory quotes CEC's credible statement of primitive recreation and then dismisses it with one sentence about how the backpacking opportunities are short and most recreation would be motorized. However, BLM fails to explain why this would preclude opportunities for primitive recreation, and is a subjective value statement.

Travel Management Comment:

Generally we support the Alternative C route designation for Granite Creek. U75 through the canyon bottom should be closed to protect primitive recreation and solitude opportunities. Additionally, U665 and U197 ATV routes should be closed to protect the wilderness character of this unit.

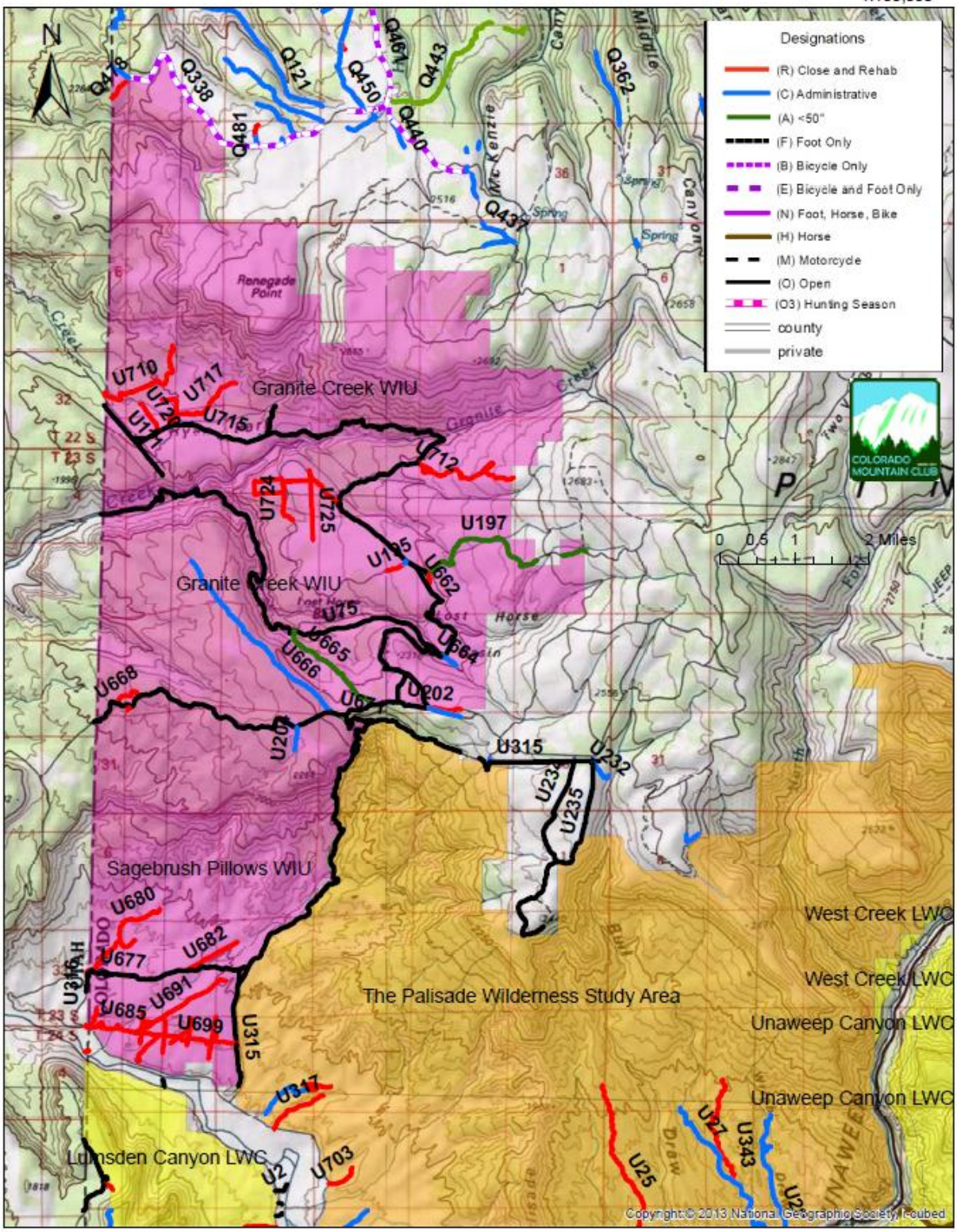
Summary and Recommendation:

The Granite Creek unit not only meets the criteria for size and naturalness as recognized by the BLM, but also possesses outstanding opportunities for solitude and primitive recreation. Because the unit is so difficult to easily access, anybody who makes their way into the unit will undoubtedly find absolute solitude. In addition, the isolation of the unit and the difficulty of access, combined with the deep

canyon walls and Granite Creek that splits the unit—provide outstanding primitive recreational opportunities, especially backcountry fishing. The Granite Creek unit should be re-inventoried and any determinations made as to the wilderness characteristics found or not found therein should be documented with geotagged photographs, maps with waypoints, and route analysis forms (none of which appear in the BLM's draft inventory for this unit) as required by BLM Manual 6310.

Granite Creek & Sagebruch Pillows Wilderness Inventory Units + Alt B Travel Routes

1:100,000



Grand Junction Book Cliffs unit: Horse Mountain

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Horse Mountain unit as an area that could meet the criteria for a Lands with Wilderness Characteristics (LWC). Through spatial data analysis, the BLM identified an area of around 10,300 acres along the east end of Horse Mountain and in 2011 these acres were inventoried by BLM. However, possibly due to the fact that the inventory was completed prior to the 2012 release of updated guidance on conducting wilderness characteristics inventories on BLM lands (BLM Manual 6310), the inventory failed to look at the boundaries of the unit themselves, in order to ensure that these boundaries currently meet the criteria for LWC boundary delineation as laid out in BLM Manual 6310. Because of this oversight, the BLM did not assess the full qualifying area around Horse Mountain (which in fact includes not only the southern aspects of Horse Mountain that were inventoried by BLM but also the northern aspects that were not inventoried) and thus their conclusions as to the area's lack of outstanding opportunities for solitude and primitive and/or unconfined recreation are not based on the actual area that should have been analyzed. Because BLM only looked at around half of the qualifying area, the conclusions made about the area's wilderness characteristics are incorrect.

During May of 2013, The Wilderness Society visited Horse Mountain to conduct an on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified one major adjustment that should be made to the BLM's boundaries for the Horse Mountain unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map and photosheet). The result is that the boundaries that the BLM analyzed in 2011 as the Horse Mountain unit are incorrect. In fact, the contiguous body of roadless acreage includes not only the southern half of Horse Mountain, but the north half above North Dry Fork as well.

Because BLM did not accurately define the true boundaries of the potential LWC unit Horse Mountain, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by

mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Some of the boundaries BLM has proposed for the Horse Mountain unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The Horse Mountain unit, as identified by the BLM, is bounded on its north side by routes and private property parcels atop Horse Mountain. However, based on a reading of the BLM's draft inventory for this area, it appears these boundary routes were not inventoried to determine whether or not they meet the criteria for WIRs. Not a single Route Analysis form for any of these routes is included in the report (in fact, despite the thousands of miles of routes and roads within and around the LWC units in the Grand Junction Field Office, only 3 Route Analysis forms are included in the BLM's draft inventory report). Additionally, a boundary is drawn to create the northern boundary atop Horse Mountain which corresponds to no existing route or other qualifying feature on the ground (photo 3 on the Cow Ridge photopoints page included in this report). This boundary, beginning at the end of route G45 and connecting to private property in Sawmill Gulch, should be deleted as it doesn't meet the criteria for boundary delineation outlined in BLM Manual 6310; the boundary should be moved to qualifying features which in this case are the private land boundaries on the north side of Horse Mountain and along North Dry Fork creek. The resulting parcel contains all the public lands on both the north and south sides of Horse Mountain as far west as the summit ridge between Middle Dry Fork and McKay Fork Dry Fork Creek.

Additional boundary and route comments for the BLM's Horse Mountain unit:

- The BLM's draft inventory cherrystems the routes G142 and G148 (as well as the short spur roads coming off of these routes including G154, G158, G147, G150, G146, and G144) out of the Horse Mountain unit. The access route for all of these connected routes is G142. G142 begins from private property along Mesa County Road X 5/10. Although the routes begins as a constructed and possibly maintained route very near the private property boundary (see photograph in BLM draft inventory, p.81) the route quickly deteriorates as it switchbacks up the south and west ridges above Pedigo Gulch. After the route crosses the arroyo at the bottom of Pedigo Gulch, the route becomes impassable to passenger vehicles. Beyond the switchbacks and as soon as the route meets the route identified by the BLM as G148, the route is completely reclaimed and impassable to all motorized vehicles. Neither G142 nor any of the associated routes listed above are maintained. These routes do not qualify as WIRs and should not be cherrystemmed out of the unit. They are practically invisible from the ground. For Travel Management (TMP) purposes, these routes should be officially closed to motorized travel and rehabilitated where they haven't already been reclaimed naturally.

- G45, beyond the private parcel sitting directly atop eastern Horse Mountain (Dry Fork highpoint 8517') is not maintained using mechanical means. The route provides no public benefit and is blocked from access by private property. The two-track route is overgrown with sagebrush and other vegetation and does not meet the criteria for a WIR. This portion of G45 should be closed to motorized traffic and the BLM's boundary for the Horse Mountain unit that follows this reclaimed route should be deleted.

- West of the private property mentioned in the paragraph above (atop Dry Fork highpoint 8517') G45 also appears to be unmaintained using mechanical means. The route has considerable vegetation growing in the road bed. This route does not have any public motorized access, does not meet the criteria for a WIR, and should be closed to motorized traffic.

- All of the routes traveling north off of G45 between the two private parcels atop Horse Mountain (G351, G353, G354, G355, G356, G357, G358, G359, and G363) are completely overgrown and almost indiscernible from the ground. Considerable vegetation exists in their roadbeds, where their roadbeds can be found. For the most part these routes exist on maps only, and not on the ground. These routes should be left within the LWC unit as they do not qualify as WIRs; and for TMP purposes they should be closed and rehabilitated.

- It appears that the segment of G45 that begins at the junction of G43 and G92 may be maintained. It does appear to provide access to the private parcel atop Horse Mountain. If the route is in fact maintained using mechanical means to ensure relatively regular and continuous use, this route should be cherrystemmed out of the LWC unit; if the route is not maintained, it should remain in the unit as a way. The route has no effect on the overall wilderness characteristics of the Horse Mountain unit because it travels directly on the top of the ridge, with steep slopes coming off of both sides, and is not visible to anyone in the unit unless traveling directly on top of it.

- G344 is not constructed using mechanical means nor is it maintained using mechanical means. The route should be closed to motorized travel and left within the expanded LWC unit.

- G342 is a two-track route that does not appear to be regularly maintained. The route should be closed to all motorized travel and rehabilitated.

- The complex of routes to the west of and above Forshay Gulch (G346, G347, G348, and G349) are impassable to vehicles and almost indiscernible from the ground. These routes should be closed to motorized travel and rehabilitated where they have not already been reclaimed naturally.

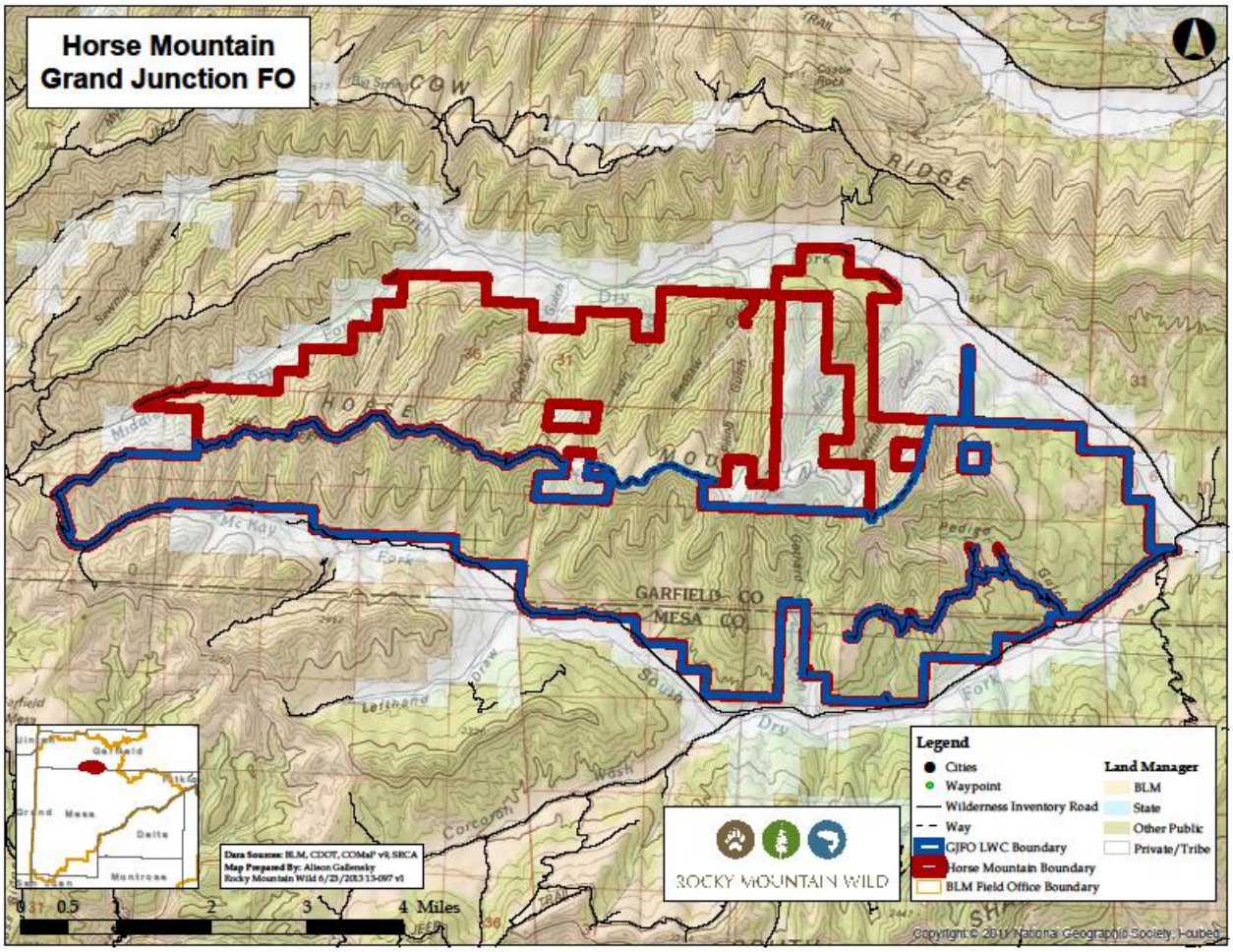
<u>Wilderness Characteristics and the BLM's Wilderness Characteristics Determinations:</u>

Because the boundaries drawn by the BLM for the Horse Mountain unit contained inaccuracies, any assessment of the wilderness characteristics located within the unit are not based on full information. Yet, the BLM's assessment of the wilderness characteristics found in the truncated LWC unit that it analyzed are worth comment. Although the BLM found the unit to meet the size and apparent naturalness criteria, the BLM was not able to find outstanding opportunities for solitude and primitive and/or unconfined recreation. This could be partly due to the fact that only one half of the actually qualifying acreage was analyzed, however the reasons stated in the draft inventory report include the determination that although "opportunities for solitude are present in the unit…these qualities are not outstanding in a regional context as such characteristics can be found in much of the surrounding region" (Draft Inventory, p.80). It is our understanding that simply because opportunities for solitude are found elsewhere in the region, this does not disqualify the opportunities for solitude found within the LWC unit from being outstanding. BLM guidance points out that all opportunities for solitude should

be “assessed on their own merits” (Manual 6310, p. 7) and that the unit being assessed should not be compared to other parcels outside of the unit.

Summary and Recommendation:

The area identified in the BLM’s draft inventory as the Horse Mountain unit is defined by boundaries that do not meet the criteria for Wilderness Inventory Roads or other qualifying boundary features. No supplemental documentation detailing why these boundary decisions were made –including Route Analysis forms or photographs of boundary features—are included in the draft inventory report. Our inventory of the area has shown that the entire north side of Horse Mountain qualifies for inclusion in the Horse Mountain LWC unit. The BLM has not inventoried this area and thus any conclusions made as to the wilderness characteristics present or not within this unit are not based on a complete analysis of the qualifying area. The BLM must re-inventory the entire area that qualifies as a potential lands with wilderness characteristics under current BLM guidance and any determinations made in that inventory as to the unit’s boundaries or wilderness characteristics should be fully documented with geotagged photographs, maps, and Route Analysis forms s required by BLM Manual 6310.



Grand Junction Book Cliffs unit: Hunter Canyon

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Hunter Canyon unit as an area that could meet the criteria for lands with wilderness characteristics. Through spatial data analysis, the BLM identified an area of approximately 32,700 acres around the divide separating the Roan Creek and East Salt Creek/Big Salt Wash drainages. This area was inventoried in 2009—three years prior to the release in 2012 of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands. The result of this inventory is that BLM found 32,200 acres of the Hunter Canyon unit that meets the criteria for size, naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive recreation and unconfined recreation.

During October of 2012 and June of 2013, The Wilderness Society and Conservation Colorado visited Hunter Canyon to conduct an on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries for the unit met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified several adjustments that should be made to the BLM's boundaries for the Hunter Canyon unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map and photosheet). The result is that the Hunter Canyon unit is not an individual unit, but instead connects to the units identified in the BLM's draft inventory as the East Salt Creek and Main Canyon units, as well as the expanded Cow Ridge unit detailed elsewhere in this document. These units, along with several others in the area to which they in turn connect, form a unit we are calling The Grand Junction Book Cliffs unit. A map of the Grand Junction Book Cliffs unit is included elsewhere in this report.

Although we agree with the BLM's findings that the Hunter Canyon unit has outstanding wilderness characteristics, the area defined and analyzed in that assessment is incorrect. Without identifying the true boundaries of a potential LWC unit as defined by Manual 6310, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness

Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the boundaries BLM has proposed for the Hunter Canyon unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The Hunter Canyon unit, as defined by the BLM, is separated from the County Line on its western end by the route identified on BLM Travel Management (TMP) maps as I721/H40. This route dead ends at an active oil and gas well pad on the top of the ridge separating Coal Gulch and Garvey Canyons. Rather than cherrystem this route into a larger unit, the BLM drew an arbitrary boundary connecting I721/U40 to a number of overgrown and unmaintained ways at the head of Coal Gulch. This boundary line follows no existing on-the-ground feature such as a Wilderness Inventory Road or developed right-of-way (photos 8 and 9). This boundary should be deleted resulting in a cherrystem of I721/U40. After this necessary boundary adjustment is made, the Hunter Canyon and County Line units become combined into a single wilderness inventory unit.

At the south end of the BLM's Hunter Canyon unit, another arbitrary boundary line is found. After following Mesa County V 8/10 Road, the boundary line separating the Hunter Canyon unit from the Lipan Wash unit suddenly departs V 8/10 Road and drops down to a private property parcel in Hunter Canyon itself. Although this boundary initially departs V 8/10 road along the faint route labeled H167 (photo 1), the route quickly deteriorates to the point where it is almost completely overgrown and indiscernible. H167 shows no signs of original construction using mechanical means or maintenance using mechanical means (photo 2). The BLM's dividing boundary then continues on past the end of the inventoried H167 and drops into Hunter Canyon along no existing qualifying boundary feature such as a WIR or developed right-of-way. This boundary should be deleted as it does not meet the criteria for a boundary road as defined by Manual 6310. After making this correction, the Lipan Wash and Hunter Canyon units are combined into a single unit.

East across Hunter Canyon, the BLM's boundary for the Hunter Canyon unit again follows an arbitrary line. At the end of the route identified by BLM as H68 (at the junction of H68 and H67) the BLM's boundary leaves all existing on-the-ground features and travels west and north in the middle of the steep cliffs lining Hunter Canyon proper. This boundary does not qualify as a WIR and should be deleted resulting in the combination of the BLM's Hunter Canyon and Main Canyon wilderness inventory units.

On the north side of the BLM's Hunter Canyon unit, a boundary is drawn from the junction of G29 and G41 up to the ridge separating the headwaters of North Dry Fork and Kimball Creek. From there the boundary follows the route identified by BLM as G41 north to the head of Myser Gulch. While G41 appears to have been constructed using mechanical means, the route quickly deteriorates atop the ridge separating Kimball Creek and North Dry Fork creek drainages. Further north, where the boundary route meets the head of Myser Gulch at G300, the boundary veers north along the western ridge of Myser Gulch following no existing on-the-ground feature whatsoever. G300 is certainly not a constructed or maintained route, and even if it were, the boundary arbitrarily continues for around 2 miles past the terminus of this route down into the Kimball Creek drainage. This entire boundary line from the junction of G29 and G41 to its intersection with private property in Kimball Creek should be deleted and the boundary moved to features that qualify for LWC boundaries according to Manual 6310. This results in the combination of the BLM's Hunter Canyon unit with the expanded and corrected Cow Ridge unit as defined in the Cow Ridge section of these comments.

Near and just north of the route labeled G263 on the BLM's TMP maps, the BLM has drawn a boundary from the private property just west of Kimball Creek to the route labeled G13 above Echo Lake and Big Salt Wash. This boundary follows no existing on the ground feature and arbitrarily excludes the public lands at the head of the unnamed canyon system draining east into Kimball Creek. Additionally, the route labeled G13 does not qualify as a WIR on its own. G13 is blocked to public access from both the north and south and does not appear to be maintained using mechanical means. These boundaries should be deleted, resulting in the combination of the BLM's Hunter Canyon and East Salt Creek units into a single LWC unit.

Additional boundary and route comments for the BLM's Hunter Canyon unit:

- I1032, I11 and all the faint ways accessed by these routes including I1029, I1030, I1032, I1033, I1034, I12, and I14 do not qualify as WIRs as these routes are clearly not maintained using mechanical means to ensure relatively regular and continuous use (photos 15, 16, and 17). These routes should not be cherrystemmed out of the LWC unit and for TMP purposes they should be closed to motorized travel and rehabilitated.

- I636 and I1035 are unmaintained routes that serve no discernible purpose. These routes should not be cherrystemmed out of the LWC unit as they do not qualify as WIRs according to BLM Manual 6310. For TMP purposes these routes should be closed to motorized travel and rehabilitated.

- I633 leads from Mesa County V 8/10 road down into Hunter Canyon past several active oil and gas well pads and their associated access roads. At the bottom of Hunter Canyon the character of the road changes significantly at the two producing oil and gas well pads. From this point south, the route (identified by BLM as H164) is no longer maintained using mechanical means. The route travels directly down the intermittent wash of Hunter Canyon and appears to be maintained solely by the passage of vehicles (photos 3, 4, 5, 6, and 7). This route at the bottom of Hunter Canyon (I633, H159, H160, H162, H163, H164, and H165) does not meet the criteria for a WIR and should not be cherrystemmed out of the LWC unit. For TMP purposes this route should be closed to motorized travel as it is promoting extensive resource damage in the intermittent wash.

- The routes identified by the BLM as H67, H68, H71, H72, H75, H74, and H80 are accessed from the private property near Bronco Flats. These routes deteriorate rapidly just west of the large lined water storage pit west of the private property line. These routes serve no motorized recreational purpose and do not qualify as WIRs. They should not be cherrystemmed out of the LWC and should be closed to motorized travel and rehabilitated.

- G166, G168, G262, and G167 are clearly not maintained using mechanical means and should not be cherrystemmed out of the LWC unit. For TMP purposes the routes should be closed to motorized travel and rehabilitated.

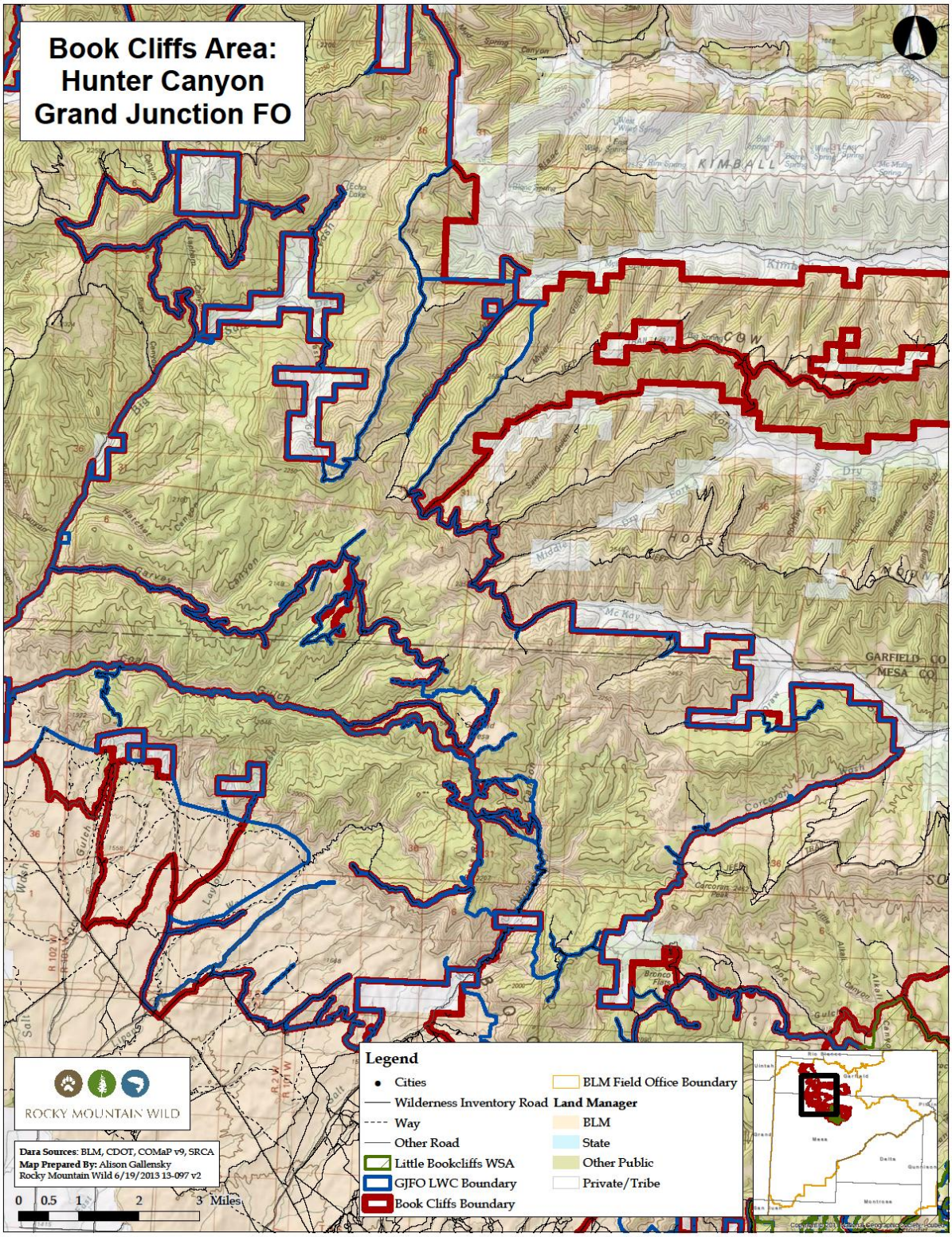
- G161, G162, and G164 provide access to valuable primitive campsites along the highest cliffs overlooking Hunter Canyon. These routes should remain open to motorized travel to their terminus at the primitive campsites along the rim.

- A long route begins begin from private property parcels along McKay Fork (G371, G372, G375, G376, and G377). These routes have no public access and are overgrown and revegetating naturally. These routes should not be cherrystemmed out of the LWC unit and for TMP purposes should be closed to motorized travel and rehabilitated.

- G50 originates from the private property in Lefthand Draw is very overgrown and has no public access. G50 should be closed to motorized travel and rehabilitated. G368 also originates from this private property parcel and serves no obvious purpose. G368 should be closed and rehabilitated.

Summary and Recommendation:

The BLM determined in their draft inventory of potential lands with wilderness characteristics that the area analyzed by BLM as the Hunter Canyon unit contains outstanding wilderness characteristics and thus qualifies for protection as a Lands with Wilderness Characteristics. However, as described throughout this document, the Hunter Canyon unit analyzed by the BLM is conscribed by boundaries that do not meet the criteria for boundary delineation as defined in the BLM's own policies. Although we agree that the area does in fact meet the criteria for a Lands with Wilderness Characteristics, the full acreage of the unit has not be analyzed or discussed. The BLM's draft inventory for the Hunter Canyon unit contains no Route Analysis forms, photographs, or other documentation explaining why certain areas were used as boundaries by the BLM and others were not. The BLM's Hunter Canyon unit should be re-inventoried as part of the larger Book Cliffs unit and any determinations made as to the wilderness characteristics found or not found therein should be documented with geotagged photographs, maps, and route analysis forms as required by BLM Manual 6310.


Book Cliffs Area:
Hunter Canyon
Grand Junction FO
Legend
Cities
Wilderness Inventory Road
Way
Other Road
Little Bookcliffs WSA
GJFO LWC Boundary
Book Cliffs Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/19/2013 13-097 v2
0 0.5 1 2 3 Miles
GARFIELD CO
MESA CO
KIMBALL
COW
Dry
McKay
Corcoran
Bronco Flat

Grand Junction Book Cliffs unit: Hunter Canyon

The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph

Overview Map

Attributes	
File Name	2012 10 10_4777.jpg
Title	
Subject	
Latitude	N 39° 18' 31"
Longitude	W 108° 35' 19"
Elevation	7185 ft
Photo Direction	195° SSW

1 – looking southeast along H167. The BLM's boundary separating the Hunter Canyon and Lipan Wash unit follows this route for a short distance before continuing on cross-country down into Hunter Canyon. H167 shows no signs of original construction using mechanical means nor is it maintained. H167 does not qualify as a Wilderness Inventory Road (WIR) and the boundary following this route should be deleted.

Title:

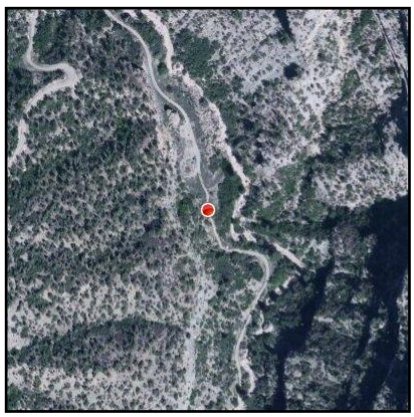
Attributes	
File Name	2012 10 10_4778.jpg
Title	
Subject	
Latitude	N 39° 18' 30"
Longitude	W 108° 35' 17"
Elevation	7174 ft
Photo Direction	116° ESE

2 – looking northwest down H167 from where it disappears entirely. H167 is completely overgrown and is not maintained using mechanical means.

Title:

Attributes	
File Name	2012 10 10_4779.jpg
Title	
Subject	
Latitude	N 39° 19' 26"
Longitude	W 108° 34' 07"
Elevation	5554 ft
Photo Direction	175° S

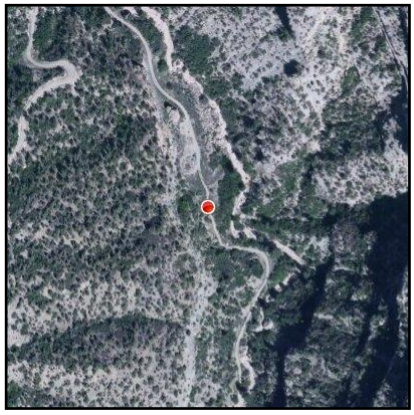
3 – Looking south just south of the two active oil and gas wells at the terminus of I633 at the bottom of Hunter Canyon. Although traveled by motorized vehicles, the route is solely maintained by the passage of vehicles. This route does not qualify as a WIR.

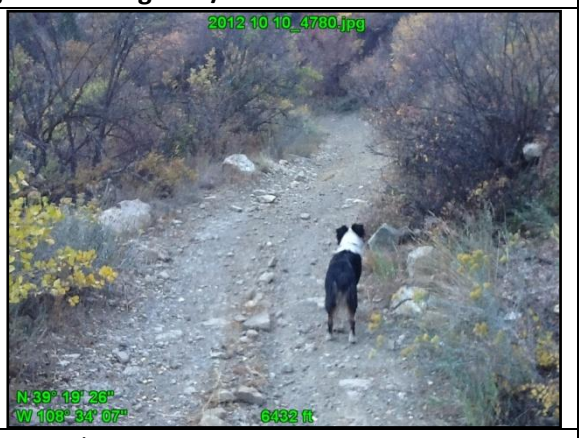


Title:

Attributes	
File Name	2012 10 10_4780.jpg
Title	
Subject	
Latitude	N 39° 19' 26"
Longitude	W 108° 34' 07"
Elevation	6432 ft
Photo Direction	175° S

4 – Looking south along I633/H164.





Title:

Attributes	
File Name	2012 10 10_4781.jpg
Title	
Subject	
Latitude	N 39° 19' 20"
Longitude	W 108° 34' 06"
Elevation	5468 ft
Photo Direction	183° S

5 – one of the many wash crossings along I633/H164. This route appears to be maintained solely by the pasage of vehicles.

Title:

Attributes	
File Name	2012 10 10_4782.jpg
Title	
Subject	
Latitude	N 39° 19' 15"
Longitude	W 108° 34' 06"
Elevation	6322 ft
Photo Direction	191° S

6 – a very rough section of I633/H164. This route is only accessible to those with specialized vehicles as it contains several nearly impassable sections. This route should be closed to motorized travel to protect the wilderness characteristics present in Hunter Canyon. The route does not qualify as a WIR and should not be cherrystemmed out of the LWC.

Title:

Attributes	
File Name	2012 10 10_4783.jpg
Title	
Subject	
Latitude	N 39° 19' 13"
Longitude	W 108° 34' 07"
Elevation	5841 ft
Photo Direction	211° SSW

7 – one of the many rough riverbed crossings along H164/H160. This route is not maintained using mechanical means and is causing extensive resource damage, especially in the streambed. The route should not be cherrystemmed out of the LWC unit and for TMP purposes should be closed to motorized travel.

Title:

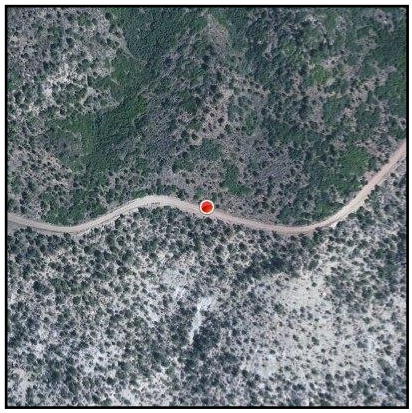
Attributes	
File Name	IMG_20130605_114132.jpg
Title	
Subject	
Latitude	N 39° 21' 26"
Longitude	W 108° 36' 20"
Elevation	
Photo Direction	

8 – looking at point where BLM's boundary dividing the Hunter Canyon and County Line units arbitrarily leaves I721/H40 and heads directly down a steep slope where no existing road or other qualifying boundary feature exists.

Title:

Attributes	
File Name	IMG_20130605_114708.jpg
Title	
Subject	
Latitude	N 39° 21' 27"
Longitude	W 108° 36' 20"
Elevation	
Photo Direction	

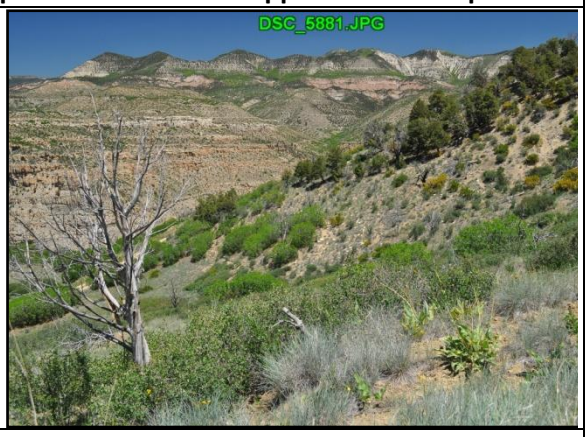
9 – South at the exact point where BLM's boundary separating the Hunter Canyon and County Line units leaves I721/H40 and heads directly down into Coal Gulch. No boundary feature exists at this location and this boundary should be deleted, resulting in the combination of Hunter Canyon and County Line units into a single unit.



Title:

Attributes	
File Name	DSC_5881.JPG
Title	
Subject	
Latitude	
Longitude	
Elevation	
Photo Direction	

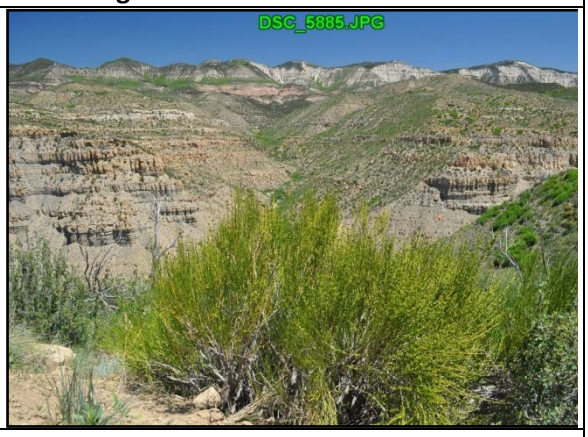
10 – Amazing views are plentiful in the Book Cliffs area of the Grand Junction Field Office. Hiking, horseback riding, backpacking, camping, hunting, photography, and other forms of primitive recreation opportunities are plentiful.



Title:

Attributes	
File Name	DSC_5885.JPG
Title	
Subject	
Latitude	
Longitude	
Elevation	
Photo Direction	

11 – The BLM's Hunter Canyon unit, like the rest of the roadless areas of the Book Cliffs offers countless unique canyons, draws, and ridges where the visitor can find outstanding solitude.



Title:

Attributes	
File Name	DSC_5900.JPG
Title	
Subject	
Latitude	
Longitude	
Elevation	
Photo Direction	

12 – The large size of the BLM's Hunter Canyon unit guarantees outstanding opportunities for solitude and unconfined recreation.

Title:

Attributes	
File Name	DSC_5904.JPG
Title	
Subject	
Latitude	
Longitude	
Elevation	
Photo Direction	

13 – the white cliffs of the Hunter Canyon unit are a prominent landmark in the area.

Title:

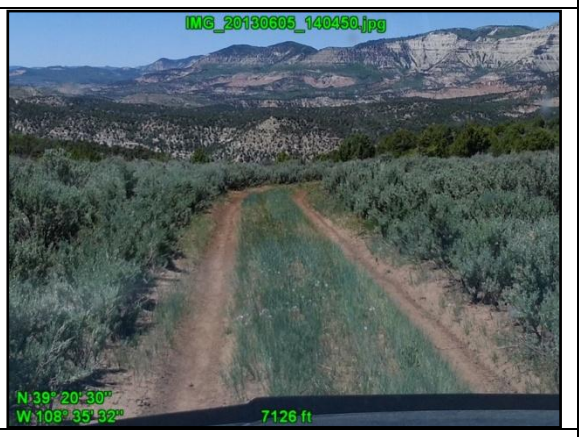
Attributes	
File Name	DSC_5907.JPG
Title	
Subject	
Latitude	
Longitude	
Elevation	
Photo Direction	

14 – the Hunter Canyon units contains a wide range of elevations providing a wide variety of primitive and unconfined recreational opportunities.

Title:

Attributes	
File Name	IMG_20130605_140450.jpg
Title	
Subject	
Latitude	N 39° 20' 30"
Longitude	W 108° 35' 32"
Elevation	7126 ft
Photo Direction	

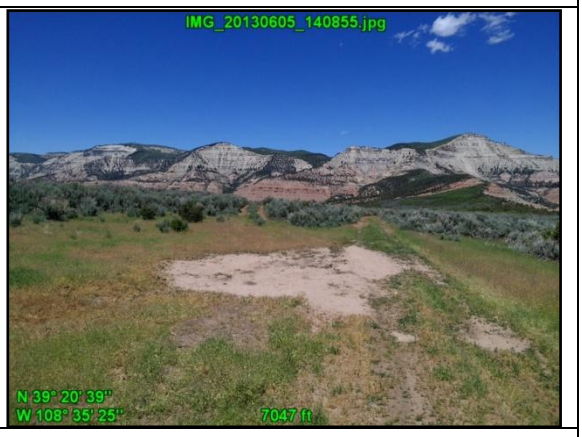
15 – looking northwest along I1032. I1032 is not maintained and does not qualify as a WIR. The route should not be cherrystemmed out of the WIR and for TMP purposes should be closed to motorized travel and rehabilitated.



Title:

Attributes	
File Name	IMG_20130605_140855.jpg
Title	
Subject	
Latitude	N 39° 20' 39"
Longitude	W 108° 35' 25"
Elevation	7047 ft
Photo Direction	

16 – Looking north near the junction of I11 and I1029. These routes are almost entirely invisible from the ground at this location. These routes do not qualify as WIRs and should not be cherrystemmed out of the LWC unit. For TMP purposes these routes should be closed to motorized travel.



Title:

Attributes	
File Name	IMG_20130605_140941.jpg
Title	
Subject	
Latitude	N 39° 20' 39"
Longitude	W 108° 35' 25"
Elevation	7034 ft
Photo Direction	

17 - Looking north near the junction of I11 and I1029. These routes are almost entirely invisible from the ground at this location. These routes do not qualify as WIRs and should not be cherrystemmed out of the LWC unit. For TMP purposes these routes should be closed to motorized travel.

Title:

Grand Junction Book Cliffs unit: Lipan Wash

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Lipan Wash unit as an area that could meet the criteria for lands with wilderness characteristics. Through spatial data analysis, the BLM identified an area of approximately 15,400 acres south of Coal Gulch and containing both Layton and Lipan washes that could qualify as a Lands with Wilderness Characteristics. In 2011—prior to the release in 2012 of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands—these acres were inventoried by BLM. The BLM's inventory found that the Lipan Wash unit meets the criteria for size and naturalness, but that neither outstanding opportunities for solitude nor primitive and/or unconfined recreation are found within the 15,400-acre unit.

During October of 2012 and June of 2013, The Wilderness Society and Conservation Colorado visited Lipan Wash to conduct an in-depth, on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified several adjustments that should be made to the BLM's boundaries for the Lipan Wash unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map and photosheet). The result is that the Lipan Wash unit is not an individual unit, but instead connects to the unit identified in the BLM's draft inventory as the Hunter Canyon unit, which in turn connects to several additional potential LWC units including County Line. These units together form a unit we are calling The Grand Junction Book Cliffs unit. A map and narrative describing the Grand Junction Book Cliffs unit is included in this report.

Because BLM did not accurately define the true boundaries of the potential LWC unit Lipan Wash, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the

boundaries BLM has proposed for the Lipan Wash unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The Lipan Wash unit, as identified by the BLM, is bounded on its south side by boundaries which do not exist on the ground and/or do not qualify as boundary delineation features according to BLM's own policies. Although there are many routes in this area, many of them are singletrack bicycling trails, which in most cases do not meet the criteria for LWC boundaries according to BLM Manual 6310, as they were neither constructed nor are they maintained using mechanical means. The BLM seems to have made no attempt in their draft inventory to identify which routes in the North Fruita desert qualify as WIRs and which do not; instead they simply cut the entire area out of the unit using a somewhat arbitrary boundary cutting from the northwest to the southeast along the base of the Mancos shale cliffs where the Book Cliffs rise out of the Fruita desert.

More specifically, the BLM has drawn a boundary from Mesa County V 8/10 Road down a steep slope into Hunter Canyon proper. This boundary begins along the unmaintained and nearly impassable H167 (photos 8 and 9) and then continues down beyond the terminus of this route into the bottom of Hunter Canyon. H167 does not qualify as a WIR and the boundary beyond this route follows no discernible on-the-ground feature. This boundary line should be deleted resulting in the combination of the BLM's Lipan Wash and Hunter Canyon units.

Additional boundary and route comments for the BLM's Lipan Wash unit:

- I467 is used by narrow motorized vehicles, primarily ATVs and motorcycles. The route, however, does not qualify as a WIR as it is not maintained using mechanical means. The route should be left open as a way, but not cherrystemmed out of the LWC unit as a WIR. The many user-created and/or unmaintained routes that spur off of I467, including I1019, I1023, I1024, and I1025 should be closed to motorized travel and rehabilitated.

- I1039 does not appear to be maintained using mechanical means and serves no obvious purpose. The route is a short spur route off of a county road and does not qualify as a WIR. The route should not be cherrystemmed out of the LWC unit and for Travel Management (TMP) purposes should be closed and rehabilitated.

- I500 connects Mesa County Road V 8/10 with the bottom of Lipan Wash and the North Fruita Desert. This route receives use by mountain bikers and occasional motorized users but is not maintained using mechanical means and does not qualify as a WIR. The route should remain in the LWC unit as a way.

<u>Wilderness Characteristics and the BLM's Wilderness Characteristics Determinations:</u>

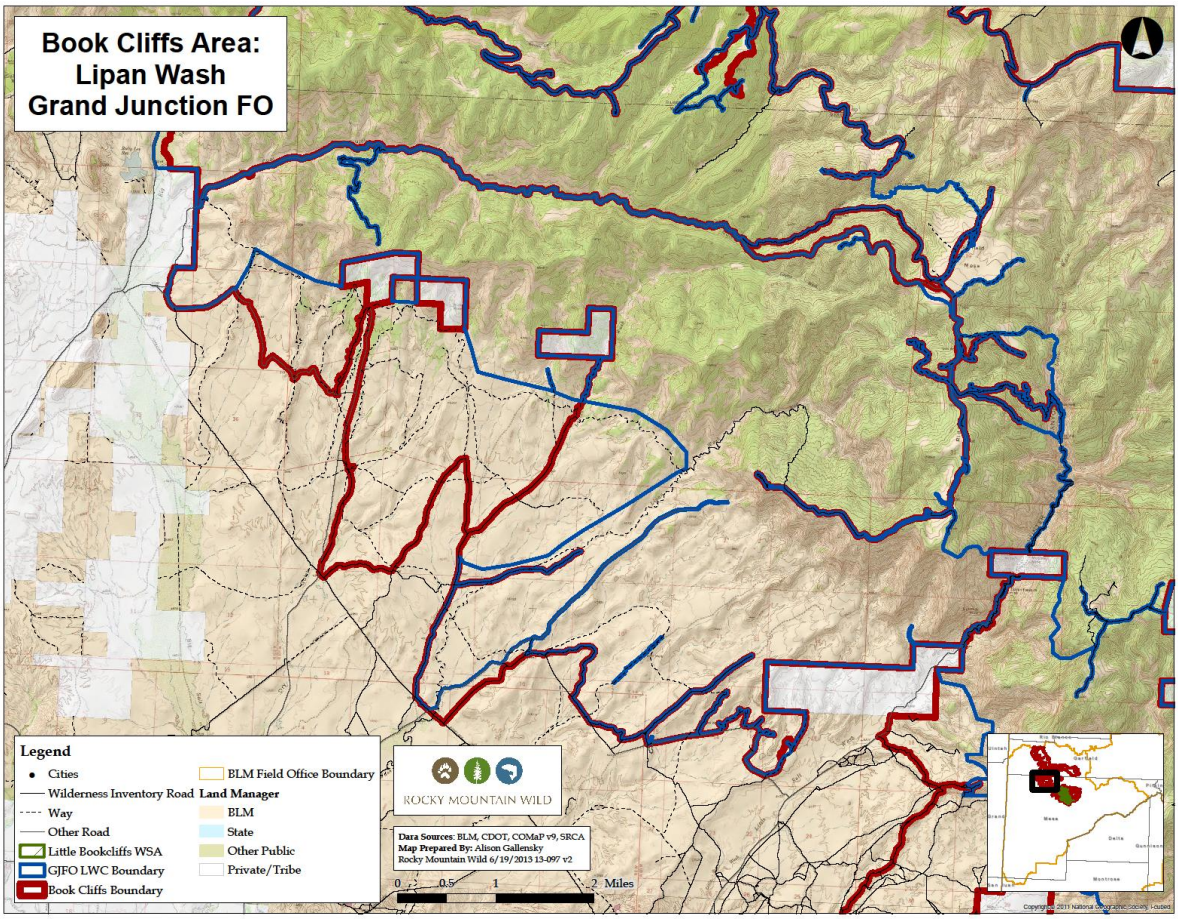
Because the boundaries drawn by the BLM for the Lipan Wash unit contained inaccuracies, any assessment of the wilderness characteristics located within the unit are not based on full information. In fact, the Lipan Wash has no qualifying boundary delineation feature separating it from the BLM's adjacent Hunter Canyon unit—a unit that the BLM found to meet the criteria of a Lands with Wilderness Characteristics. Because these two units are actually a single unit, the same wilderness characteristics

identified by the BLM in the Hunter Canyon unit also exist in the Lipan Wash unit. However, it is worth commenting on the BLM's assessment of the wilderness characteristics in the Lipan Wash unit.

The draft inventory report presumes that low hills of Mancos shale (found in the southern portions of the unit) are not able to provide outstanding opportunities for solitude, despite the fact that many desert areas across the western United States, some with much less topographical relief and vegetative screening than the desert areas analyzed here, have been found by the BLM to contain wilderness characteristics. The report also states that the obvious opportunities for solitude and primitive recreation present in the large drainages of Layton and Lipan washes "are not outstanding in a regional context" (Draft Inventory, p.100), contrary to guidance in revised BLM Manual 6310 which clearly instructs that "[e]ach area must be assessed on its own merits" and to "not compare the lands in question with other parcels. Do not use any type of rating system or scale—whether numerical, alphabetical, or qualitative—in making the assessment. Use professional judgment in determining whether outstanding opportunities exist in each area and document in writing the rationale for arriving at the determination." (Manual 6310, p.7) Whether because the Lipan Wash inventory was completed by BLM prior to the publication of the new BLM guidance on conducting LWC inventories, or whether it was a simple oversight, the draft inventory for the Lipan Wash unit seems to both compare the lands in question with other parcels while failing to assess the opportunities for solitude present within the unit itself, but also fails to "document in writing the rationale for arriving at the determination". All that is provided is a subjective statement by the contractor who conducted the inventory that the Lipan Wash unit's opportunities for solitude are not outstanding "in a regional context"; no further documentation or rationale is given to support that claim. Finally, the draft inventory report makes the statement that the "majority of the unit" is "made up of steep talus slopes or desert terrain" and thus "isn't ideal for primitive recreation" (Draft Inventory, p.100). Outstanding opportunities for unconfined recreation are never analyzed or discussed in the report.

<u>Summary and Recommendation:</u>

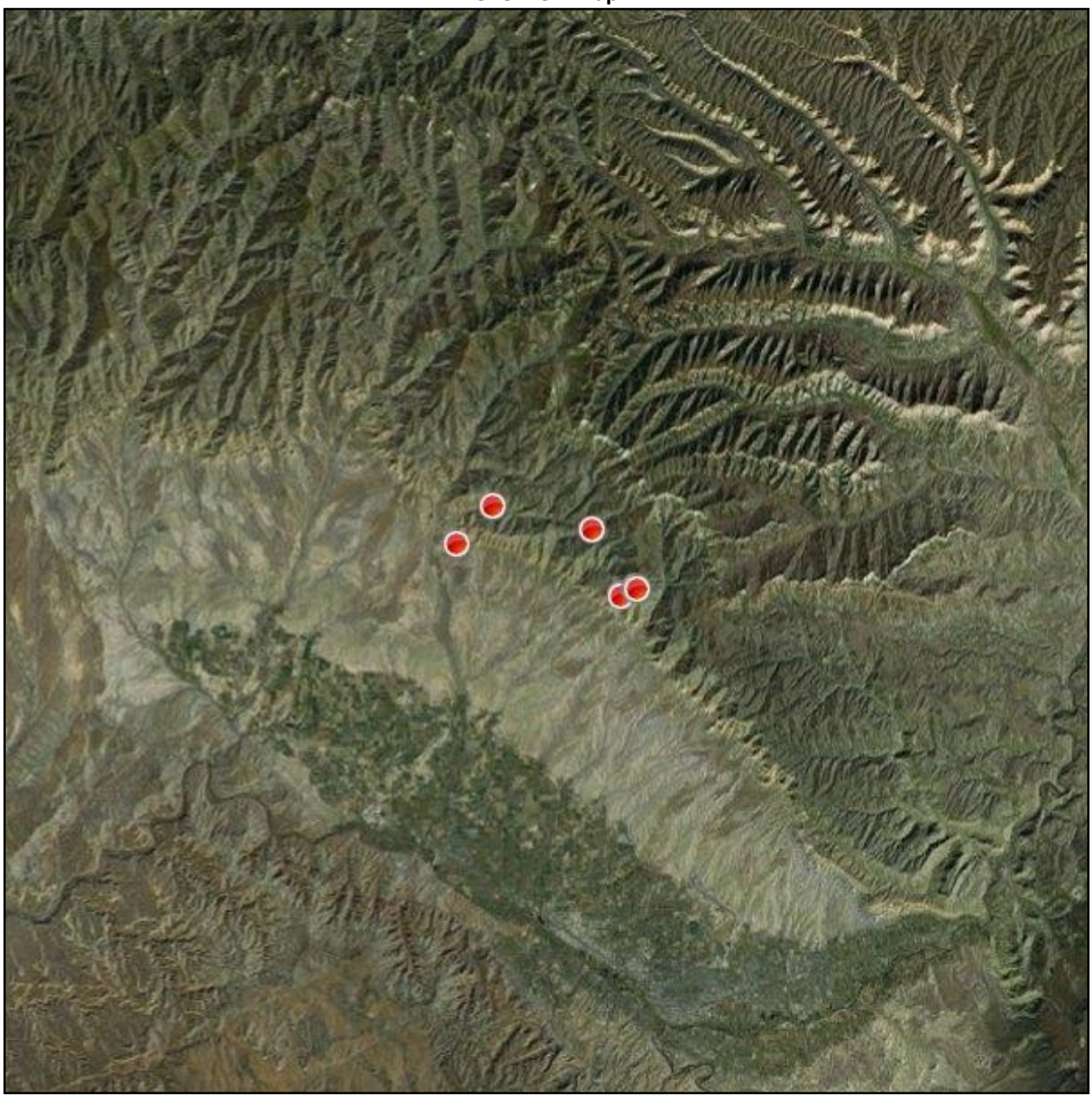
The area identified in the BLM's draft inventory as the Lipan Wash unit is defined by boundaries that do not meet the criteria for Wilderness Inventory Roads or other qualifying boundary features. Because of this, the area analyzed in the BLM's draft inventory report is only part of the complete picture for this area. In fact, the area described by the BLM as the Lipan Wash unit is actually contiguous with the Hunter Canyon unit to the east. Because of this, the determinations made by the BLM about the Lipan Wash unit's lack of outstanding opportunities for solitude and primitive and/or unconfined recreation are incorrect. The BLM must re-inventory the entire area that qualifies as a potential lands with wilderness characteristics under current BLM guidance and any determinations made in that updated inventory as to the unit's boundaries or wilderness characteristics should be fully documented with geotagged photographs, maps, and Route Analysis forms s required by BLM Manual 6310.


Book Cliffs Area:
Lipan Wash
Grand Junction FO
Legend
Cities
Wilderness Inventory Road
Way
Other Road
Little Bookcliffs WSA
GJFO LWC Boundary
Book Cliffs Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/19/2013 13-097 v2
0 0.5 1 2 Miles

Grand Junction Book Cliffs unit: Lipan Wash Photopoints

The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph.

Overview Map



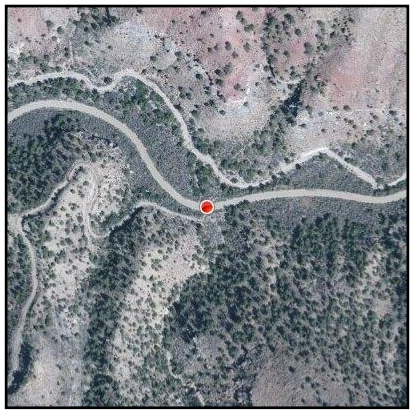
Attributes	
File Name	2012 10 10_4766.jpg
Title	
Subject	
Latitude	N 39° 20' 13"
Longitude	W 108° 43' 35"
Elevation	5270 ft
Photo Direction	309° NW

1 – While the mancos hills in the southern portion of the Lipan Wash unit offer little vegetative screeening, their many fins, spurs, and convoluted ridges offer adequate screening and provide outstanding opportunities for solitude, not to mention easy and outstanding walking opportunties.

Title:

Attributes	
File Name	2012 10 10_4768.jpg
Title	
Subject	
Latitude	N 39° 21' 29"
Longitude	W 108° 41' 55"
Elevation	5457 ft
Photo Direction	170° S

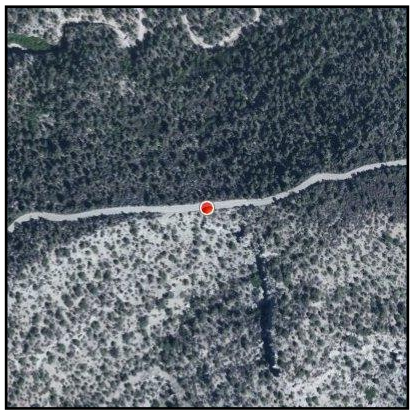
2 – looking west up I467. I467 is only passable to narrow OHV vehicles. Although it may be used by OHVs, the route should not be cherrystemmed out of the LWC unit as it does not qualify as a WIR.



Title:

Attributes	
File Name	2012 10 10_4769.jpg
Title	
Subject	
Latitude	N 39° 20' 42"
Longitude	W 108° 37' 19"
Elevation	6392 ft
Photo Direction	84° E

3 – Layton Wash has thorough vegetative and topographic screening and offers outstanding opportunities for unconfined and primitive recreation.



Title:

Attributes	
File Name	2012 10 10_4773.jpg
Title	
Subject	
Latitude	N 39° 18' 34"
Longitude	W 108° 35' 22"
Elevation	7218 ft
Photo Direction	237° WSW

4 – looking west up I1039. This route recieves little use, has no purpose, and is not maintained. I1039 should not be cherrystemmed out of the LWC unit as it does not qualify as a WIR.

Title:

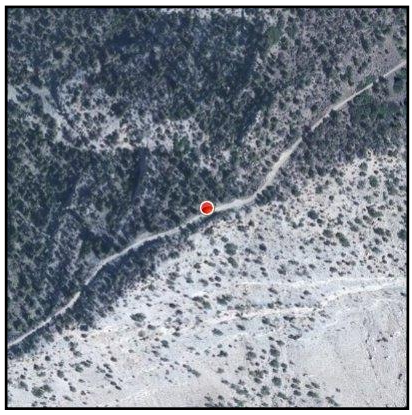
Attributes	
File Name	2012 10 10_4774.jpg
Title	
Subject	
Latitude	N 39° 18' 19"
Longitude	W 108° 35' 58"
Elevation	7149 ft
Photo Direction	253° WSW

5 – looking west and north over Lipan Wash canyon. The extensive juniper-covered shelfs above Lipan Wash, as well as the canyon bottom itself, provide outstaning opportunites for primitive and unconfined recreation.

Title:

Attributes	
File Name	2012 10 10_4775.jpg
Title	
Subject	
Latitude	N 39° 18' 19"
Longitude	W 108° 35' 59"
Elevation	7145 ft
Photo Direction	223° SW

6 – Mesa County Road V 8/10 begins to deteriorate significantly as it approaches its terminus on Ross Ridge.



Title:

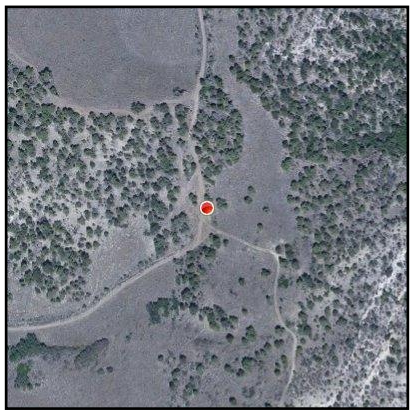
Attributes	
File Name	2012 10 10_4776.jpg
Title	
Subject	
Latitude	N 39° 18' 18"
Longitude	W 108° 35' 59"
Elevation	7136 ft
Photo Direction	241° WSW

7 – Mesa County Road V 8/10.

Title:

Attributes	
File Name	2012 10 10_4777.jpg
Title	
Subject	
Latitude	N 39° 18' 31"
Longitude	W 108° 35' 19"
Elevation	7185 ft
Photo Direction	195° SSW

8 – looking east up the unmaintained H167. This route does not qualify as a WIR and should not be used for LWC boundary delineation purposes.



Title:

Attributes	
File Name	2012 10 10_4778.jpg
Title	
Subject	
Latitude	N 39° 18' 30"
Longitude	W 108° 35' 17"
Elevation	7174 ft
Photo Direction	116° ESE

9 – looking northwest from the top of H167. This route is very overgrown and obviously unmaintained. This route should not be used as an LWC boundary.

Title:

Little Bookcliffs and Little Bookcliffs Wilderness Study Area adjacent areas

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") recognized an approximately 1,600 acres of lands surrounded by the Little Bookcliffs Wilderness Study Area (WSA) as an area that could meet the criteria for lands with wilderness characteristics. These 1,600 acres were left out of the Little Bookcliffs WSA in 1980 because the BLM's inventory at the time concluded that vegetative treatments that had occurred in the area detracted from the area's naturalness, and thus the areas affected by those vegetative treatments were removed from the WSA. In 2009—three years prior to the release in 2012 of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands—a new inventory was prepared for the area and in 2011 it was signed by BLM. This report found that the area still did not meet the naturalness criteria. The report states, "The BLM finds due to the ongoing vegetative treatments and water developments for wild-horse management, the unit does not appear to be primarily affected by the forces of nature and the human influence is currently quite visible to a casual observer" (Draft Inventory, p.106). Except for two photographs in the report time-stamped from 2006 (three years prior to the date of the report's preparation and six years prior to the release of the BLM's complete draft inventory report on Lands with Wilderness Characteristics), no other documentation or evidence for this claim is given. One sentence is and two photographs are simply not adequate for documenting an area's wilderness characteristics or lack thereof, especially when that area lies contiguous with an existing Wilderness Study Area.

During October of 2012 and June of 2013, The Wilderness Society and Conservation Colorado visited the Little Bookcliffs area to conduct an in-depth, on-the-ground field inventory of the Little Bookcliffs WSA and adjacent areas. Our goal was to assess whether the BLM's conclusion listed above as to the area's naturalness still remained valid, given the intervening years since the last thorough inventory of the area was completed by BLM. We also inventoried the periphery of the WSA to assess whether any roadless lands lying adjacent to the WSA met the criteria for recognition as lands with wilderness characteristics according to BLM Manual 6310. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety. Our inventory found that not only does the 1,600 acres identified in the BLM's draft inventory as the Little Bookcliffs WSA expansion clearly meet the naturalness criteria, but that the BLM failed to identify and inventory any additional qualifying areas surrounding and contiguous with the WSA.

BLM's Manual 6310 states that the size criteria for a Lands with Wilderness Characteristics can be met for areas less than 5,000 acres in size if "they are contiguous with lands which have been formally determined to have wilderness or potential wilderness values" including BLM WSAs (Manual 6310, p.5). Our inventory of the Little Bookcliffs WSA and surrounding lands shows that the BLM failed to identify or analyze several such areas surrounding the unit.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the

routes surrounding the Little Bookcliffs WSA do not meet the above criteria for a Wilderness Inventory Road and thus should not be considered as boundaries to WSA-adjacent parcels. Our inventory found that after making appropriate determinations as to a route's qualifications as a WIR, a large area surrounding the Little Bookcliffs WSA (much of which is identified in the BLM's draft inventory as the separate "Asbury and Track Ridges" Wilderness Inventory Unit) qualifies for consideration as a Lands with Wilderness Characteristics. Our inventory also found that these areas lie contiguous with the BLM's Main Canyon LWC unit, which in turn is contiguous with several other LWC units including the Hunter Canyon unit. Collectively these units create what we are calling "The Grand Junction Book Cliffs unit", an LWC area of more than 200,000 acres in size. A map and description of The Grand Junction Book Cliffs unit is included elsewhere in this report. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

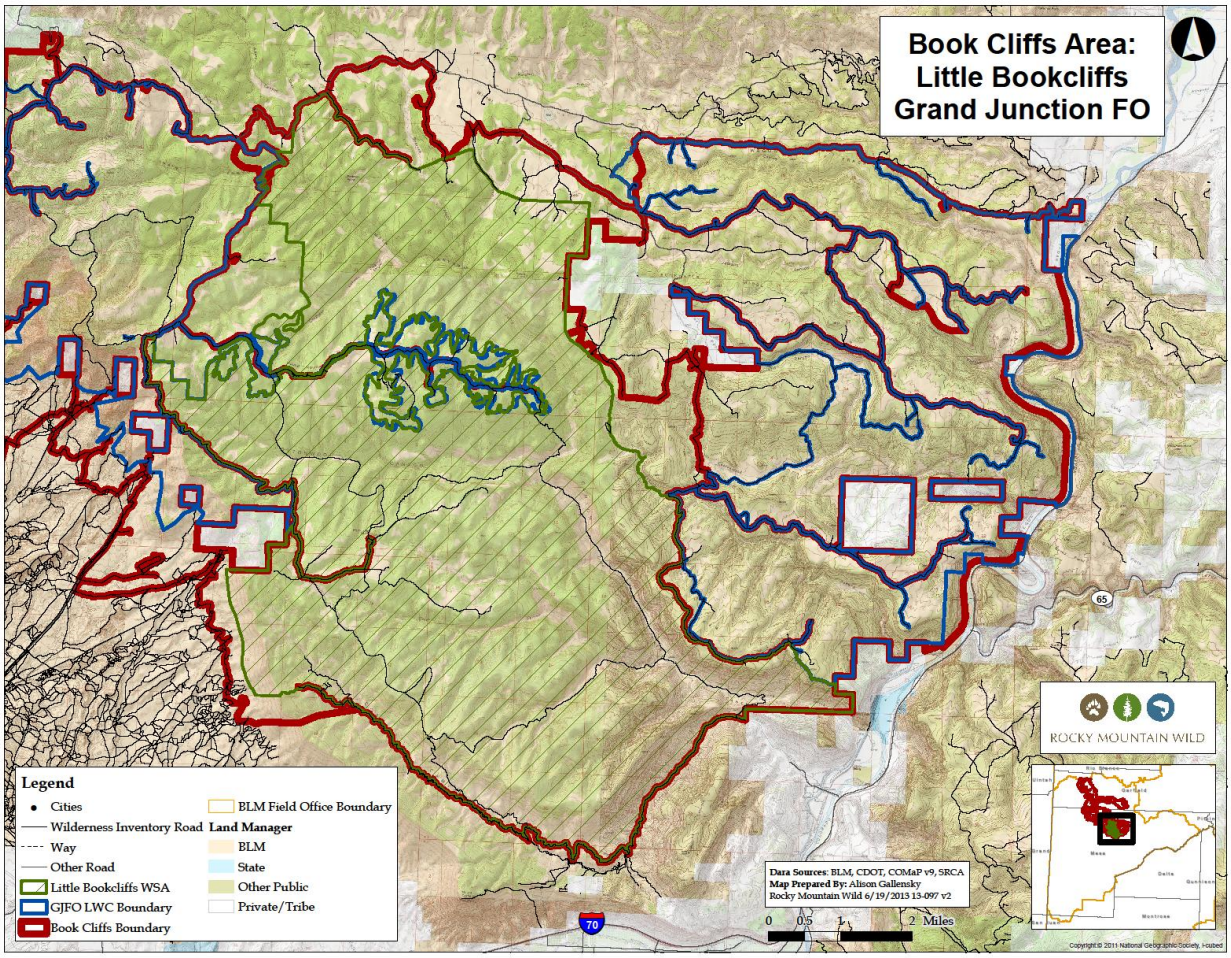
The tree-shaped area excluded from the Little Bookcliffs WSA appears natural to the casual observer as of 2013 (photos 25 and 26). The area appears to be primarily affected by the forces of nature (photo 36). The limited water impoundment structures for wild horses, the old and inactive gas wells atop Round Mountain, and the developed camping and staging area at Low Gap are all either substantially unnoticeable or cut out from the unit. The areas of Round Mountain used as a rationale by the BLM for excluding the area from the WSA are now so recovered and regrown as to appear completely natural (photos 25, 26, 31, and 33). Unlike the documentation presented here, the documentation used by the BLM in their draft inventory report to support their claim that the area lacks naturalness is incomplete and outdated. The narrative describing the lack of naturalness consists of a single sentence and the two photographs that are included are more than seven years old. The Little Bookcliffs WSA Expansion unit, as identified by the BLM, appears natural and primarily affected by the forces of nature and should be given the same level of protection as the surrounding WSA.

Additionally, the BLM has failed to identify any areas surrounding the WSA that could qualify as lands with wilderness characteristics. Our inventory found numerous areas that are both contiguous with the WSA and contain wilderness characteristics that should be recognized and analyzed by the BLM (see attached map).

Additional boundary and route comments for the BLM's Little Bookcliffs WSA Expansion unit are included in the comments in the attached photosheet.

<u>Summary and Recommendation:</u>

The area identified in the BLM's draft inventory as the Little Bookcliffs WSA Expansion unit was not adequately inventoried. Further, the BLM failed to consider several areas adjacent to the WSA that meet the size criteria for consideration because of their adjacent location contiguous to the WSA. The BLM must re-inventory the entire area that qualifies as a potential lands with wilderness characteristics under current BLM guidance and any determinations made in that updated inventory as to the unit's boundaries or wilderness characteristics should be fully documented with geotagged photographs, maps, and Route Analysis forms s required by BLM Manual 6310.


Book Cliffs Area:
Little Bookcliffs
Grand Junction FO
ROCKY MOUNTAIN WILD
Legend
Cities
Wilderness Inventory Road
Way
Other Road
Little Bookcliffs WSA
GJFO LWC Boundary
Book Cliffs Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/19/2013 13-097 v2
0 0.5 1 2 Miles
70
65
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GJFO - Little Bookcliffs

The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph

Overview Map

Attributes	
File Name	IMG_1292.JPG
Title	
Subject	
Latitude	N 39° 11' 47"
Longitude	W 108° 26' 14"
Elevation	6588 ft
Photo Direction	0° N

1 – Looking northeast at the start of M58. M58 is not maintained using mechanical means throughout its length. The route is narrow and deadends abruptly with no space for turnaround. The route provides and is popular for its oustanding primitive horseback ridgin opportunities. The route should remain open to all non-motorized travel.

Title:

Attributes	
File Name	IMG_1293.JPG
Title	
Subject	
Latitude	N 39° 11' 51"
Longitude	W 108° 26' 05"
Elevation	6660 ft
Photo Direction	0° N

2 – M58. This route is not constructed using mechanical means. No cut or blading is evident here.

Title:

Attributes	
File Name	IMG_1294.JPG
Title	
Subject	
Latitude	N 39° 11' 59"
Longitude	W 108° 26' 08"
Elevation	6476 ft
Photo Direction	0° N

3 – M60. M60 is not constructed using mechanical means. No blading is evident here as the route travels over every bumb or rise in the surrounding landscape. M60 should be closed to motorized travel.

Title:

Attributes	
File Name	IMG_1295.JPG
Title	
Subject	
Latitude	N 39° 12' 01"
Longitude	W 108° 26' 07"
Elevation	6447 ft
Photo Direction	0° N

4 – M60 dead ends abruptly on a steeply angled slope above a side drainage to Cottonwood Canyon in the WSA. There is no turnaround here and the soil is loose. Vehicles are causing extensive resource damage either pushing further down the slope or creating numerous turnaround spots at the end of M60. This route should be closed to motorized travel.

Title:

Attributes	
File Name	IMG_1296.JPG
Title	
Subject	
Latitude	N 39° 11' 25"
Longitude	W 108° 26' 20"
Elevation	6657 ft
Photo Direction	0° N

5 – east at the junction of M51 and M60. M60 (left) shows signs of recent blading while M51 is a two-track route showing no signs of mechanical maintenance. M51 should be closed to motorized travel and rehabilitated.

Title:

Attributes	
File Name	IMG_1297.JPG
Title	
Subject	
Latitude	N 39° 11' 27"
Longitude	W 108° 25' 59"
Elevation	6601 ft
Photo Direction	0° N

6 – the eastern terminus of M51. This route should be closed and rehabilitated. It serves no administrative or permitted purpose and is very overgrown.

Title:

Attributes	
File Name	IMG_1298.JPG
Title	
Subject	
Latitude	N 39° 11' 21"
Longitude	W 108° 26' 07"
Elevation	6643 ft
Photo Direction	0° N

7 – near the western end of M46. This route appears to be maintained solely by the passage of vehicles. It recieves very little use.

Title:

Attributes	
File Name	IMG_1299.JPG
Title	
Subject	
Latitude	N 39° 11' 14"
Longitude	W 108° 25' 54"
Elevation	6729 ft
Photo Direction	0° N

8 – M46.

Title:

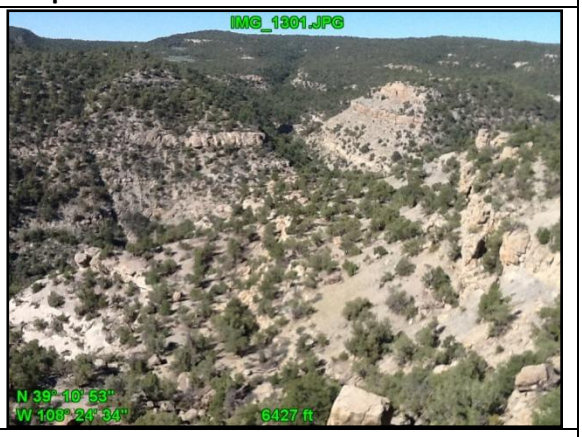
Attributes	
File Name	IMG_1300.JPG
Title	
Subject	
Latitude	N 39° 11' 19"
Longitude	W 108° 25' 44"
Elevation	6660 ft
Photo Direction	0° N

9 – as M46 proceeds to the east it becomes increasingly rough and unmaintained. The route is very narrow in spots and is likely only passable to narrow vehicles such as OHVs.

Title:

Attributes	
File Name	IMG_1301.JPG
Title	
Subject	
Latitude	N 39° 10' 53"
Longitude	W 108° 24' 34"
Elevation	6427 ft
Photo Direction	0° N

10 – at the terminus of M46 above Spring Creek within the Little Bookcliffs WSA. M46 should be closed to motorized travel to protect the ouststanding wilderness characteristics present in the area.



Title:

Attributes	
File Name	IMG_1302.JPG
Title	
Subject	
Latitude	N 39° 10' 53"
Longitude	W 108° 24' 34"
Elevation	6427 ft
Photo Direction	0° N

11 – at the terminus of M46 above Spring Creek canyon.

Title:

Attributes	
File Name	IMG_1303.JPG
Title	
Subject	
Latitude	N 39° 10' 56"
Longitude	W 108° 24' 31"
Elevation	6460 ft
Photo Direction	0° N

12 – east along M47. M47 is likely user-created. The route is overgrown and rutted. M47 should be closed to motorized travel to protect the wilderness and wildlife resources present in the Little Bookcliffs WSA.

Title:

Attributes	
File Name	IMG_1304.JPG
Title	
Subject	
Latitude	N 39° 11' 02"
Longitude	W 108° 24' 22"
Elevation	6424 ft
Photo Direction	0° N

13 – the terminus of M47. Vehicles continue to attempt to push past the sign marking the closed area. Resource damage is occurring. M47 should be closed to motorized travel.

Title:

Attributes	
File Name	IMG_1305.JPG
Title	
Subject	
Latitude	N 39° 11' 18"
Longitude	W 108° 25' 40"
Elevation	6588 ft
Photo Direction	0° N

14 – west along M46. No the lack of cuts or scatter piles on the side of the route.

Title:

Attributes	
File Name	IMG_1306.JPG
Title	
Subject	
Latitude	N 39° 11' 17"
Longitude	W 108° 27' 12"
Elevation	6739 ft
Photo Direction	0° N

15 – junction of M60 and M49.

Title:

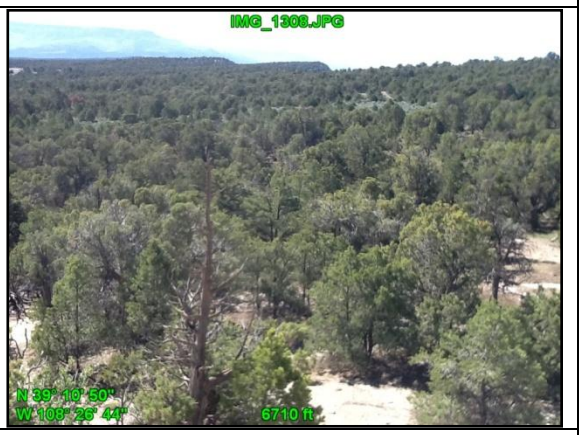
Attributes	
File Name	IMG_1307.JPG
Title	
Subject	
Latitude	N 39° 11' 09"
Longitude	W 108° 27' 03"
Elevation	6709 ft
Photo Direction	148° SSE

16 – Although the beginning of M49 appears constructed using mechanical means, it is unclear whether this route is regularly mechanically maintained. The route condition deteriorates beyond this point. M49 should be closed to motorized travel to enhance the popular non-motorized recreation opportunities in the WSA, primarily horseback riding.

Title:

Attributes	
File Name	IMG_1308.JPG
Title	
Subject	
Latitude	N 39° 10' 50"
Longitude	W 108° 26' 44"
Elevation	6710 ft
Photo Direction	74° ENE

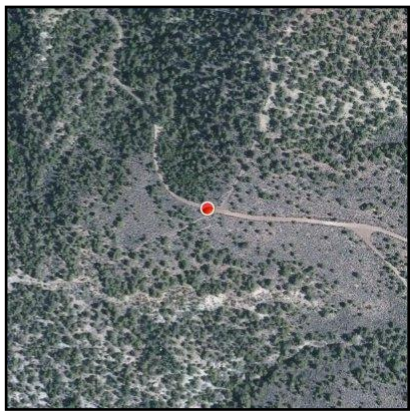
17 – view from M49.



Title:

Attributes	
File Name	IMG_1309.JPG
Title	
Subject	
Latitude	N 39° 11' 18"
Longitude	W 108° 27' 18"
Elevation	6809 ft
Photo Direction	285° WNW

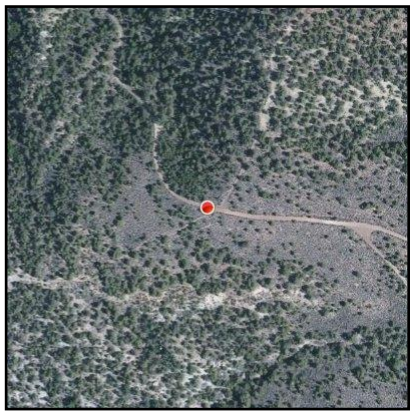
18 – looking west/southwest at head of M48. M48 is almost invisible from the ground and should be officially closed to motorized travel.



Title:

Attributes	
File Name	IMG_1310.JPG
Title	
Subject	
Latitude	N 39° 11' 18"
Longitude	W 108° 27' 18"
Elevation	6809 ft
Photo Direction	285° WNW

19 – looking north up M50. M50 is not maintained using mechanical means and is overgrown, blocked in places by fallen timber, and has significant biological crusts growing on the sandy soils of its former road bed. M50 should be closed to all motorized travel and rehabilitated.



Title:

Attributes	
File Name	IMG_1311.JPG
Title	
Subject	
Latitude	N 39° 13' 35"
Longitude	W 108° 29' 53"
Elevation	7036 ft
Photo Direction	0° N

20 – view into the Grand Valley near Corcoran Point from M68. M68 offers on of the view primitive camping opportunties along Mesa County V 2/10 road. This route should remain open to motorized travel.

Title:

Attributes	
File Name	IMG_1312.JPG
Title	
Subject	
Latitude	N 39° 14' 08"
Longitude	W 108° 29' 52"
Elevation	7077 ft
Photo Direction	0° N

21 – Eastern end of M419. M419 should be closed to motorized travel.

Title:

Attributes	
File Name	IMG_1313.JPG
Title	
Subject	
Latitude	N 39° 14' 09"
Longitude	W 108° 29' 53"
Elevation	7106 ft
Photo Direction	0° N

22 – view north across the BLM's Main Canyon LWC unit . This area offers oustanding solitude and primitive recreation opportunities.

Title:

Attributes	
File Name	IMG_1314.JPG
Title	
Subject	
Latitude	N 39° 14' 02"
Longitude	W 108° 28' 47"
Elevation	7031 ft
Photo Direction	0° N

23 – a pipeline follows the length of Mesa County Q Rd.

Title:

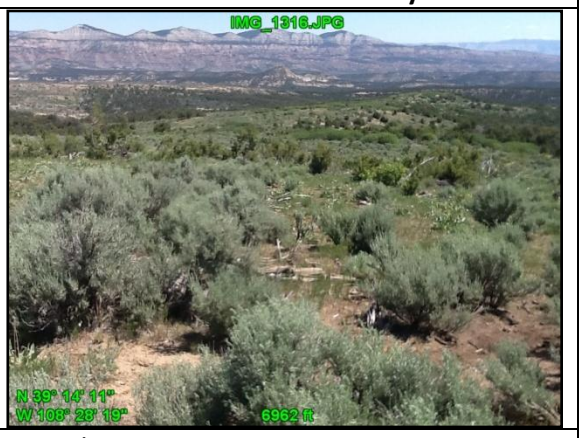
Attributes	
File Name	IMG_1315.JPG
Title	
Subject	
Latitude	N 39° 14' 02"
Longitude	W 108° 28' 47"
Elevation	7031 ft
Photo Direction	0° N

24 – looking north towards South Shale Ridge.

Title:

Attributes	
File Name	IMG_1316.JPG
Title	
Subject	
Latitude	N 39° 14' 11"
Longitude	W 108° 28' 19"
Elevation	6962 ft
Photo Direction	0° N

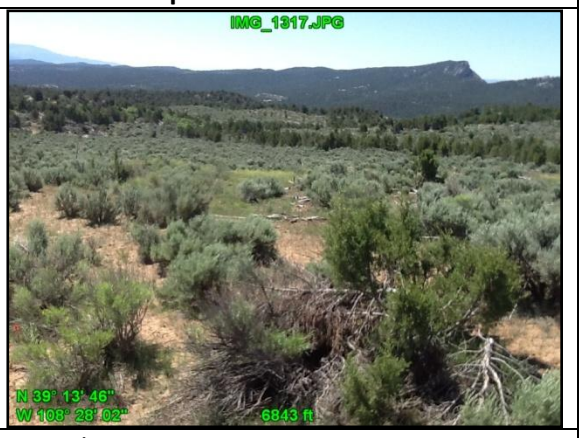
25 – looking northeast across an area excluded by the BLM because of its lack of naturalness. The photograph shows that this area looks entirely natural.



Title:

Attributes	
File Name	IMG_1317.JPG
Title	
Subject	
Latitude	N 39° 13' 46"
Longitude	W 108° 28' 02"
Elevation	6843 ft
Photo Direction	0° N

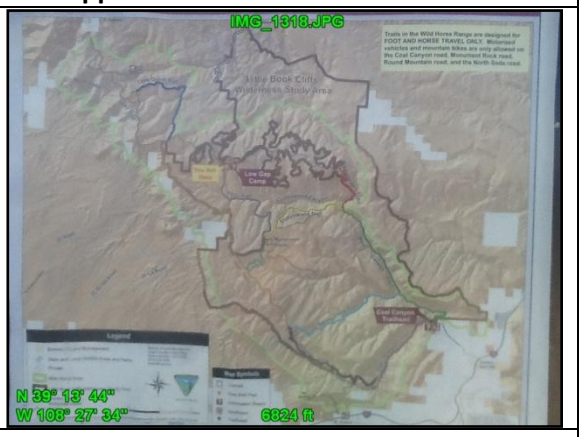
26 – looking south directly across an area excluded from the WSA in 1980 because of its, at the time, lack of naturalness. In the 33 intervening years, this area has recovered to the point where the casual visitor would not detect any change in naturalness from the surrounding WSA. This area lies adjacent to the WSA and because of its apparent naturalness, its inherited wilderness characteristics should be protected.



Title:

Attributes	
File Name	IMG_1318.JPG
Title	
Subject	
Latitude	N 39° 13' 44"
Longitude	W 108° 27' 34"
Elevation	6824 ft
Photo Direction	0° N

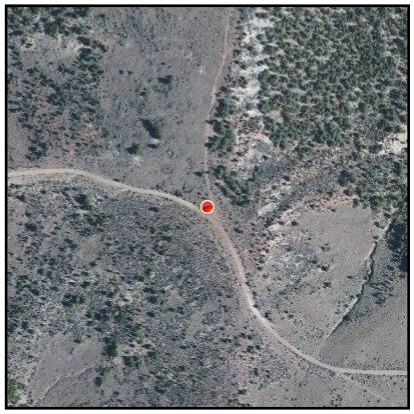
27 – a map at the Low Gap camp detailing the outstanding primitive and unconfined recreation opportunties in the area.



Title:

Attributes	
File Name	IMG_1319.JPG
Title	
Subject	
Latitude	N 39° 14' 07"
Longitude	W 108° 26' 20"
Elevation	6788 ft
Photo Direction	0° N

28 – north at head of M83. This route is a two-track route that is not maintained using mechanical means. M83 should be closed to motorized travel and rehabilitated.



Title:

Attributes	
File Name	IMG_1320.JPG
Title	
Subject	
Latitude	N 39° 14' 13"
Longitude	W 108° 26' 19"
Elevation	6760 ft
Photo Direction	197° SSW

29 – further north down M83. M83 does not appear to have been constructed using mechanical means. It is not currently maintained using mechanical means. The route should be closed to motorized travel and rehabilitated.

Title:

Attributes	
File Name	IMG_1321.JPG
Title	
Subject	
Latitude	N 39° 14' 13"
Longitude	W 108° 26' 19"
Elevation	6760 ft
Photo Direction	197° SSW

30 – looking across another area omitted from the WSA because of vegetative treatments that occurred prior to 1980. The area now appears natural to the casual visitor.

Title:

Attributes	
File Name	IMG_1322.JPG
Title	
Subject	
Latitude	N 39° 14' 02"
Longitude	W 108° 26' 14"
Elevation	6761 ft
Photo Direction	111° ESE

31 – looking southeast down M91. This route was not constructed using mechanical means and is overgrown and unmaintained. M91 should be closed to motorized travel and rehabilitated.

Title:

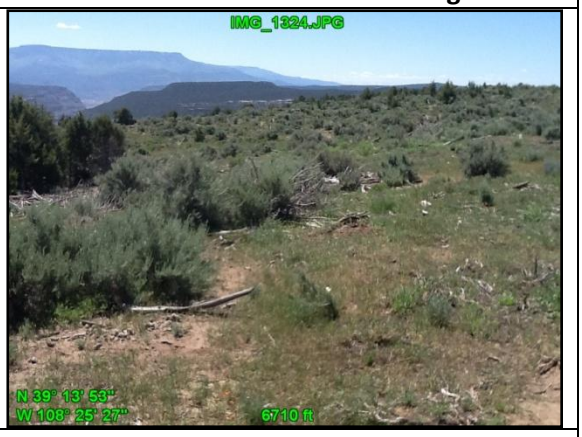
Attributes	
File Name	IMG_1323.JPG
Title	
Subject	
Latitude	N 39° 13' 53"
Longitude	W 108° 25' 27"
Elevation	6710 ft
Photo Direction	190° S

32 – M79. M79 appears to be maintained solely by the passage of vehicles. M79 should be closed to motorized travel to protect the wilderness and wildlife resources present in the WSA.

Title:

Attributes	
File Name	IMG_1324.JPG
Title	
Subject	
Latitude	N 39° 13' 53"
Longitude	W 108° 25' 27"
Elevation	6710 ft
Photo Direction	190° S

33 – southeast across a large area left out of the WSA by BLM because of vegetative treatments prior to 1980. This area has reclaimed itself naturally and to the casual visitor appears natural and no different than surrounding terrain.



Title:

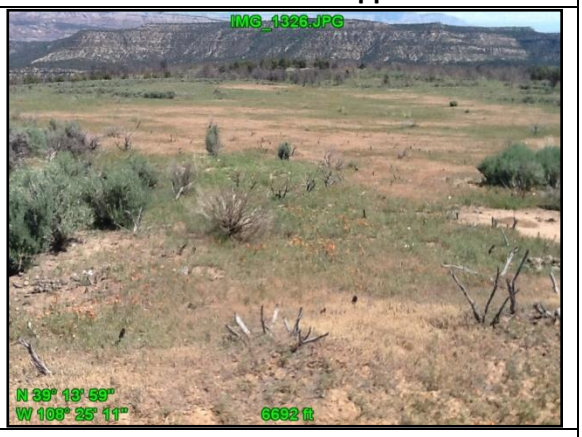
Attributes	
File Name	IMG_1325.JPG
Title	
Subject	
Latitude	N 39° 13' 41"
Longitude	W 108° 25' 28"
Elevation	6691 ft
Photo Direction	123° ESE

34 – M79. M79 is overgrown and fragile. The route should be closed to motorized travel to protect the wilderness and wildlife characteristics of the area.

Title:

Attributes	
File Name	IMG_1326.JPG
Title	
Subject	
Latitude	N 39° 13' 59"
Longitude	W 108° 25' 11"
Elevation	6692 ft
Photo Direction	102° ESE

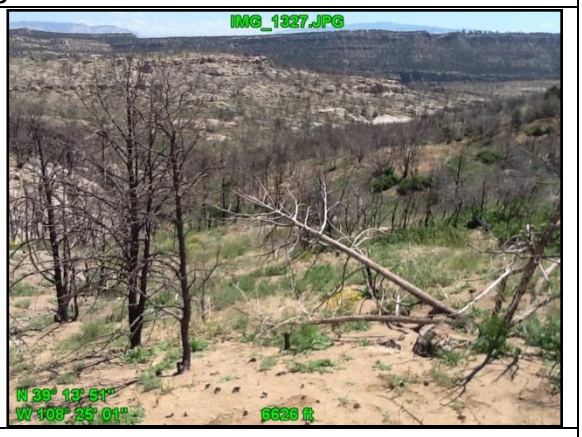
35 – looking north across a large area left out of the WSA by BLM because of its lack of apparent naturalness in 1980. 33 years later this particular area looks not unlike an area recovering from fire and to the casual visitor appears natural.



Title:

Attributes	
File Name	IMG_1327.JPG
Title	
Subject	
Latitude	N 39° 13' 51"
Longitude	W 108° 25' 01"
Elevation	6626 ft
Photo Direction	156° SSE

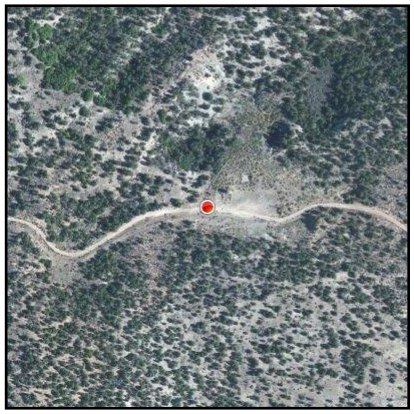
36 – looking northeast down a tributary to Main Canyon. This area was left out of the Little Bookcliffs WSA because of the BLM's interpretation that it lacked naturalness. Despite having recently burned, the area currently appears natural to the casual visitor and not unlike anywhere else in the region where naturally-occuring fire scars are found.



Title:

Attributes	
File Name	IMG_1328.JPG
Title	
Subject	
Latitude	N 39° 13' 42"
Longitude	W 108° 24' 39"
Elevation	6523 ft
Photo Direction	98° E

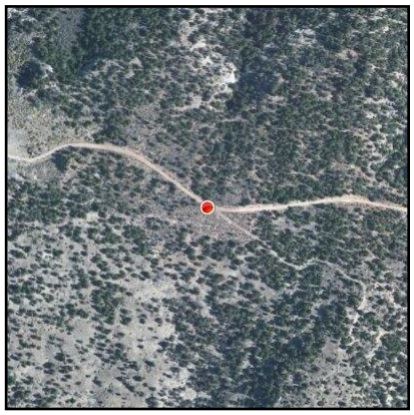
37 – the nonproducing and inactive well pad along M73. This well was completed in the early 1960s and has been shut in for decades. The storage tanks should be removed and the site fully reclaimed.



Title:

Attributes	
File Name	IMG_1329.JPG
Title	
Subject	
Latitude	N 39° 13' 40"
Longitude	W 108° 24' 29"
Elevation	6517 ft
Photo Direction	104° ESE

38 – southeast down M81. M81 is overgrown and sandy and should be officially closed and rehabilitated.



Title:

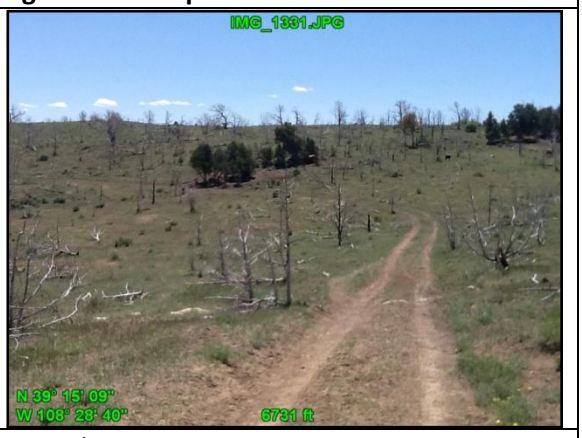
Attributes	
File Name	IMG_1330.JPG
Title	
Subject	
Latitude	N 39° 13' 40"
Longitude	W 108° 23' 49"
Elevation	6434 ft
Photo Direction	138° SE

39 – wild horses near the trailhead at the end of M73.

Title:

Attributes	
File Name	IMG_1331.JPG
Title	
Subject	
Latitude	N 39° 15' 09"
Longitude	W 108° 28' 40"
Elevation	6731 ft
Photo Direction	9° N

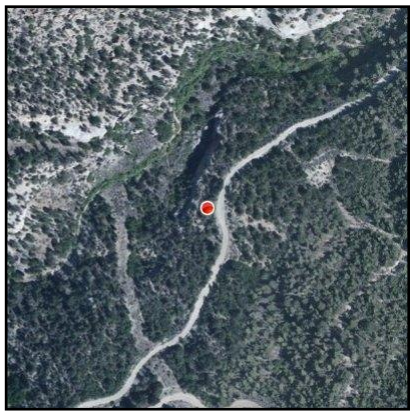
40 – looking southeast up M92.



Title:

Attributes	
File Name	IMG_1332.JPG
Title	
Subject	
Latitude	N 39° 16' 11"
Longitude	W 108° 28' 10"
Elevation	6152 ft
Photo Direction	0° N

41 – looking down a drainage in the BLM's Main Canyon potential LWC unit. Main Canyon has vegetative and topographical variety and offers outstanding opportunities for solitude.



Title:

Attributes	
File Name	IMG_1333.JPG
Title	
Subject	
Latitude	N 39° 16' 44"
Longitude	W 108° 21' 43"
Elevation	5794 ft
Photo Direction	72° ENE

42 – a new well being drilled off of F266. F266 and others in the area leading to oil and gas well pads, should only be open as long as those well pads are active and then should be fully reclaimed and closed to motorized travel.

Title:

Grand Junction Book Cliffs unit: Main Canyon

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Main Canyon unit as an area that could meet the criteria for lands with wilderness characteristics. Through spatial data analysis, the BLM identified an area of approximately 12,600 acres west of the Little Bookcliffs Wilderness Study Area (WSA) that could qualify as a Lands with Wilderness Characteristics. In 2011—prior to the release in 2012 of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands—these acres were inventoried by BLM. The determinations made in the BLM's draft inventory for Main Canyon are confusingly contradictory. For example, in "Form 2" of the report, the box marked "No" is checked under the subheading describing whether or not the area is in a natural condition, yet the narrative begins with the sentence, "The unit is considered to be in a natural state" and goes on to say that "the slopes and drainages have not been manipulated by man and retain their natural state" (Draft Inventory, p.127). The draft inventory then goes on to describe a lack of outstanding opportunities for solitude or primitive and/or unconfined recreation, which if the BLM had already concluded that the area does not have apparent naturalness, should not be analyzed. Either way, the BLM's conclusion that the area does not meet the necessary for lands with wilderness characteristics is clear.

During November of 2012 and June of 2013, The Wilderness Society and Conservation Colorado visited Main Canyon to conduct an in-depth, on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified several adjustments that should be made to the BLM's boundaries for the Main Canyon unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map and photosheet). The result is that the Main Canyon unit is not an individual unit, but instead connects to, and is contiguous with, the unit identified in the BLM's draft inventory as the Hunter Canyon unit, as well as to the Little Bookcliffs WSA. These areas in turn connect to several additional potential LWC units and together form a unit we are calling The Grand Junction Book Cliffs unit. A map and narrative describing the Grand Junction Book Cliffs unit is included in this report.

Because BLM did not accurately define the true boundaries of the potential LWC unit Main Canyon, any determination of the wilderness characteristics, or any management decisions based on these determinations, are not based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the boundaries BLM has proposed for the Main Canyon unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The Main Canyon unit, as identified by the BLM, is bounded on its southeast side by boundaries which do not exist on the ground and/or do not qualify as boundary delineation features according to BLM's own policies. At the eastern end of the BLM's Main Canyon unit, the BLM's boundary line follows M60 to the southeast. As this boundary dips behind the private property at the head of Mesa County's 27 ¼ Road (Book Cliff Mine), the boundary takes a sudden turn off of M60 and cuts directly across to the private property boundary. This boundary segment follows no on-the-ground feature such as a WIR or developed right-of-way and arbitrarily omits the adjacent and contiguous Little Book Cliffs WSA. This boundary line should be deleted and the Main Canyon unit should be inventoried as a unit contiguous with the WSA.

As described in our narrative for the Hunter Canyon unit found elsewhere in this document, the BLM's boundary separating Hunter Canyon and Main Canyon in the area around H67 is also arbitrary and doesn't meet the BLM's own guidelines. A boundary is drawn down fromH67 into the bottom of Hunter Canyon that follows no existing WIR or other qualifying boundary feature. This boundary should be deleted, resulting in the combination of the BLM's Hunter Canyon and Main Canyon Wilderness Inventory Units.

The BLM's Main Canyon unit is bounded on its south side by boundaries which do not exist on the ground and/or do not qualify as boundary delineation features according to BLM's own policies. Although there are many routes in this desert areas near the base of the Book Cliffs the BLM seems to have made no attempt in their draft inventory to identify which routes in this area qualify as WIRs and which do not; instead they simply cut the entire area out of the unit using a somewhat arbitrary boundary cutting from the northwest to the southeast along the base of the Mancos shale cliffs where the Book Cliffs rise out of the desert. BLM should use delete this random boundary and match the boundary up with qualifying WIRs or other features, and if not, BLM should provide detailed rationale for the boundary decisions on this south/southwestern boundary so that the public can understand why those decisions were made. In the BLM's draft inventory report, not a single photograph or Route Analysis form is included to shed light on the BLM's boundary decisions for the Main Canyon unit.

Additional boundary and route comments for the BLM's Main Canyon unit:

- M197 does not appear to be maintained using mechanical means to ensure regular and continuous use. Although this route may provide occasional access to the private property to the west, it seems that the primary access for this private parcel is via Mesa County Road X 5/10 from the north in Corcoran Wash. Even if M197 does act as an important and non-redundant access route to the private property, if the route does not qualify as a WIR for lands with

wilderness characteristics inventorying purposes the boundary following it should be deleted and the route left within the unit as a way.

- M195 is almost completely invisible on the ground. The route is nothing more than a serious of cattle or big-game tracks. For TMP purposes this route should be officially closed to motorized travel.

- M215, although passable, appears to be maintained solely by the passage of vehicles. This route should not be cherrystemmed out of the LWC unit.

- M401/M402 does not exist on the ground. There is no route whatsoever in this location. The route should be deleted from TMP maps and listed as closed to motorized travel.

- M209 continues north beyond the terminus of Mesa County 0 9/10 Road. This route begins as a two-track route and after only 100 yards or so disappears almost entirely. The route is clearly not maintained using mechanical means and should not be cherrystemmed out of the LWC unit. For TMP purposes the route should be closed to motorized travel and reclaimed.

- The routes around the head of Main Canyon (M406, M407, M412, M416, and M419) provide invaluable backcountry hiking and horseback riding opportunities. These routes should be closed to all motorized travel but left open to foot, horse, and bike travel. Horseman, mountain bikers, and hikers are able to co-exist on the same trail and there is no reason any of these routes should be open to only one type of these non-motorized users.

<u>Wilderness Characteristics and the BLM's Wilderness Characteristics Determinations:</u>

Because the boundaries drawn by the BLM for the Main Canyon unit contain inaccuracies, any assessment of the wilderness characteristics located within the unit is not based on full information. In fact, the Main Canyon has no qualifying boundary delineation feature separating it from either the BLM's adjacent Hunter Canyon unit or the BLM's adjacent Little Book Cliffs Wilderness Study Area—both of which have been found to contain outstanding wilderness characteristics by the BLM. Because Main Canyon is contiguous with these two units, the same wilderness characteristics identified by the BLM in Hunter Canyon and Little Book Cliffs can be assumed to exist in Main Canyon as well.

Yet, the assessment of wilderness characteristics included in the BLM's draft LWC inventory is worth commenting on in their own right. The "Summary of Findings and Conclusion" section of the BLM's draft inventory report states that the Main Canyon unit does not appear to be natural (Draft Inventory, p.128). Yet, on page 127 of the BLM's inventory, the narrative describes the unit as one that can be "considered to be in a natural state" and whose "slopes and drainages have not been manipulated by man and retain their natural state". If the area maintains its natural state, then surely it meets the criteria of possessing apparent naturalness to the casual visitor.

The BLM's draft inventory describes the opportunities for solitude in Main Canyon as not outstanding because they "pale[] in comparison to the drastic, steep cliffs the canyon assumes as it progresses towards the river [outside of the unit]" and that "[o]pportunities for solitude exist in the unit, but are not considered outstanding in a regional context" (Draft Inventory, p.127). However BLM guidance in Manual 6310 clearly states that "each area must be assessed on its own merits" and further instructs:

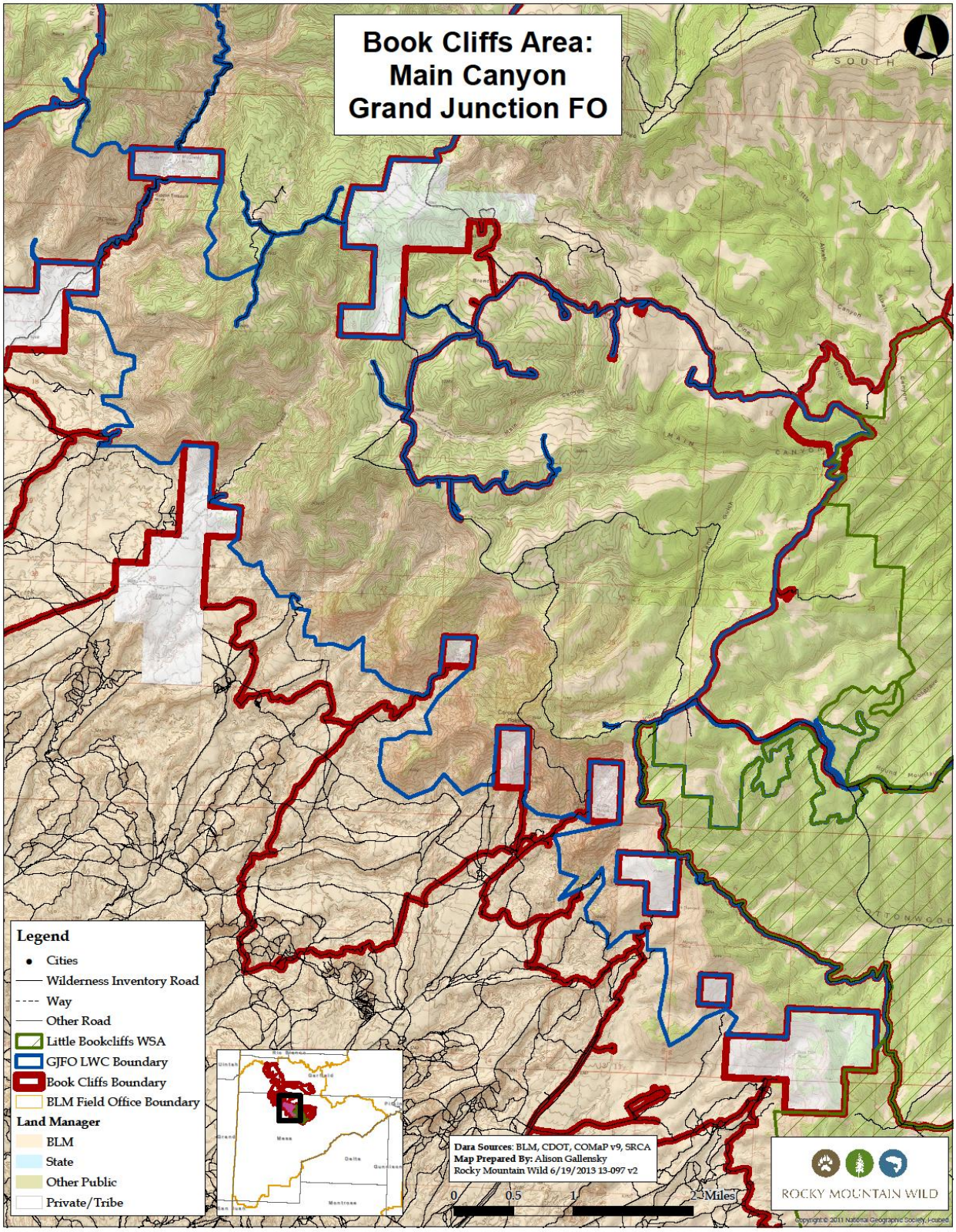
> "Do not compare the lands in question with other parcels. Do not use any type of rating system or scale—whether numerical, alphabetical, or qualitative—in making the assessment. Use professional judgment in determining whether outstanding opportunities exist in each area and document in writing the rationale for arriving at the determination." (Manual 6310, p.7)

Whether because the Main Canyon inventory was completed by BLM prior to the publication of the new BLM guidance on conducting LWC inventories, or whether it was a simple oversight, the draft inventory for the Main Canyon unit seems to compare the lands in question with other parcels outside of the unit, while also neglecting to assess the opportunities for solitude present within the unit itself; the draft inventory also fails to "document in writing the rationale for arriving at the determination". All that is provided is a subjective statement by the contractor who conducted the inventory that the Main Canyon unit's opportunities for solitude are not outstanding "in a regional context" with no further documentation or rationale given to support that claim.

The BLM's draft inventory concludes that the Main Canyon unit does not have outstanding opportunities for primitive and/or unconfined recreation. The report describes the desert portion of the unit around the start of the Bookcliffs having slopes that are "essentially not traversable" and drainages that "offer less than ideal primitive recreation opportunities" (Draft Inventory, p.127). However, while the steepest portions of the southwest faces of the Book Cliffs may not be traversable to most, the lower-lying hills, innumerable drainages and swales, and overall convoluted topography of the fronts of the Book Cliffs offers outstanding primitive recreation opportunities. In addition, the mere size of the unit itself allows for outstanding unconfined recreational opportunities. Just the large drainages at the head of Main Canyon—already popular with horseback riders and hikers—provide enough outstanding unconfined recreational opportunities to meet the criteria for the unit as a whole. In addition, the BLM's description mentions a "lack of water" as some kind of rationale for the area's supposed lack of primitive recreation opportunities. BLM Manual 6310 points out that "a lack of water is not essential for an outstanding primitive recreation opportunity" (Manual 6310, p.9)

<u>Summary and Recommendation:</u>

The area identified in the BLM's draft inventory as the Main Canyon unit is defined by boundaries that do not meet the criteria for Wilderness Inventory Roads or other qualifying boundary features. Because of this, the area analyzed in the BLM's draft inventory report is only part of the complete picture for this area. In fact, the area described by the BLM as the Main Canyon unit is actually contiguous with the Hunter Canyon unit to the west and the Little Book Cliffs WSA to the east. Because of this, the determinations made by the BLM about the Main Canyon unit's lack of outstanding opportunities for solitude and primitive and/or unconfined recreation are incorrect. The BLM must re-inventory the entire area that qualifies as a potential lands with wilderness characteristics under current BLM guidance and any determinations made in that updated inventory as to the unit's boundaries or wilderness characteristics should be fully documented with geotagged photographs, maps, and Route Analysis forms s required by BLM Manual 6310.


Book Cliffs Area:
Main Canyon
Grand Junction FO
Legend
Cities
Wilderness Inventory Road
Way
Other Road
Little Bookcliffs WSA
GJFO LWC Boundary
Book Cliffs Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/19/2013 13-097 v2
0 0.5 1 2 Miles
ROCKY MOUNTAIN WILD
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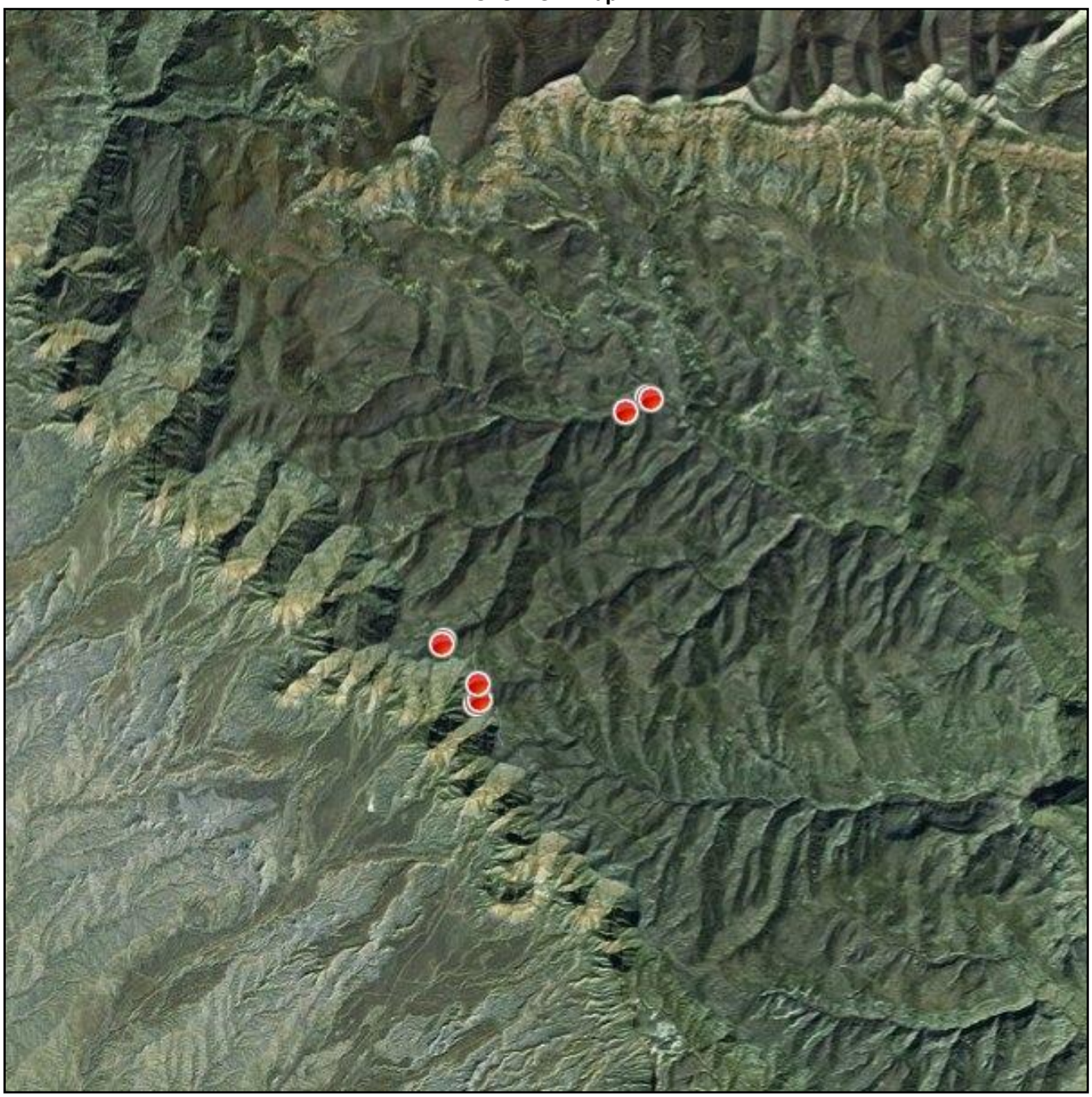
Grand Junction Book Cliffs unit: Main Canyon

The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph

Overview Map



Attributes	
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Title	
Subject	
Latitude	N 39° 14' 08"
Longitude	W 108° 30' 15"
Elevation	
Photo Direction	

1 – the vegetaion of the Main Canyon unit offers excellent screening to provide outstanding opportunites for solitude.

Title:

Attributes	
File Name	IMG_7214.JPG
Title	
Subject	
Latitude	N 39° 14' 07"
Longitude	W 108° 30' 16"
Elevation	
Photo Direction	

2 – the dramatic slopes near Corcoran Peak allow for outstanding photograph opportunities and their topmost ridges offer easy hiking with unimpeded views across the entirey of the Grand Valley.

Title:

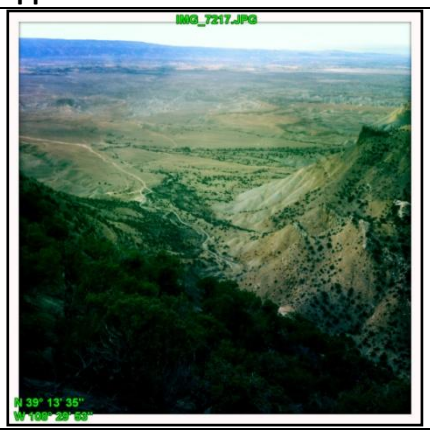
Attributes	
File Name	IMG_7215.JPG
Title	
Subject	
Latitude	N 39° 13' 35"
Longitude	W 108° 29' 52"
Elevation	
Photo Direction	

3 – views from the Main Canyon unit are world-class.

Title:

Attributes	
File Name	IMG_7217.JPG
Title	
Subject	
Latitude	N 39° 13' 35"
Longitude	W 108° 29' 53"
Elevation	
Photo Direction	

4 – the innumerable drainages pouring norh off of the Book Cliffs and into the desert offer outstanding opportunities for solitude.



Title:

Attributes	
File Name	IMG_7265.JPG
Title	
Subject	
Latitude	N 39° 13' 37"
Longitude	W 108° 29' 51"
Elevation	
Photo Direction	

5 – from the north, visitors can access the high cliffs of the Book Cliffs. These slopes offer great hiking and horseback riding along their rims, and excellent primitive campsites can be found with fantastic views to the south and east.

Title:

Attributes	
File Name	IMG_7266.JPG
Title	
Subject	
Latitude	N 39° 13' 37"
Longitude	W 108° 29' 51"
Elevation	
Photo Direction	

6 – sunset from the Book Cliffs.

Title:

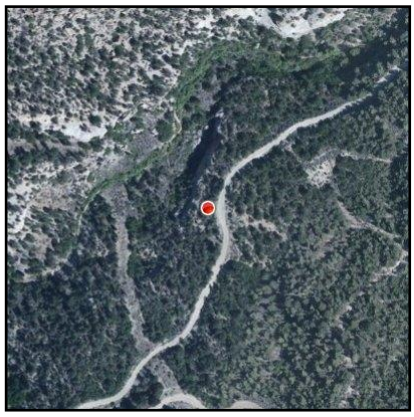
Attributes	
File Name	IMG_7271.JPG
Title	
Subject	
Latitude	N 39° 13' 45"
Longitude	W 108° 29' 52"
Elevation	
Photo Direction	

7 – the forested slopes atop the Book Cliffs offer adequate screening to provide a sense of solitude.

Title:

Attributes	
File Name	IMG_7070.JPG
Title	
Subject	
Latitude	N 39° 16' 11"
Longitude	W 108° 28' 10"
Elevation	6157 ft
Photo Direction	259° W

8 – further north in the Main Canyon unit, many deep and narrow drainages can be explored.



Title:

Attributes	
File Name	IMG_7275.JPG
Title	
Subject	
Latitude	N 39° 16' 18"
Longitude	W 108° 27' 55"
Elevation	
Photo Direction	

9 – the sandstone cliffs offer outstanding primitive recreation opportunities in the form of bouldering.

Title:

Attributes	
File Name	IMG_7276.JPG
Title	
Subject	
Latitude	N 39° 16' 18"
Longitude	W 108° 27' 55"
Elevation	
Photo Direction	

IMG_10 – sandstone geology of the Main Canyon unit.

Title:

Attributes	
File Name	IMG_7282.JPG
Title	
Subject	
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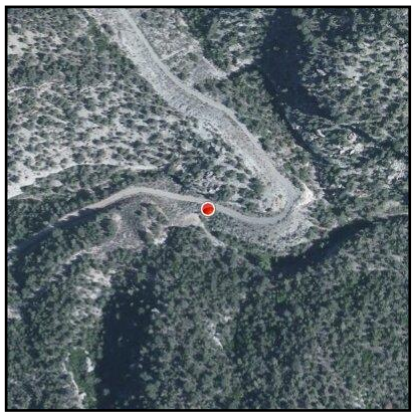
Longitude	W 108° 27' 53"
Elevation	
Photo Direction	

11 – interesting formations in the Main Canyon unit offer fun scrambling and climbing.



Title:

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File Name	IMG_1332.JPG
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Subject	
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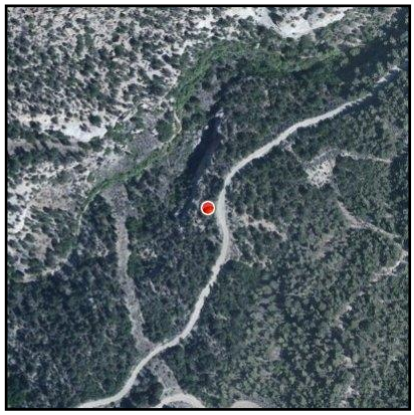
Elevation	6152 ft
Photo Direction	0° N

12 – mid-Spring in the Main Canyon unit.



Title:

Munger Creek

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Munger Creek unit as an area that could meet the criteria for lands with wilderness characteristics. Through spatial data analysis BLM identified an area of 23,801 acres to the east of Colorado highway 139 and west of Mesa/Garfield road, 16 Road and to the west of Salt Creek. The unit had not been inventoried previous to the GJFO Lands with Wilderness Character Inventory Update (2011). The GJFO inventory was conducted in 2011--prior to the release in 2012 of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands—these acres were inventoried by BLM. The result of this inventory is that while BLM found the Munger Creek unit to meets the criteria for size and naturalness it does not meet the criteria for outstanding opportunities for solitude, and outstanding opportunities for primitive recreation and unconfined recreation.

During May and June of 2013, Conservation Colorado (CC) and The Wilderness Society (TWS) visited Munger Creek to conduct an on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries for the unit met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, CC and TWS identified several minor adjustments that should be made to the BLM's boundaries for the Munger Creek unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map).

Although we agree with the BLM's findings that the Munger Creek unit has outstanding naturalness, we disagree with the finding that the area lacks solitude and outstanding opportunities for primitive and unconfined recreation. One, the area defined and analyzed in that assessment is incorrect. Without identifying the true boundaries of a potential LWC unit as defined by Manual 6310, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by

mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the boundaries BLM has proposed for the Munger Creek unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The Munger Creek unit, as defined by the BLM, is bounded by the north by private lands and H 27/H 26, H2/H9/H11 which forms a portion of the boundary between Munger Creek and East Salt Creek LWC units. To the west it is bounded by Colorado Highway 139 and private land. The eastern boundary is made up on 16 Road and H11. However, H11 is not a maintained route. This boundary does not qualify as a WIR and should be deleted which causes the northeast boundary to be moved north to H31.

The draft inventory report for the Munger Creek LWC unit states that while it contains solitude, it doesn't provide outstanding opportunities for solitude. We would disagree, despite relative ease of access, the unit's extremely rugged canyons and heavily forested slopes provides opportunities for solitude that rival anything in the GJFO. Additionally, the unit's extremely rugged nature presents difficulties for cross-country travel; its drainages---like Munger Creek---are hidden deep below the ridgelines and provide for solitude and excellent backpacking and backcountry hunting opportunities.

Additional boundary and route comments for the BLM's Lipan Wash unit:

- H11 is used by narrow motorized vehicles, primarily ATVs and motorcycles. The route, however, does not qualify as a WIR as it is not maintained using mechanical means. Correspondingly, the northeastern boundary of the unit should be moved further north to H31, which is a constructed and maintained route.
- There are also a number of routes that have been "cherry-stemmed" into the unit which don't qualify as wilderness inventory roads and should be removed from the inventory. They are: H122; H2/H10; and H21 where it turns northward and turns into H152.

<u>Summary and Recommendation:</u>

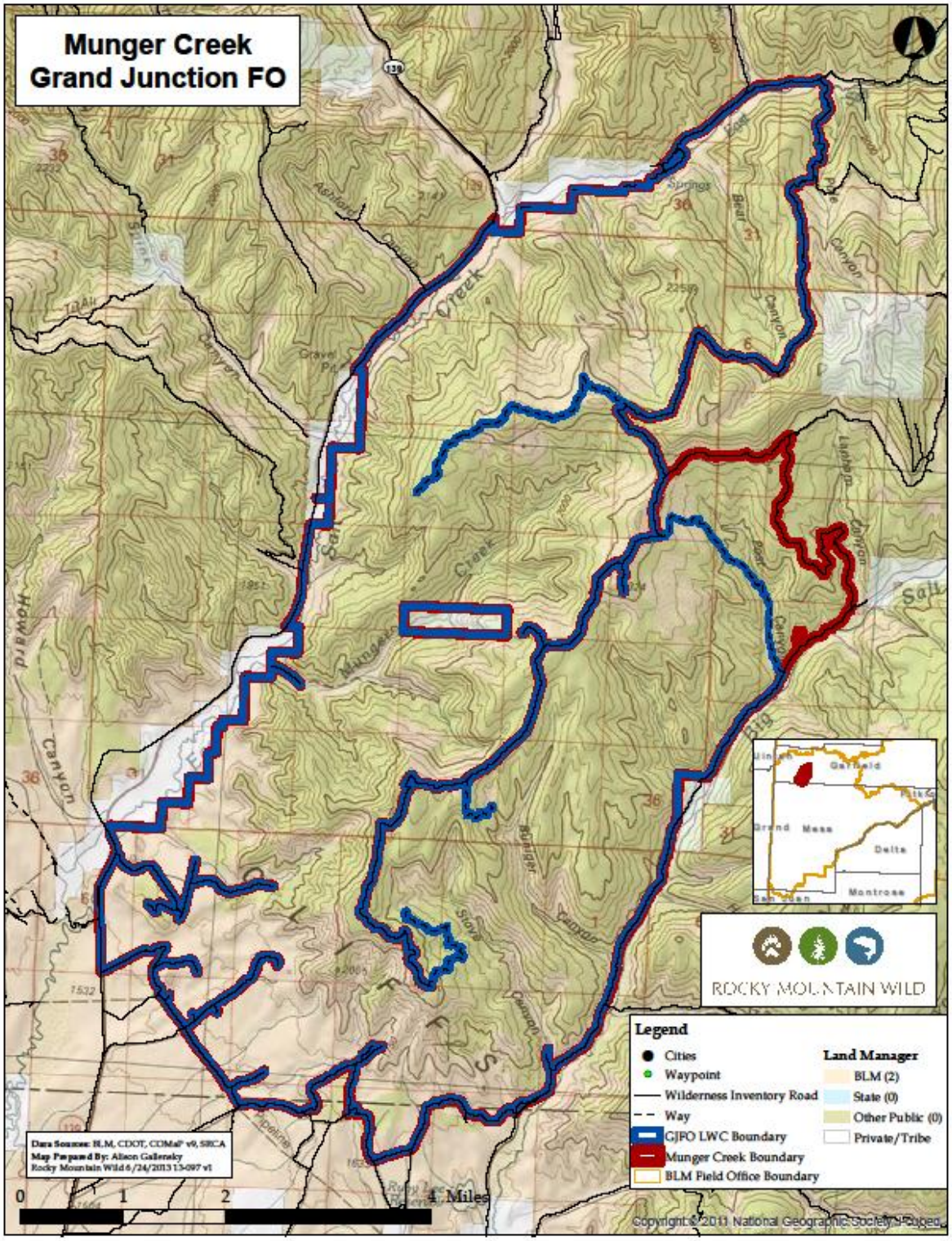
The BLM determined in their draft inventory of potential lands with wilderness characteristics that the area analyzed by BLM as the Munger Creek unit does not contain wilderness characteristics and thus does not qualify for protection as a Lands with Wilderness Character area. However, as described throughout this document, the Prairie Canyon unit analyzed by the BLM is conscribed by boundaries that do not meet the criteria for boundary delineation as defined in the BLM's own policies. Additionally, we do not agree that Prairie Canyon does not meet the criteria for solitude and outstanding opportunities for primitive and unconfined recreation. We feel that BLM erred in its' inventory, both through the boundary determinations that were made as well as the assessment of solitude and outstanding opportunities for primitive and unconfined recreation. However, regardless of those determinations, IM 2001-154 states,

> "Determine if the area has outstanding opportunities for solitude or a primitive and unconfined type of recreation. The word "or" in this sentence means that an area only has to possess one or the other. The area does not have to possess outstanding opportunities for both elements, nor

> does it need to have outstanding opportunities on every acre, even when an area is contiguous to lands with identified wilderness characteristics.

BLM provided no Route Analysis forms for the area, only four photographs detailing the topography or vegetative qualities of the area which do not illustrate the lack of outstanding opportunities for solitude or primitive and unconfined recreation.

The unit should be re-inventoried as part of an effort to update the draft GJFO Lands with Wilderness Character Inventory and any determinations made as to the wilderness characteristics found or not found therein should be documented with geotagged photographs, maps, and route analysis forms as required by BLM Manual 6310.

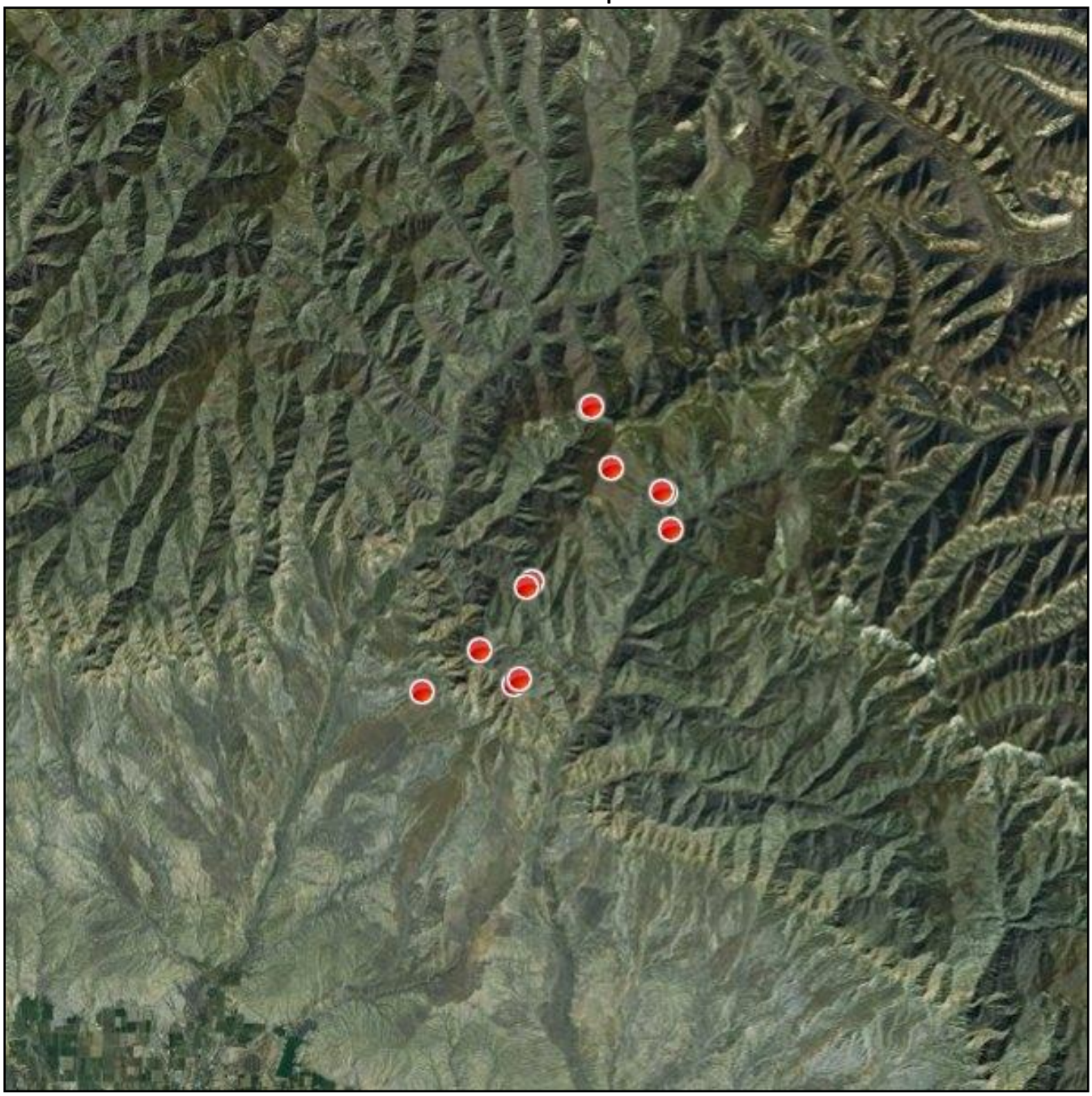

Munger Creek
Grand Junction FO
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
GJFO LWC Boundary
Munger Creek Boundary
BLM Field Office Boundary
Land Manager
BLM (2)
State (0)
Other Public (0)
Private/Tribe
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/24/2013 13-097 v1
0
1
2
4 Miles
Copyright © 2011 National Geographic Society, i-cubed

rds

Munger Creek Photopoints

The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph

Overview Map



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Elevation	5012 ft
Photo Direction	65° ENE

P1-

Photo 1

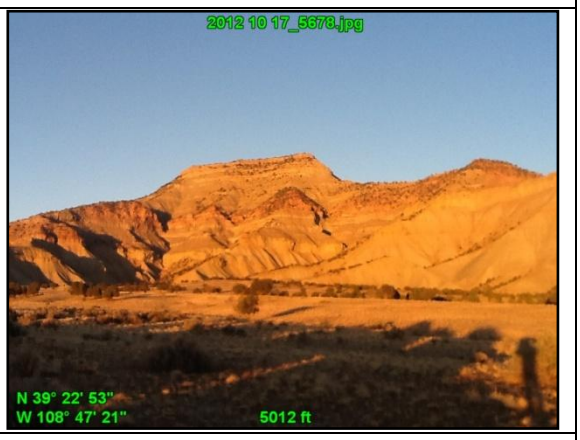

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Photo Direction	49° NE

Photo 2

Title:

Attributes	
File Name	2012 11 07_5765.jpg
Title	
Subject	
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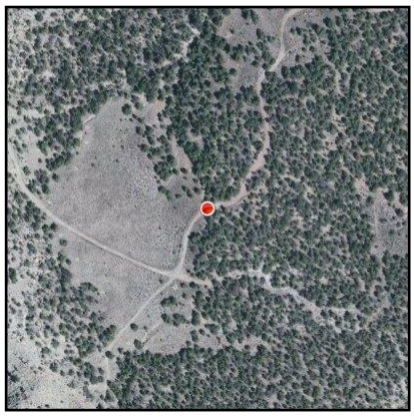
Longitude	W 108° 45' 16"
Elevation	3525 ft
Photo Direction	0° N

Photo 3



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Longitude	W 108° 45' 08"
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Photo Direction	0° N

Photo 4

Title:

Attributes	
File Name	IMG_0856.JPG
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Subject	
Latitude	N 39° 23' 38"
Longitude	W 108° 46' 02"
Elevation	3685 ft
Photo Direction	17° NNE

Photo 5

Title:

Attributes	
File Name	IMG_0859.JPG
Title	
Subject	
Latitude	N 39° 24' 45"
Longitude	W 108° 44' 57"
Elevation	7119 ft
Photo Direction	44° NE

Photo 6

Title:

Attributes	
File Name	868.JPG
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Subject	
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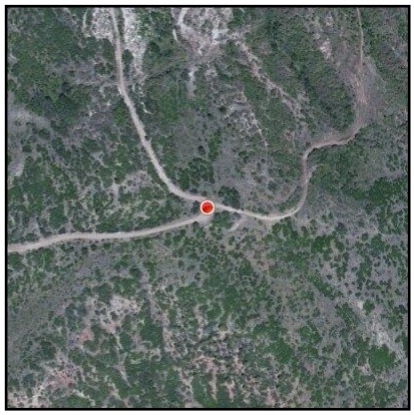
Longitude	W 108° 42' 59"
Elevation	7469 ft
Photo Direction	99° E

Photo 7



Title:

Attributes	
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Title	
Subject	
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Longitude	W 108° 41' 38"
Elevation	5968 ft
Photo Direction	0° N

P.8-Post Canyon or H11 shows evidence of use and construction, but no evidence of Maintenance.

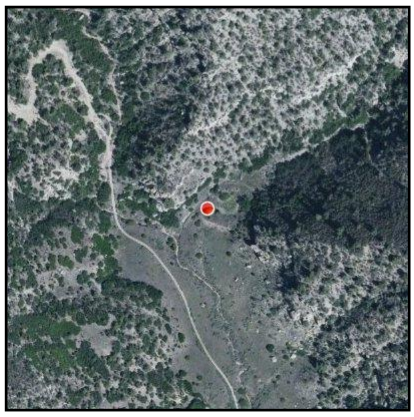
Photo 8

Title:

Attributes	
File Name	IMG_0008.JPG
Title	
Subject	
Latitude	N 39° 26' 25"
Longitude	W 108° 41' 46"
Elevation	6043 ft
Photo Direction	0° N

P.9- Old stock pond/impoundment. Reveget-ated and human disturbance substantially unnoticeable.

Photo 9



Title:

Attributes	
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Title	
Subject	
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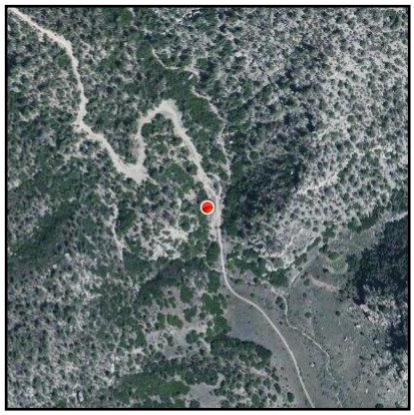
Elevation	6109 ft
Photo Direction	0° N

P.10-User created route on H11, no evidence of maintenance.

Photo 10



Title:

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Photo Direction	0° N

P.11- Dramatic vistas and substantial vegetation provide screening and opportunities for solitude

Photo 11

Title:

Attributes	
File Name	IMG_0017.JPG
Title	
Subject	
Latitude	N 39° 27' 58"
Longitude	W 108° 43' 26"
Elevation	7428 ft
Photo Direction	0° N

P.12-Route H2, shows no evidence of maintenance and little use.

Photo 12

Title:

Prairie Canyon

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Prairie Canyon unit as an area that could meet the criteria for lands with wilderness characteristics. Through spatial data analysis and an existing citizen's wilderness proposal the BLM identified an area of approximately 17,569 acres on the east and west side of Prairie Canyon Road. The previously submitted citizens' wilderness proposal also identified lands in the Hell's Hole Unit in the Moab Field Office in Utah, which was found to have wilderness character. The western portion of the unit in Utah was also inventoried in 1979 as part of an accelerated review around an oil and gas conflict. The GJFO inventory was conducted in 2011--prior to the release in 2012 of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands—these acres were inventoried by BLM. The result of this inventory is that while BLM found the Prairie Canyon unit to meets the criteria for size and naturalness it does not meet the criteria for outstanding opportunities for solitude, and outstanding opportunities for primitive recreation and unconfined recreation.

During May and June of 2013, Conservation Colorado ("CC") visited Prairie Canyon to conduct an on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries for the unit met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, CC identified several minor adjustments that should be made to the BLM's boundaries for the Prairie Canyon unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map).

Although we agree with the BLM's findings that the Prairie Canyon unit has outstanding naturalness, we disagree with the finding that the area lacks solitude and outstanding opportunities for primitive and unconfined recreation. One, the area defined and analyzed in that assessment is incorrect. Without identifying the true boundaries of a potential LWC unit as defined by Manual 6310, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness

Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the boundaries BLM has proposed for the Prairie Canyon unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The Prairie Canyon unit, as defined by the BLM, is bounded by the north by private lands and a pipeline right-of-way (ROW). However, the ROW is unnoticeable and should not be used as a delineated boundary.

On the southern boundary of the unit, the BLM uses another pipeline corridor between Salt Creek and Prairie Canton Road. However, CC's on-the-ground inventory turned up no discernible evidence of a pipeline ROW deserving of a boundary and therefore the southern boundary where it meets Prairie Canyon Road should be adjusted south.

The draft inventory report for the Prairie Canyon LWC unit states "topography and vegetative screening in general permits views into canyons, onto ridges and along canyon bottoms and ridge tops. Opportunities for solitude are characteristic of the Bookcliffs region and are therefore not outstanding." We disagree with that assessment. Outside of the immediate vicinity of Prairie Canyon Road, much of the unit is hidden from any sign of humans, particularly on the western half of the unit. Large stands of coniferous trees and brush combined in varied topography allow visitors to escape the sights and sounds of man and the oil and gas development in the general vicinity is limited in scope and relegated to a small handful of canyons.

Likewise, we disagree with the BLM assessment that outstanding opportunities for primitive and unconfined recreation. The Prairie Canyon LWC unit inventory report states the "…deep canyons, steep walls and split configuration surrounded by roads make movement in the unit difficult and inhibit travel throughout the unit." We find that rather than limiting primitive recreation, the split configuration of the units enhances it by providing relatively easy vehicular access and creating numerous "jumping off" points of access that enables users to explore the hard to reach recesses of the unit via back-country day trips as well as allowing for multi-day hiking with shuttle options.

<u>Summary and Recommendation:</u>

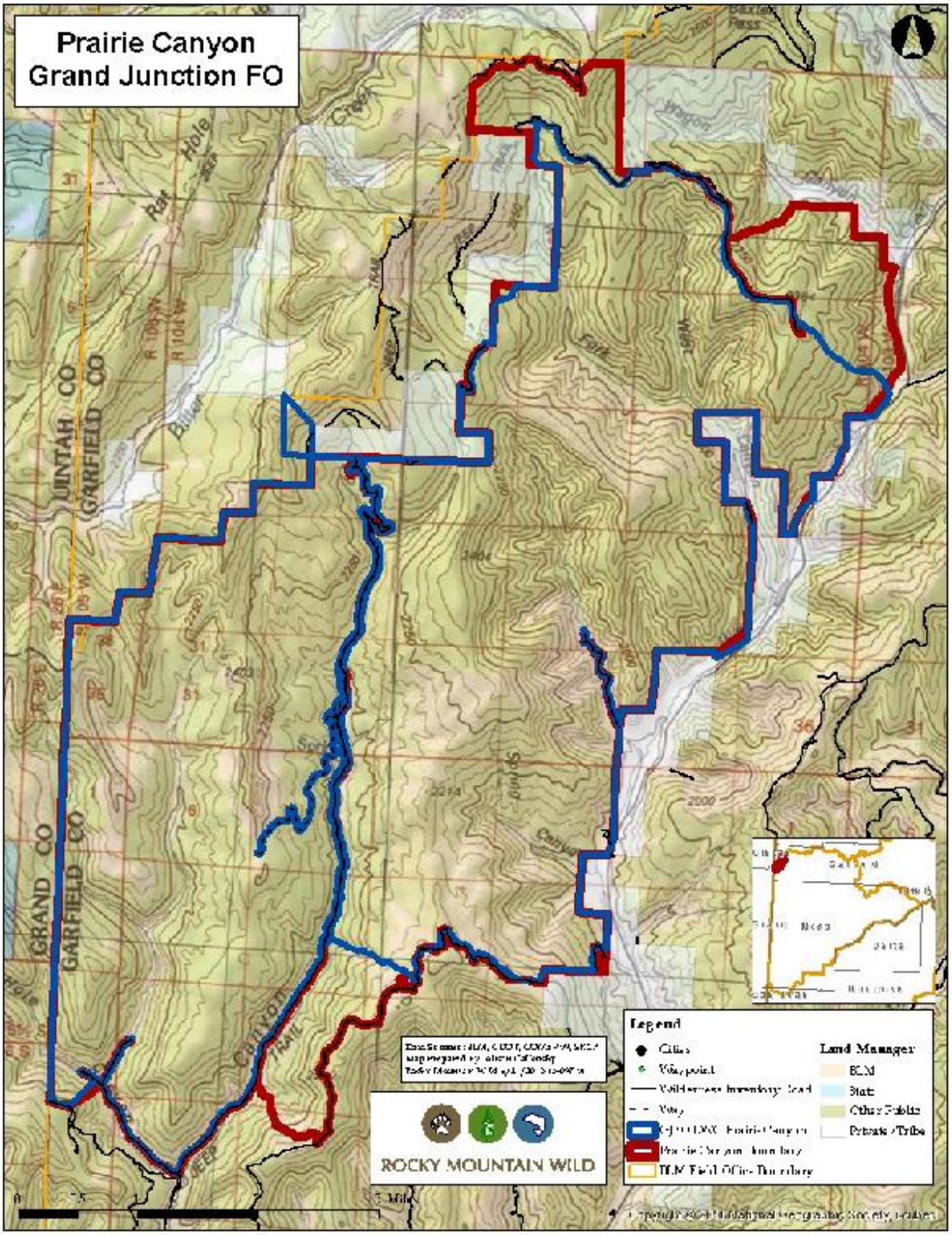
The BLM determined in their draft inventory of potential lands with wilderness characteristics that the area analyzed by BLM as the Prairie Canyon unit does not contain wilderness characteristics and thus does not qualify for protection as a Lands with Wilderness Character area. However, as described throughout this document, the Prairie Canyon unit analyzed by the BLM is conscribed by boundaries that do not meet the criteria for boundary delineation as defined in the BLM's own policies. Additionally, we do not agree that Prairie Canyon does not meet the criteria for a Lands with Wilderness Character Area. We feel that BLM erred in its' inventory, both through the boundary determinations that were made as well as the assessment of solitude and outstanding opportunities for primitive and unconfined recreation. However, regardless of those determinations, IM 2001-154 states,

> "Determine if the area has outstanding opportunities for solitude or a primitive and unconfined type of recreation. The word "or" in this sentence means that an area only has to possess one or

> the other. The area does not have to possess outstanding opportunities for both elements, nor does it need to have outstanding opportunities on every acre, even when an area is contiguous to lands with identified wilderness characteristics.

BLM provided no Route Analysis forms for the area, no photographs detailing the topography or vegetative qualities of the area and failed to address Supplemental Values under the guise that "No supplemental values are discussed as the unit was found to lack outstanding opportunities for solitude and/or primitive and unconfined recreation."

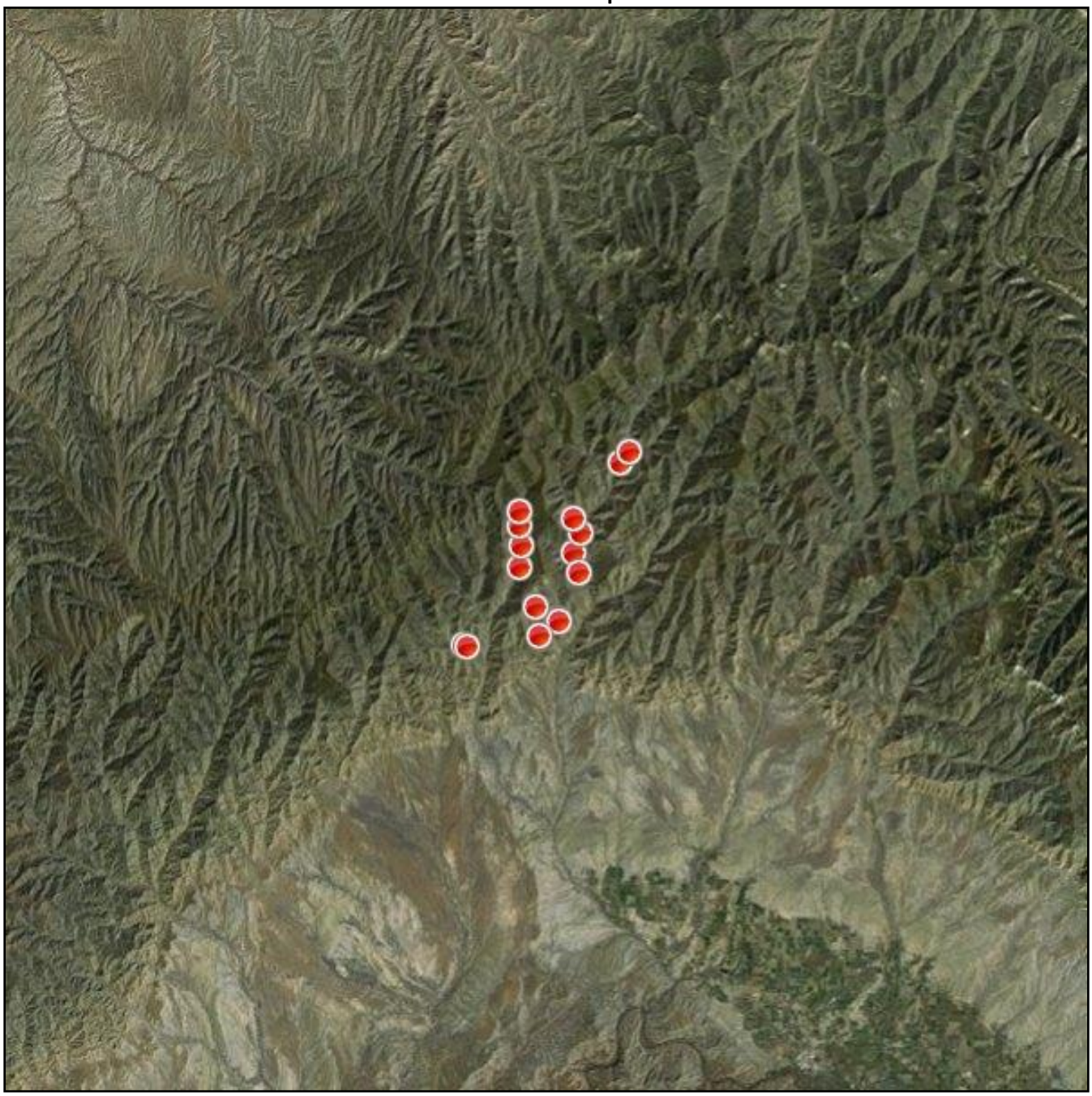
The unit should be re-inventoried as part of an effort to update the draft GJFO Lands with Wilderness Character Inventory and any determinations made as to the wilderness characteristics found or not found therein should be documented with geotagged photographs, maps, and route analysis forms as required by BLM Manual 6310.


Prairie Canyon
Grand Junction FO
UINTAH CO
GARFIELD CO
GRAND CO
GARFIELD CO
Rat Hole
Creek
Wagon
Fork
Canyon
Canyon
Trail
Deep
Hole
Legend
Cities
Land Manager
BLM
State
Other Public
Private / Tribe
ROCKY MOUNTAIN WILD

Prairie Canyon Unit

The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph

Overview Map



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Title	
Subject	
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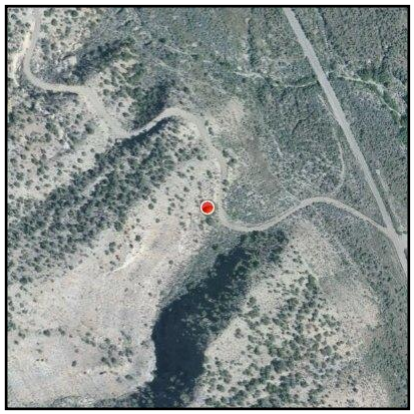
Longitude	W 108° 57' 44"
Elevation	5558 ft
Photo Direction	341° NNW

P.1- Southeast boundary of Prairie Canyon unit. Locked and gated road that does Not qualify as a LWC inventory road.

Photo 1



Title:

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Longitude	W 109° 00' 34"
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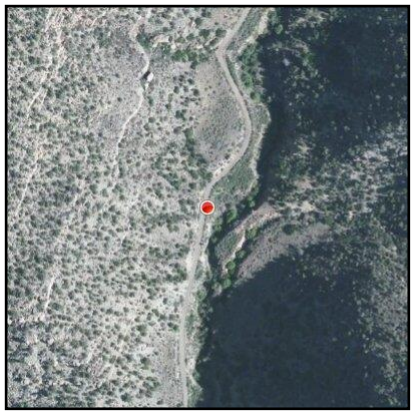
P.2-Looking east from Prairie Canyon Road at southern boundary. No evidence of pipeline ROW or any other boundary delineation.

Photo 2



Title:

Attributes	
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Title	
Subject	
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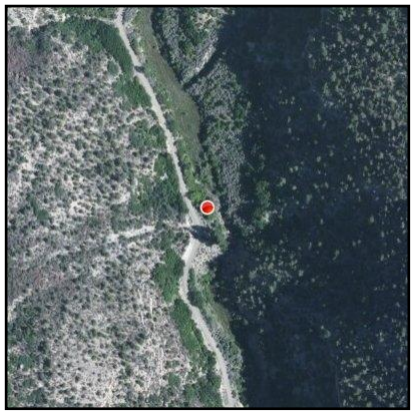
Elevation	6259 ft
Photo Direction	337° NNW

P.3-Throughout the unit old-growth Douglas firs and other substantial vegetation provide excellent screening.

Photo 3



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Elevation	6430 ft
Photo Direction	349° N

P.4-Spur route off Prairie Canyon Road shows no evidence of maintenance or use.

Photo 4

Title:

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File Name	IMG_0036.JPG
Title	
Subject	
Latitude	N 39° 29' 58"
Longitude	W 109° 00' 32"
Elevation	6538 ft
Photo Direction	338° NNW

P.5-Wire gate across Prairie Canyon Road coupled with lack of public access roads from the north provides substantial solitude for visitors.

Photo 5

Title:

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File Name	IMG_20130604_102447.jpg
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Subject	
Latitude	N 39° 28' 28"
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Photo Direction	

P.6 – Scenic picture showing natural character of Prairie Canyon unit from Baxter Pass Rd.

IMG_20130604_102447.jpg

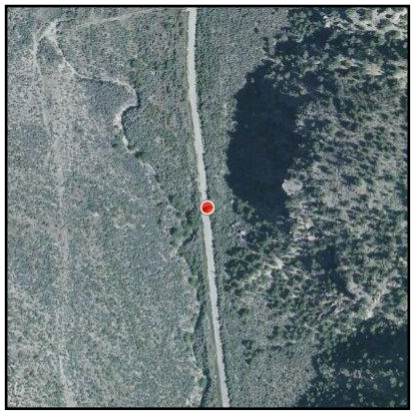

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Photo Direction	

P.7 - Scenic picture showing natural character of Prairie Canyon unit from Baxter Pass Rd.

IMG_20130604_103154.jpg

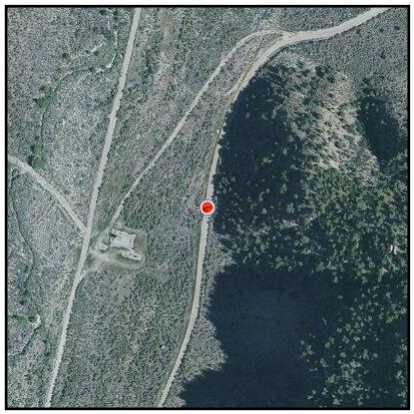

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Photo Direction	W

P.8 – Scenic picture showing natural character of Prairie Canyon unit from Baxter Pass Rd.

IMG_20130604_105354.jpg

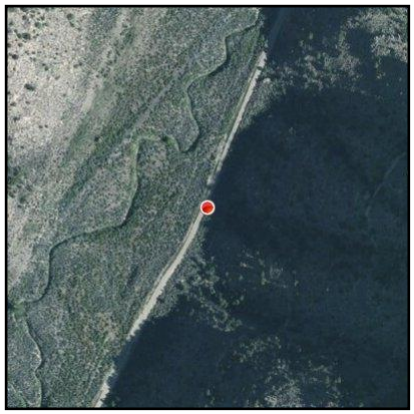

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Photo Direction	NW

P.9 - Looking northwest at boundary to unit that follows imaginary line up ridge to ridge top route.

IMG_20130604_105720.jpg

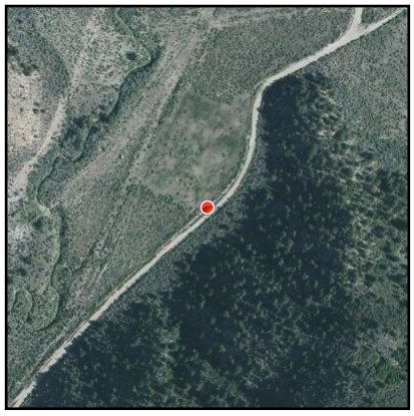

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Photo Direction	

IMG_20130604_123815.jpg

Title:

Sewemup Mesa

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Sewemup Mesa unit as an area that could meet the criteria for lands with wilderness characteristics. Through spatial data analysis, the BLM identified an area of approximately 23,600 acres around Sewemup Mesa that could qualify as a Lands with Wilderness Characteristics. In 2011—prior to the release in 2012 of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands—these acres were inventoried by BLM.

During April and June of 2013, The Wilderness Society and Conservation Colorado visited Sewemup Mesa to conduct an in-depth, on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

The BLM concluded in its inventory that the Sewemup Mesa unit did not meet the criteria for naturalness because of the "human imprints" atop the mesa. The BLM went out to say that "cherry-stemming would basically preclude all but the steep sides of the canyon for inventory" (Draft Inventory, p.164). However, no documentation is provided by BLM in its report showing exactly where these impacts are or how they either individually or collectively degrade the naturalness of the mesa top. The BLM provides no Route Analysis forms in its inventory and only three photographs are included, all three taken from a very small corner of the unit; the rest of the unit is left un-inventoried and undocumented.

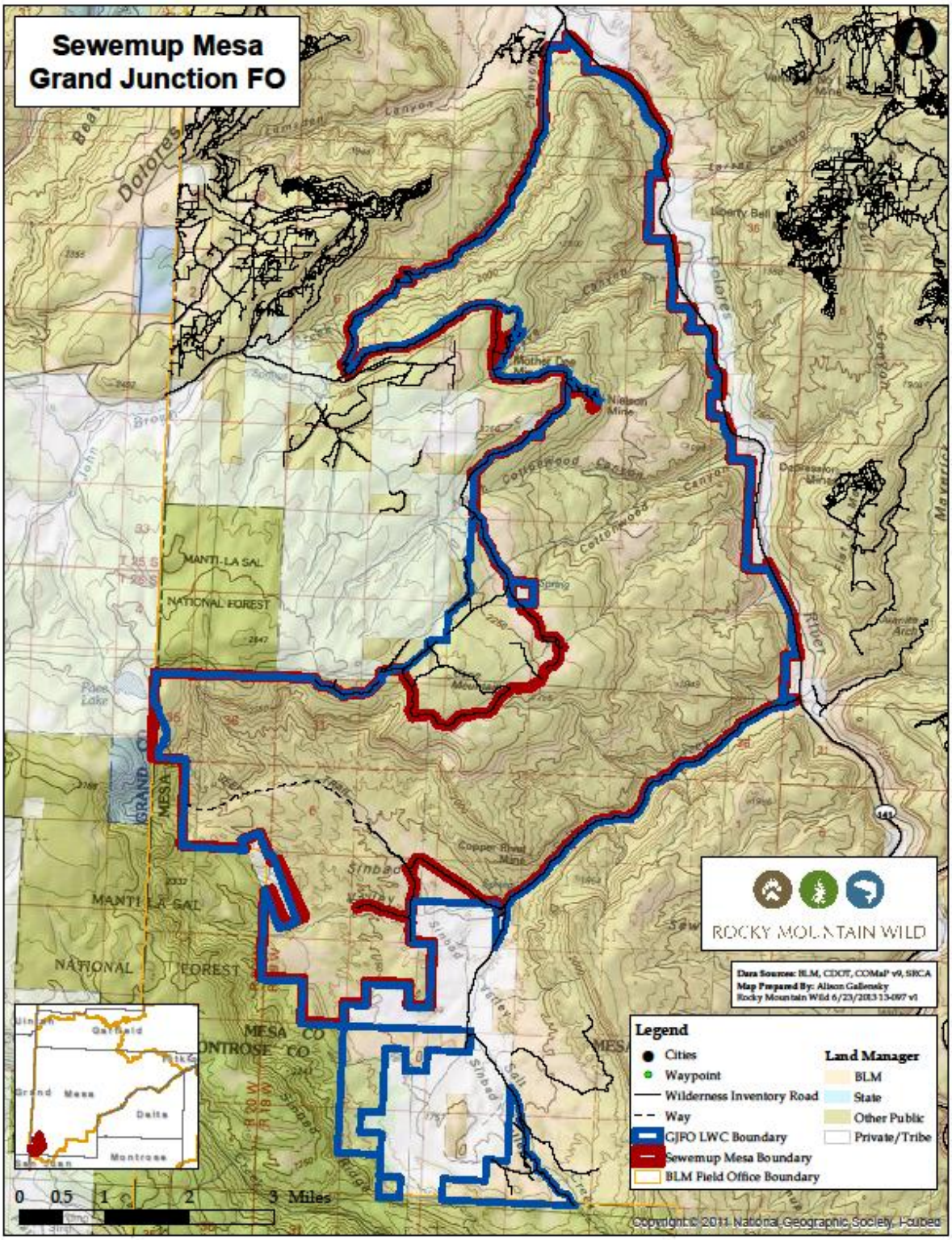
Our inventory of the area shows that a roadless area with wilderness characteristics can be found combining: lands on the mesa top where WIRs do not exist or where the concentration of the routes are not collectively substantially noticeable; the "steep sides" of the mesa including the numerous canyons and draws that peel down off of the mesa top towards the Dolores River and Salt Creek; and the northwestern portion of the Sinbad Valley, where the single route up the valley does not qualify as a Wilderness Inventory Road and thus should not be used for boundary delineation purposes.

A map and photosheet is included in this report which shows the area qualifying for LWC consideration.

Because BLM did not accurately define the true boundaries of the potential LWC unit Sewemup Mesa, any determination of the wilderness characteristics, or any management decisions based on these determinations, are not based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

Summary and Recommendation:

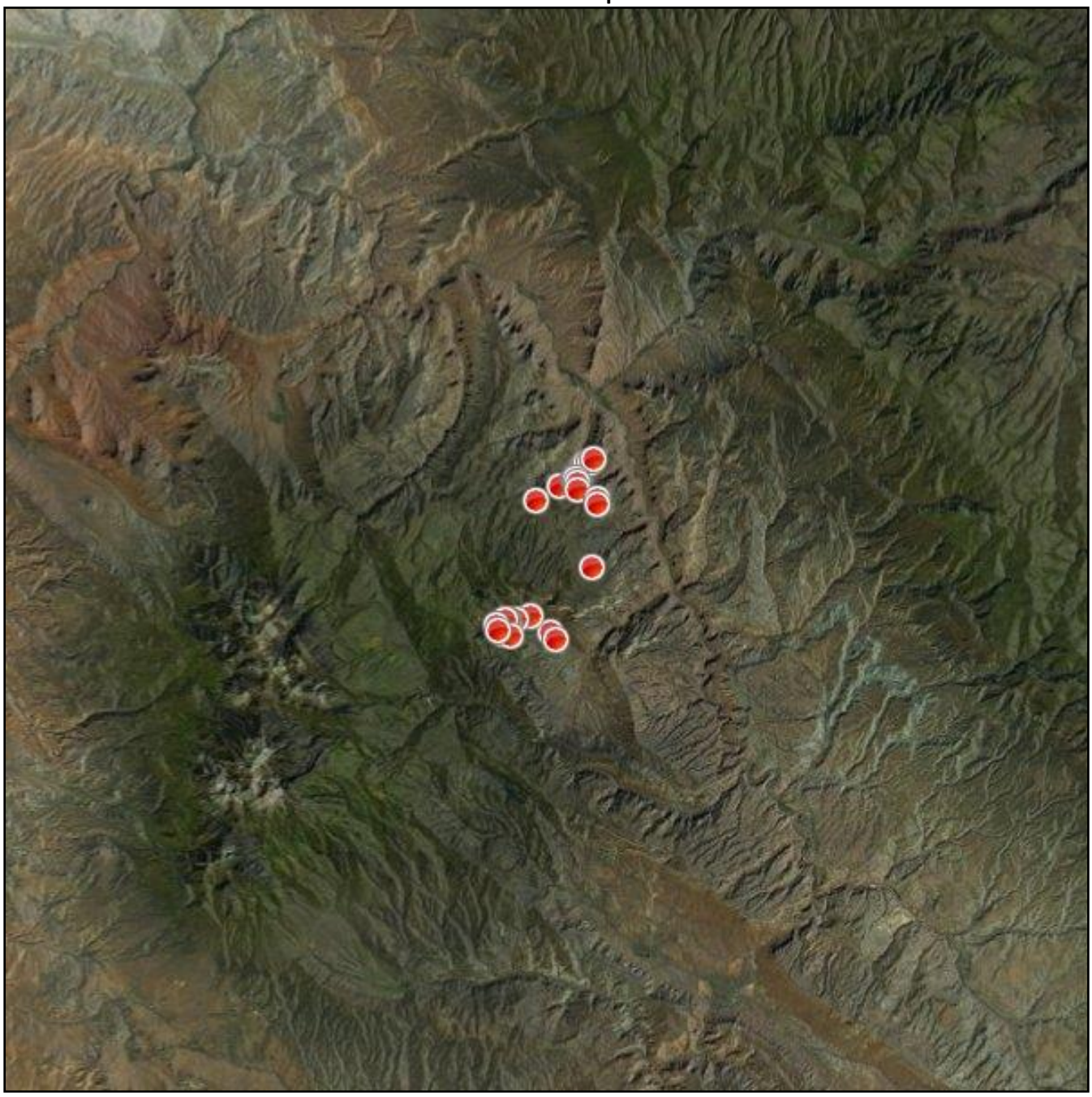
The area identified in the BLM's draft inventory as the Sewemup Mesa unit is defined by boundaries that do not meet the criteria for Wilderness Inventory Roads or other qualifying boundary features. Because of this, the area analyzed in the BLM's draft inventory report is incomplete. Because of this, the determinations made by the BLM about the Sewemup Mesa unit's lack of outstanding opportunities for solitude and primitive and/or unconfined recreation are incorrect. The BLM must re-inventory the limited area that qualifies as a potential lands with wilderness characteristics under current BLM guidance and any determinations made in that updated inventory as to the unit's boundaries or wilderness characteristics should be fully documented with geotagged photographs, maps, and Route Analysis forms s required by BLM Manual 6310.


Sewemup Mesa
Grand Junction FO
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/23/2013 13-097 v1
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
GJFO LWC Boundary
Sewemup Mesa Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
0 0.5 1 2 3 Miles
MANTI-LA SAL
NATIONAL FOREST
GRAND MESA
MESA CO
MONTROSE CO
Copyright © 2011 National Geographic Society, Footed

Sewemup Mesa Photopoints

The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph

Overview Map



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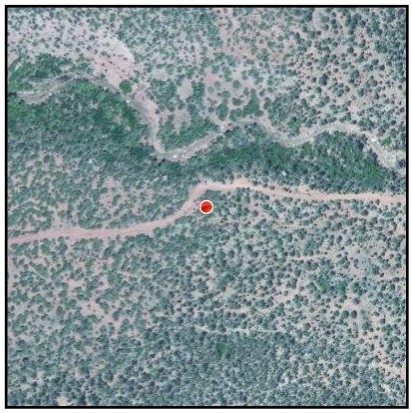
IMG_1094.JPG



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IMG_1096.JPG

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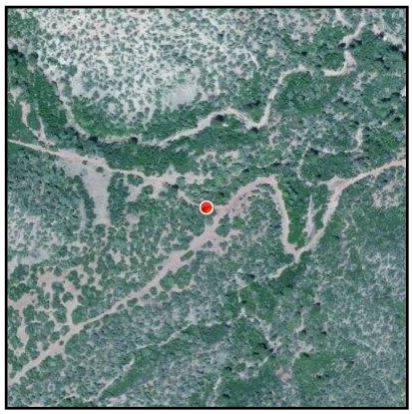
IMG_1098.JPG



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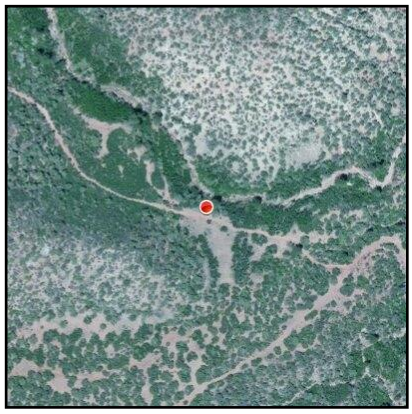
IMG_1099.JPG



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IMG_1100.JPG

Title:

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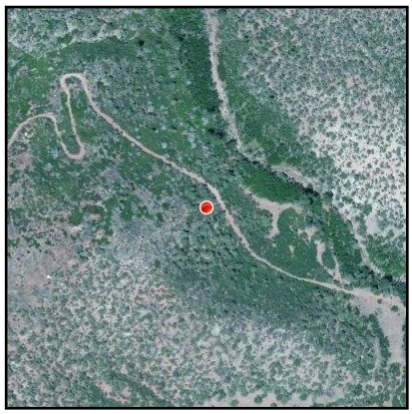

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IMG_1103.JPG

Title:

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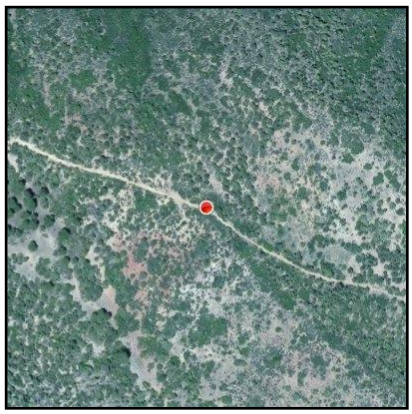
IMG_1105.JPG



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IMG_1106.JPG

Title:

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Elevation	
Photo Direction	

IMG_20130602_172855.jpg

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Photo Direction	

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Elevation	
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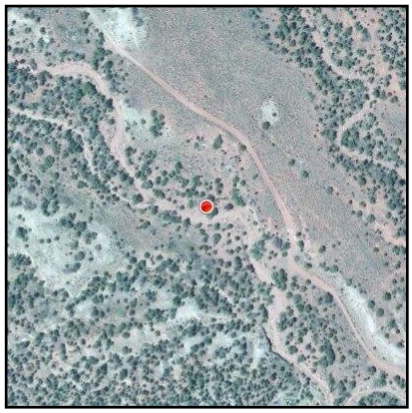
sinbad2.jpg



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IMG_9508.jpg

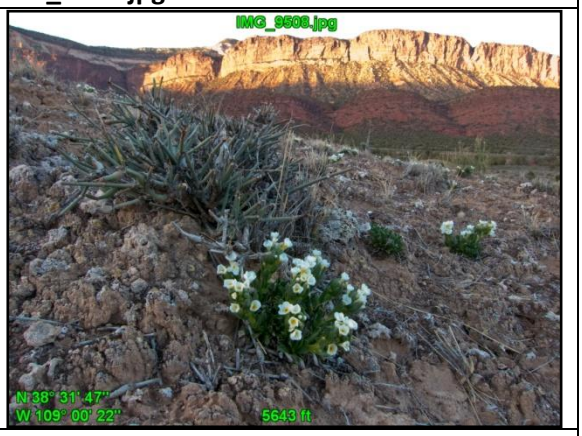

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Photo Direction	

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Photo Direction	

IMG_20130602_174247.jpg

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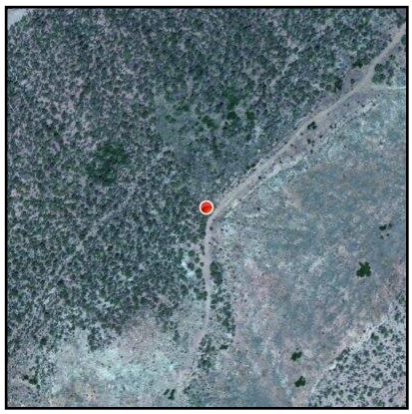

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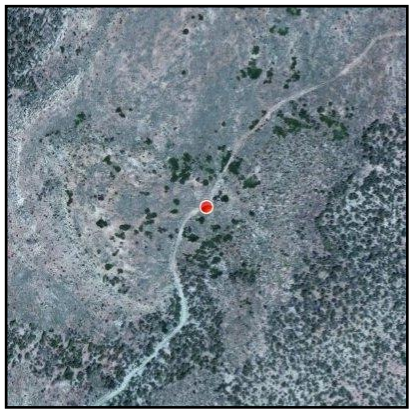

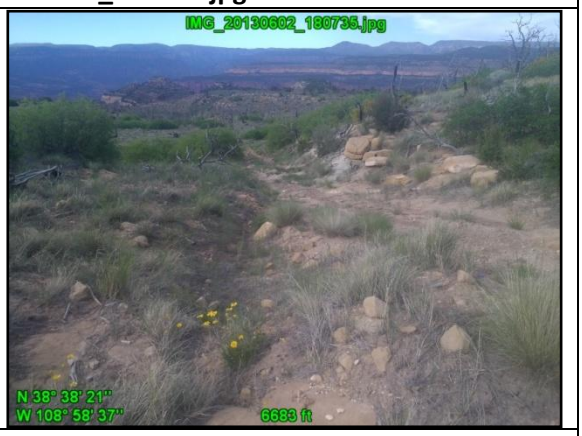

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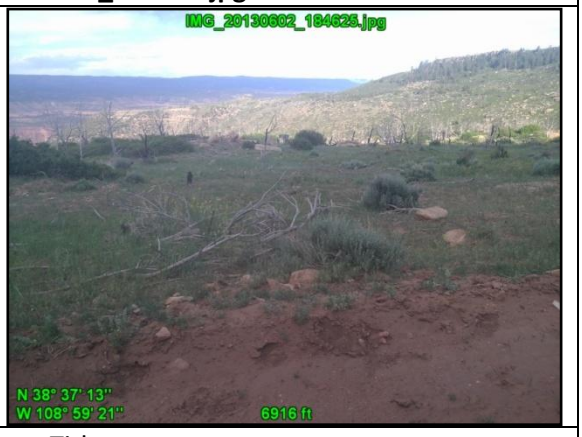

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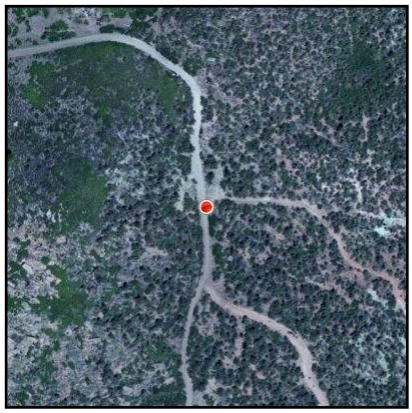

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IMG_20130602_195302.jpg

Title:

South Shale Ridge

Summary and Wilderness Characteristics Determinations:
The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the South Shale Ridge unit as an area that meets the criteria for lands with wilderness characteristics. South Shale Ridge has long been a Citizen Proposed Wilderness Area, included in Rep. Diana DeGette's Colorado Wilderness Act (to be reintroduced in June 2013). BLM identified an area of 27,540 acres based on the 1999 inventory and the CWP —prior to the release of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands. The result of this inventory was that BLM found the South Shale Ridge unit to possess wilderness characteristics. The DEIS contemplates managing for protecting wilderness characteristics in Alternative C and we fully support this alternative.

ACEC and other resource considerations (supplemental values):
The LWC inventory report hails South Shale Ridge as a botanist's dream of rare plants and the preponderance of cultural resources identified in the area warrant special management attention. In addition to LWC designation, we urge BLM to designate an ACEC to protect plant and cultural resources. Any designation of routes in or immediately adjacent to South Shale Ridge should be preceded by full cultural site inventories and clearances.

Travel Management Comment:
Coon Hollow route must not be designated beyond existing accepted wilderness inventory cherry stem. This includes routes F196 and its spurs F174, F176 & F172. Should be closed and rehabbed to protect wilderness values and cultural resources. These routes may indicate "Jeep Trail" on USGS quads, but on the ground only evidence occasional ATV use and are not wide enough to accommodate full sized vehicles. We reject the notion that the F196 route and spurs are a high value Jeep trail (as has been asserted by the OHV community). Though there may have been a jeep trail there at one time (as depicted on 1:24,000 USGS maps), our photos demonstrate that this is not the case now.

Coon Hollow cherry stem routes should be reworked to reflect on-the-ground realities and manageability. Several severe wash outs of Coon Hollow have changed the nature of the route and impede the ability for most motor vehicles to reach even the end of F195. User-created re-routes can damage the land and unidentified cultural resources. Should be closed to motorized vehicles at proposed Alt B end of F655. F195 and its spurs F189, F188, F182, F183, F184, F185. F187, F181 & F180 should be closed and rehabbed. Alternatively F195 could be closed except for admin use as depicted in Alt C with all its spurs closed and rehabbed. (See map for recommended boundary change to this LWC).

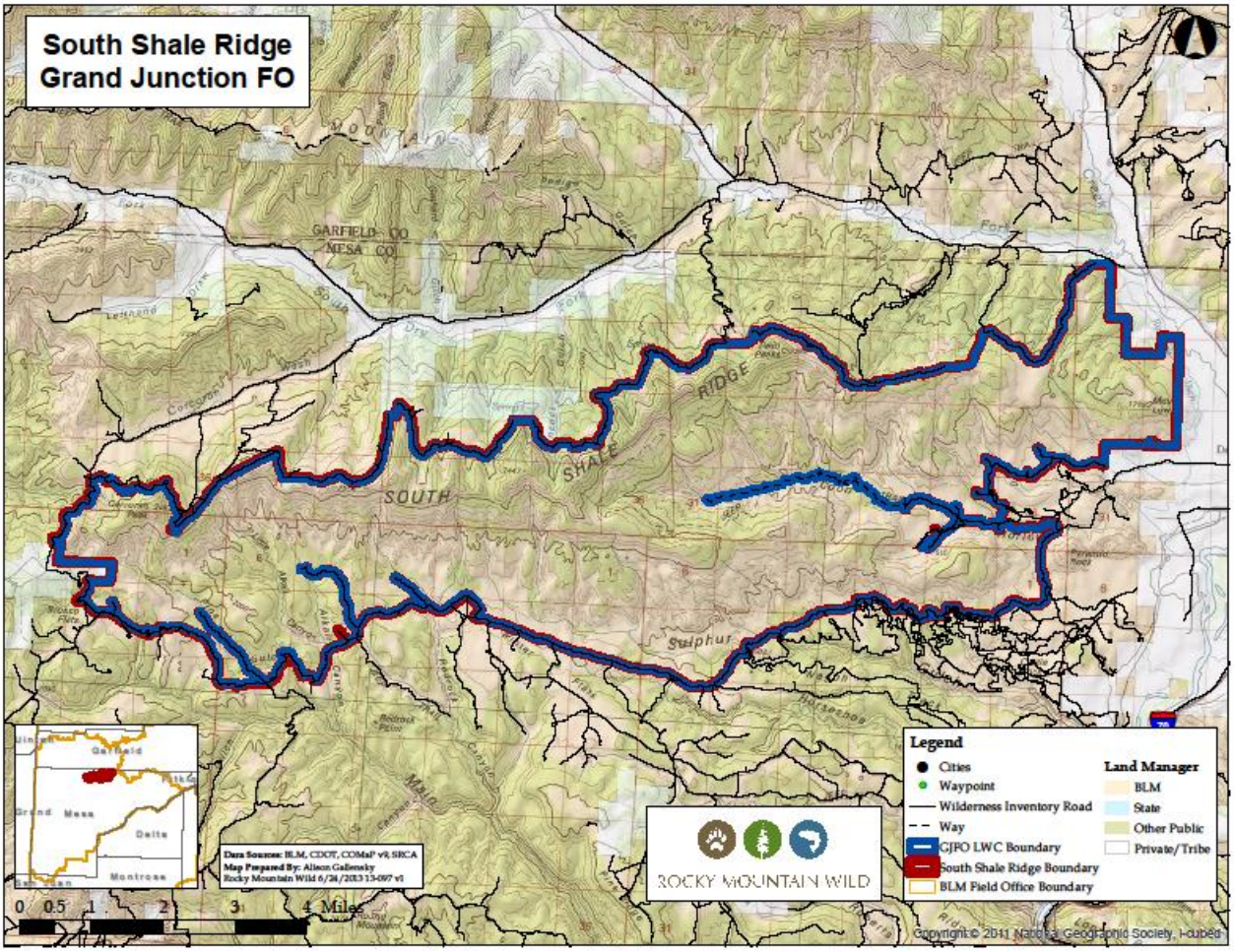
Routes F556 and F555 are undetectable by foot on the ground (see photos). They should not be designated open, and should be closed as contemplated in Alt C.

Oil and gas leasing:
The wilderness characteristics inventory report says that the unit is 100% leased, though actually these leases are all suspended after the IBLA ruled that the leases could not be issued. BLM should take the RMP as opportunity to determine the final disposition of and release suspended oil and gas leases overlaying South Shale Ridge.

Summary and Recommendation:

The South Shale Ridge unit meets all the criteria for wilderness characteristics as recognized by the BLM. This is a high priorty landscape for the conservation community, and this is evidenced by the history of this unit as CWP as well as numerous efforts to protect this landscape (e.g. IBLA appeal on leasing). We categorically oppose designation of routes beyond the establish Coon Hollow cherry stem, and in fact recommend BLM rework the cherry stem route to reflect realities on the ground and to protect cultural resources and rare plants. We reject the notion that the F196 route and spurs are a high value Jeep trail (as has been asserted by the OHV community). Though there may have been a jeep trail there at one time (as depicted on 1:24,000 USGS maps), our photos demonstrate that this is not the case now.

We strongly urge BLM to manage SSR as an LWC and ACEC to protect its wilderness, cultural and rare plant community resources.



South Shale Ridge Photopoints

The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph

Overview Map

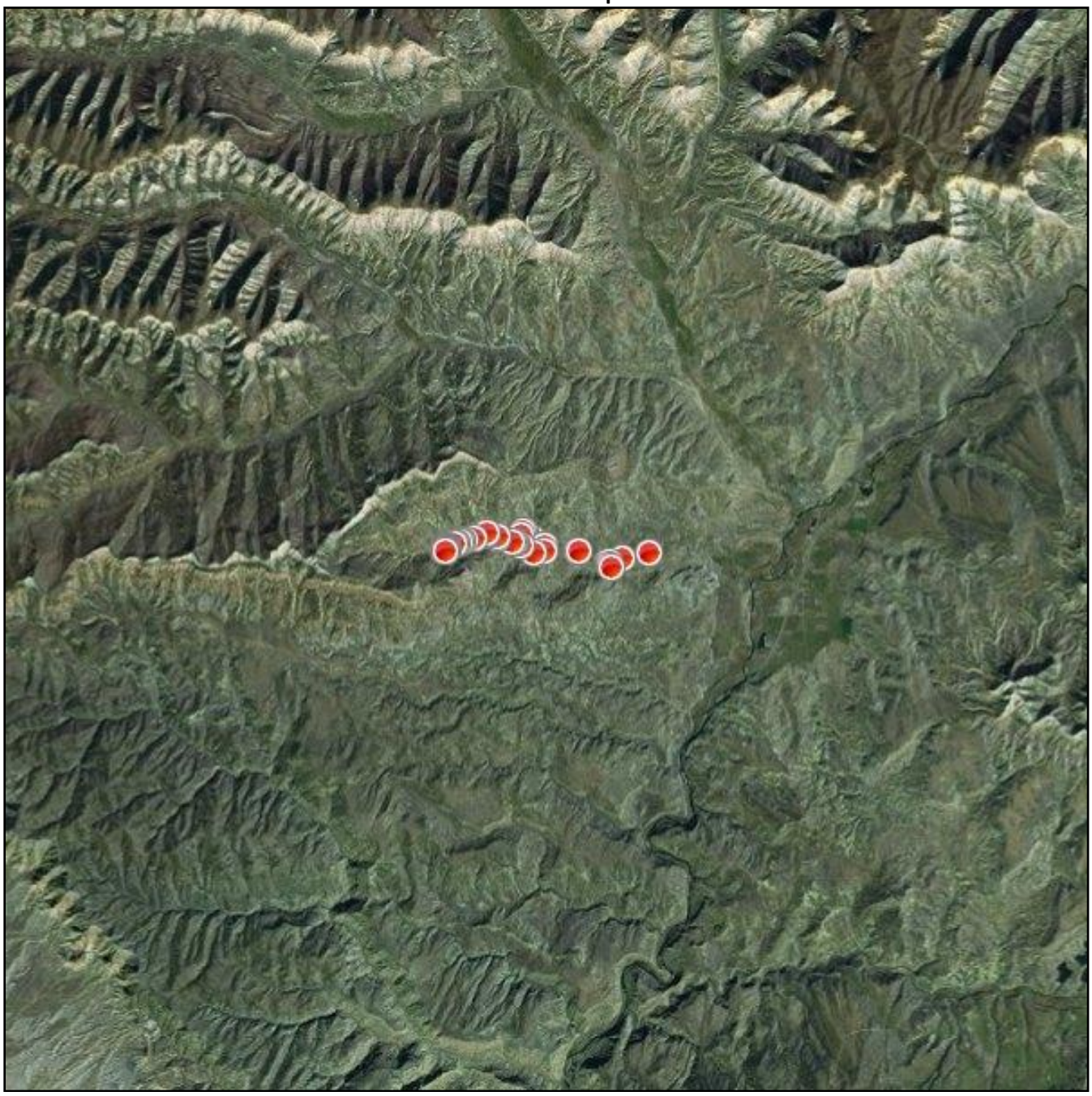


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Photo Direction	

DSC_2297.jpg

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DSC_2300.jpg

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DSC_5611.jpg

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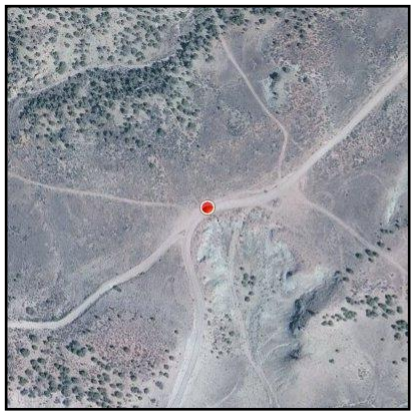

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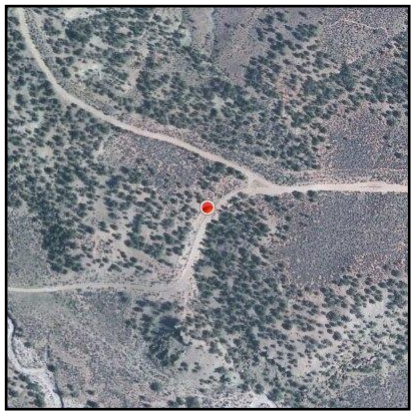

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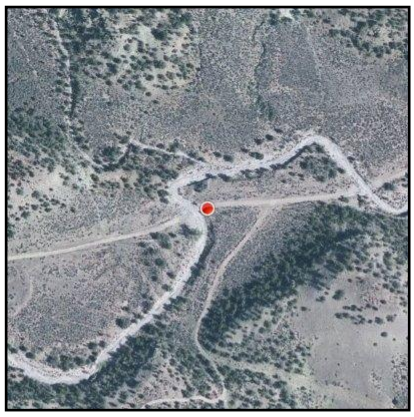

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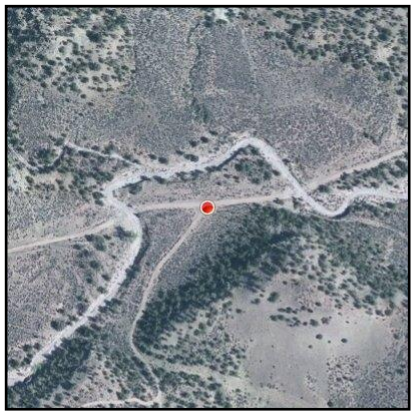

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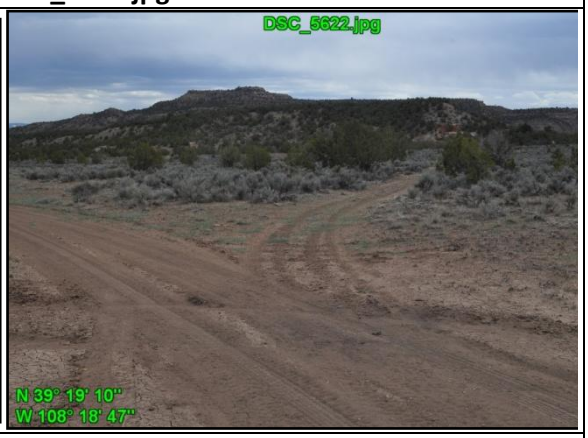

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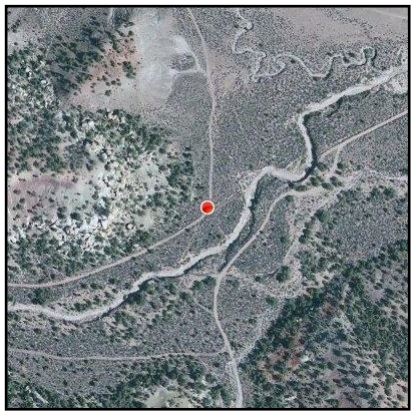

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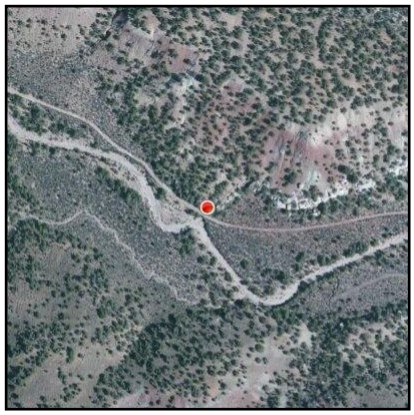

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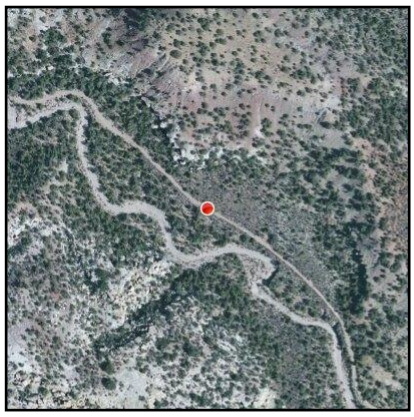

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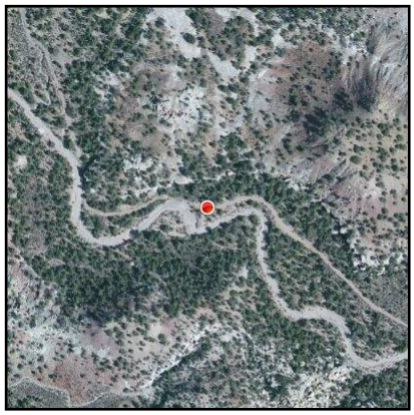

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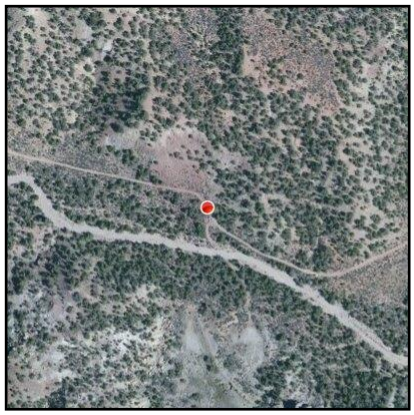

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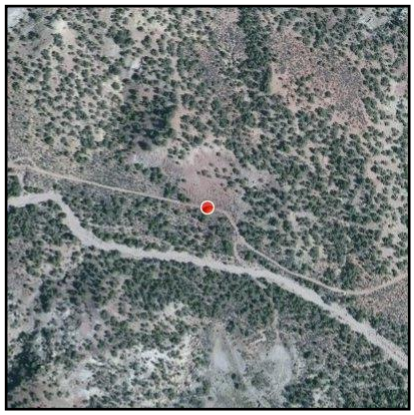

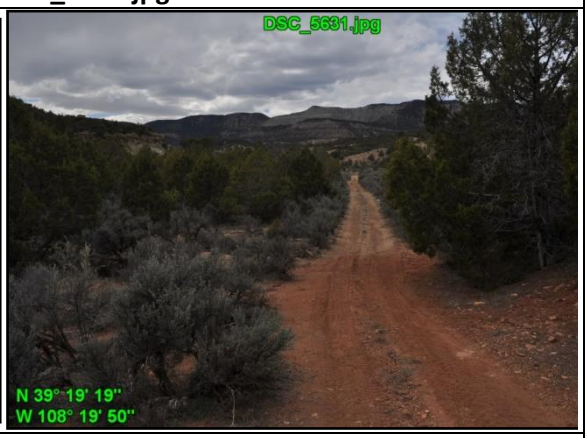

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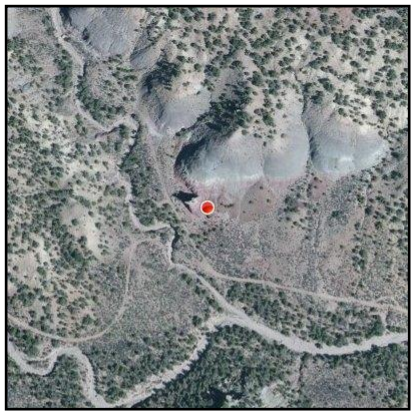

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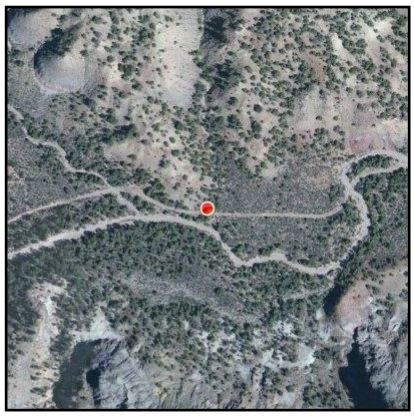

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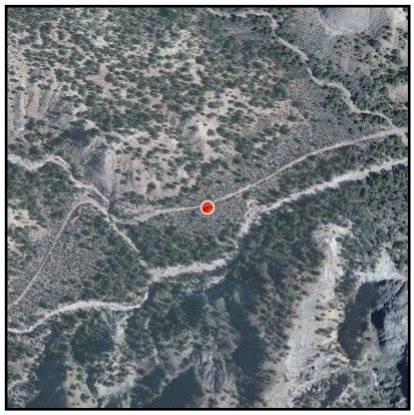

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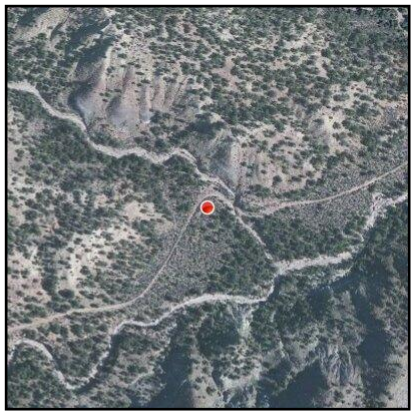

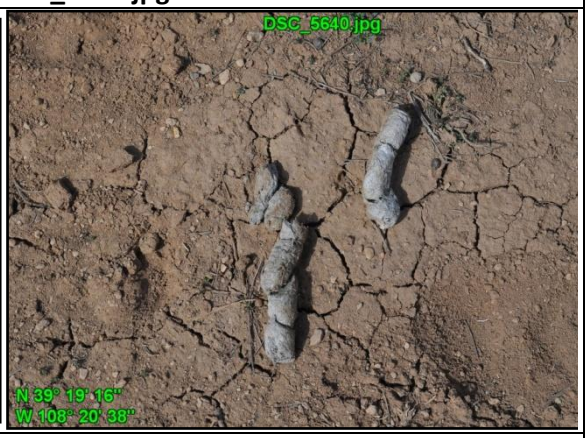

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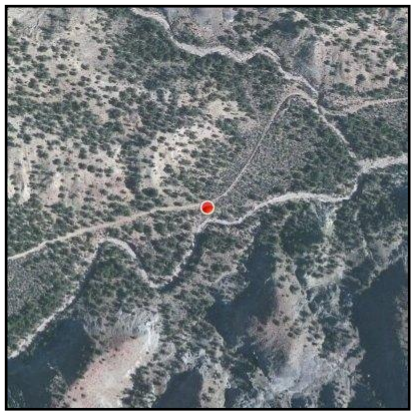

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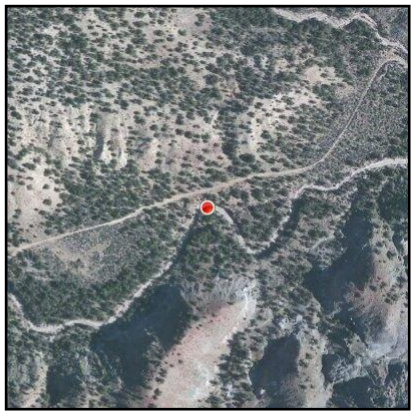

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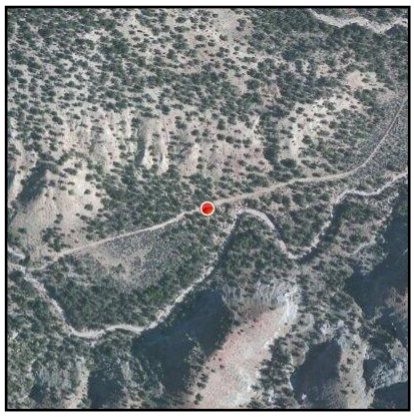

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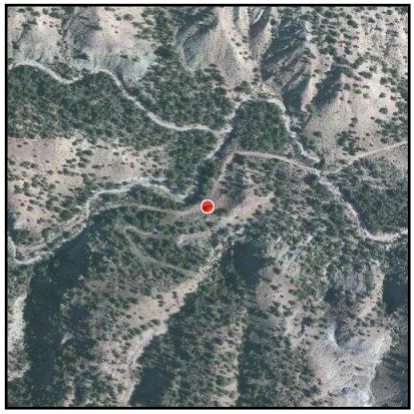

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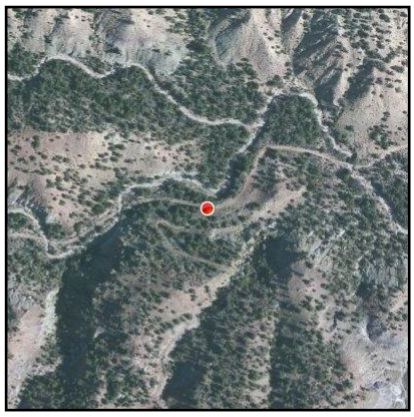

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Elevation	
Photo Direction	

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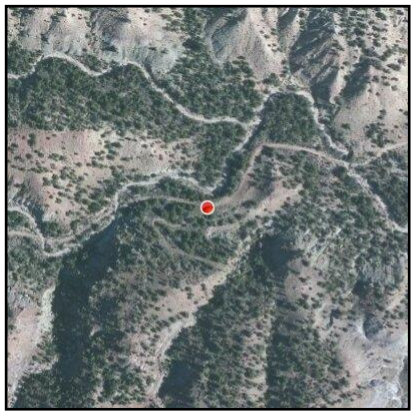

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Photo Direction	

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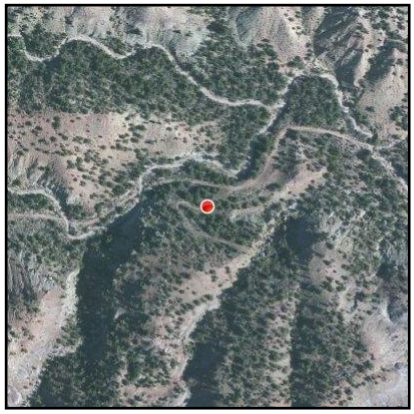

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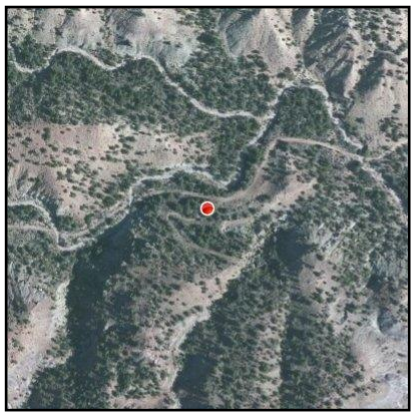

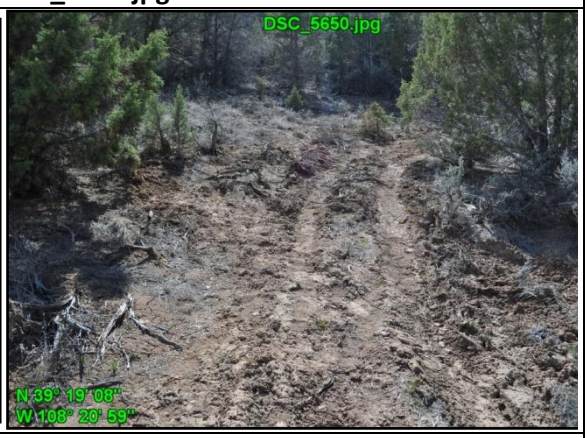

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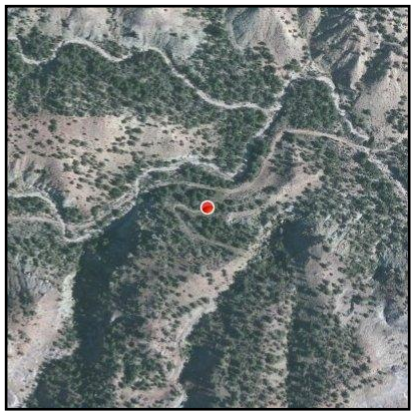

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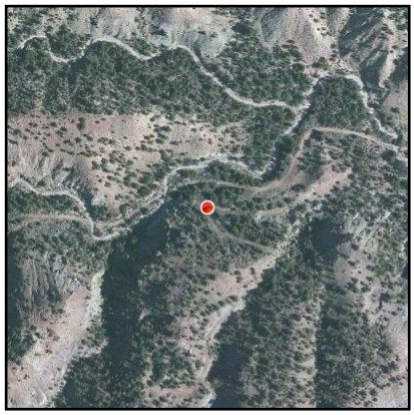
DSC_5652.jpg



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Elevation	
Photo Direction	

DSC_5653.jpg

Title:

Attributes	
File Name	DSC_5655.jpg
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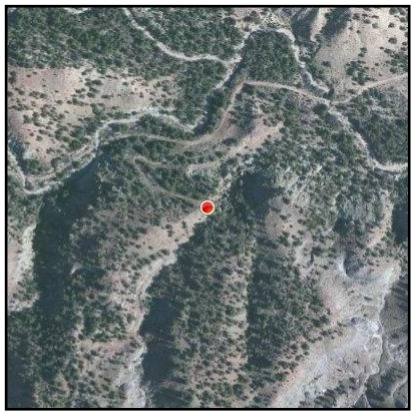
DSC_5655.jpg



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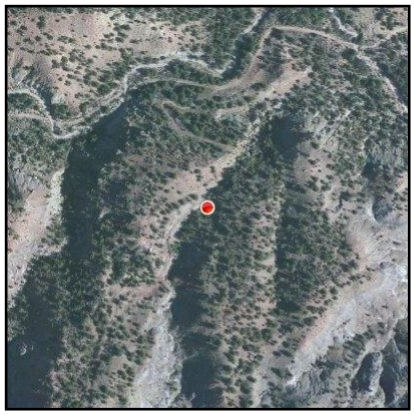

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Elevation	
Photo Direction	

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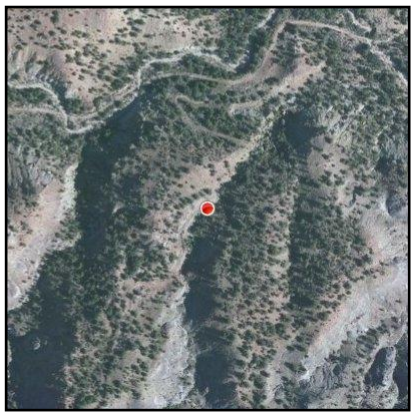

Title:

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Elevation	
Photo Direction	

DSC_5658.jpg

Title:

Attributes	
File Name	DSC_5659.jpg
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Subject	
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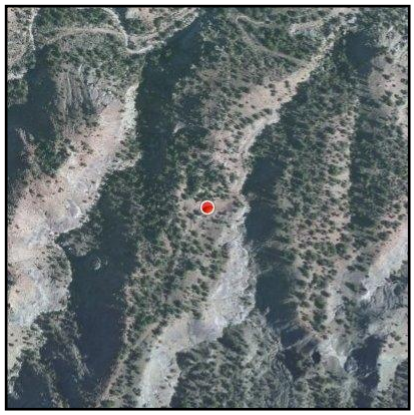
Elevation	
Photo Direction	

DSC_5659.jpg



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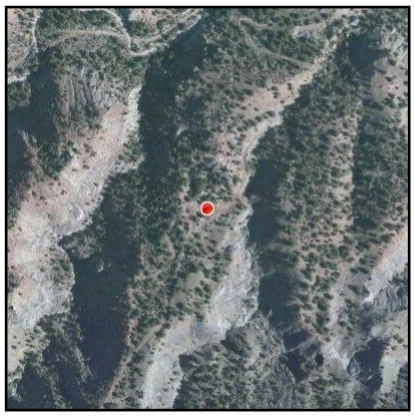
Elevation	
Photo Direction	

DSC_5660.jpg



Title:

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Longitude	W 108° 21' 01"
Elevation	
Photo Direction	

DSC_5661.jpg

Title:

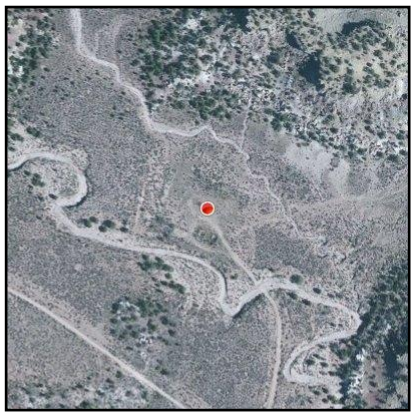
Attributes	
File Name	DSC_5662.jpg
Title	
Subject	
Latitude	N 39° 19' 03"
Longitude	W 108° 21' 01"
Elevation	
Photo Direction	

DSC_5662.jpg

Title:

Attributes	
File Name	DSC_5663.jpg
Title	
Subject	
Latitude	N 39° 19' 02"
Longitude	W 108° 17' 58"
Elevation	
Photo Direction	

DSC_5663.jpg



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Subject	
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Elevation	
Photo Direction	

DSC_5664.jpg

Title:

Attributes	
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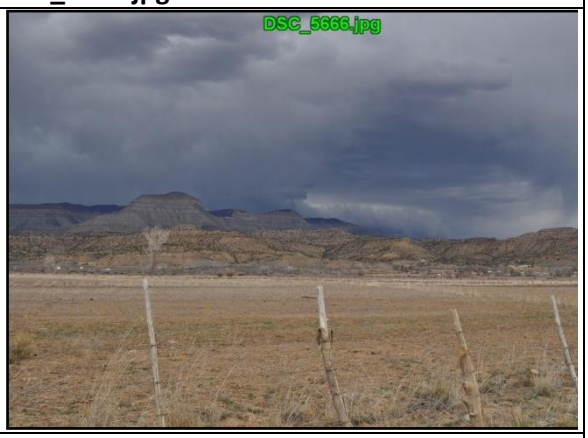
Subject	
Latitude	
Longitude	
Elevation	
Photo Direction	

DSC_5666.jpg



Title:

Attributes	
File Name	DSC_5669.jpg
Title	
Subject	
Latitude	
Longitude	
Elevation	
Photo Direction	

DSC_5669.jpg

Title:

Spink Canyon

Summary and Boundary Delineation

The BLM's "Grand Junction Field Office Wilderness Characteristics Inventory Update" released in July 2012 (hereafter "draft inventory") identified the Spink Canyon unit as an area that could meet the criteria for lands with wilderness characteristics. Through spatial data analysis, the BLM identified an area of approximately 13,100 acres surrounding Spink and Long Canyons as a potential Lands with Wilderness Characteristics (LWC). This area was inventoried in 2011, prior to the release in 2012 of revised BLM Manual 6310 which provided new guidance on conducting wilderness characteristics on BLM lands. The result of this inventory is that BLM found all 13,100 acres of the Spink Canyon unit meet the criteria for size, naturalness, outstanding opportunities for solitude, and thus qualify for possible protection as a LWC.

During May and June of 2013, The Wilderness Society and Conservation Colorado visited Spink Canyon to conduct an on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's draft inventory boundaries for the unit met the criteria for an LWC boundary as laid out in BLM Manual 6310, and if not, how the boundaries might be adjusted to better meet that guidance. An additional goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made, in order to more thoroughly document the wilderness characteristics that exist in the unit in its entirety.

BLM's Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310, p. 4). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

In this particular case, TWS identified several adjustments that should be made to the BLM's boundaries for the Spink Canyon unit to bring them in line with the policies for boundary delineation described in Manual 6310. These boundary adjustments are detailed below (and in the attached map and photosheet). The result is that the BLM boundaries for the Spink Canyon unit do not always match up with Wilderness Inventory Roads or other qualifying boundary features; the actual boundary for the Spink Canyon unit is slightly larger than presented by BLM. These boundary changes result in the expansion of the Spink Canyon unit to the north and east.

Although we agree with the BLM's findings that the Spink Canyon unit has outstanding wilderness characteristics, the area defined and analyzed in that assessment is incorrect. Without identifying the true boundaries of a potential LWC unit as defined by Manual 6310, any determination of the wilderness characteristics, or any management decisions based on these determinations, would not be based on complete information. Only after these boundary adjustments are made can a complete picture of the area's outstanding wilderness characteristics be assessed.

BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying wilderness characteristics. Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is not a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by

mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Several of the boundaries BLM has proposed for the Spink Canyon unit do not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Our suggestions for such changes are below. All route names referred to below correspond with the route names as they appear in the Grand Junction Field Office Travel Management maps provided by the BLM.

The Spink Canyon unit, as defined by the BLM, has a southern boundary that departs B63 at the junction of B63 and B60 (photo 3) and travels northeast down B63 to a junction with the small private property inholding at the bottom of Spink Canyon. B63 does not qualify as a WIR. The route is heavily vegetated (photos 6 and 8), narrow, and steep (photo 3) and is clearly not maintained using mechanical means to ensure relatively regular and continuous use (photos 3 through 8). The boundary following this route should be deleted and moved back up to B63 where it continues east and south down to Colorado Highway 139.

Beyond the private parcel at the bottom of Spink Canyon mentioned in the paragraph above (at junction of B157 and B79) the BLM continues their boundary southeast along the bottom of Spink Canyon (identified on BLM TMP maps as B79). B79 has no access from Colorado Highway 139 as it is blocked by private property. Further, the route does not qualify as a WIR as it is not maintained and almost completely overgrown, especially as it approaches Highway 139. This boundary should be deleted resulting in the inclusion of all the public lands within lower Spink Canyon proper north of B63.

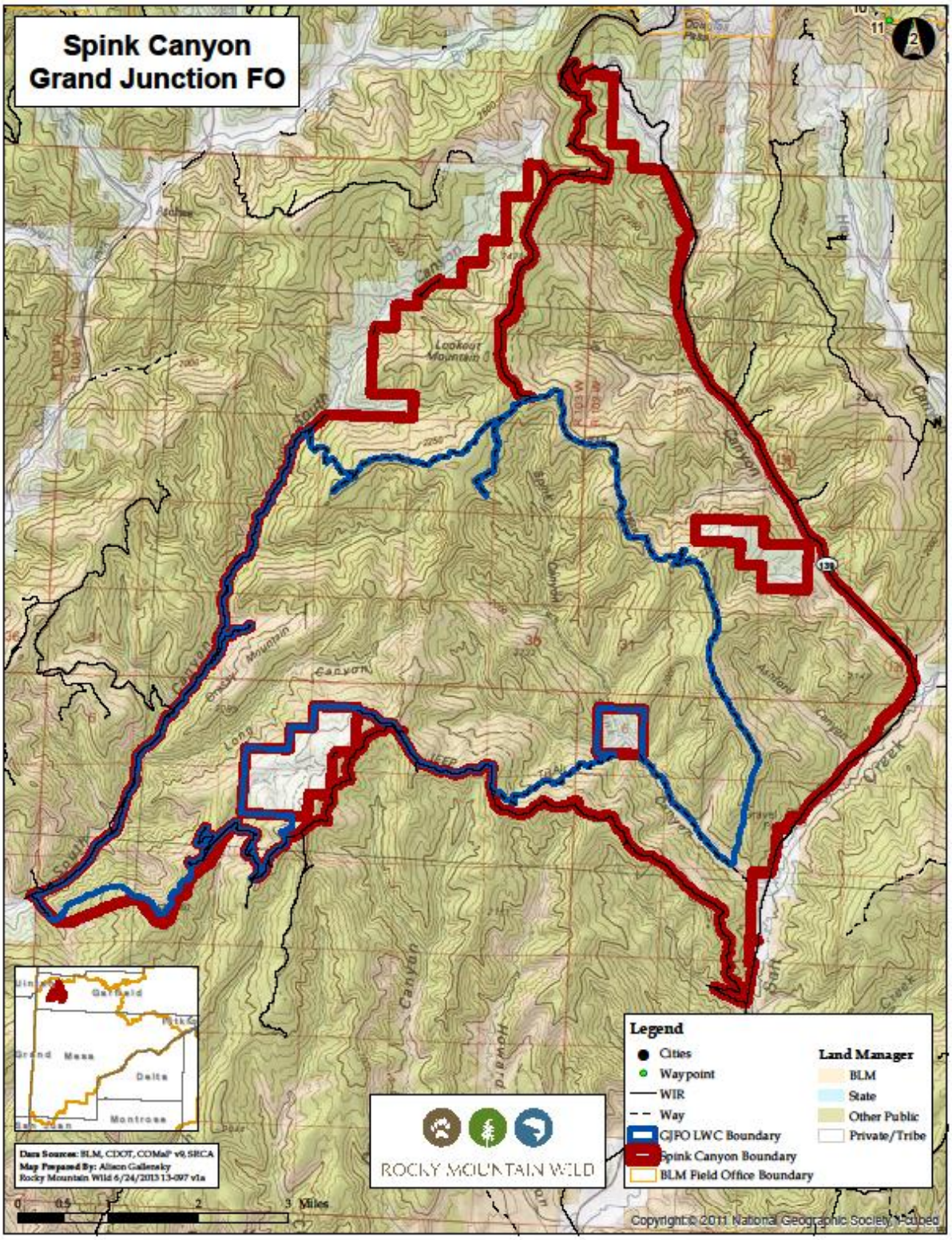
At the terminus of B108, the BLM draws a boundary that leaves the ridgetop and cuts directly down the steep slopes at the mouth of Spink Canyon above Highway 139. This boundary follows no existing on-the-ground feature and does not qualify as a boundary under BLM policies. This route should be deleted and moved to qualifying boundary features to the north. This would result in the cherrystemming of B108, however B108 does not qualify as a WIR either. B108 was clearly constructed using mechanical means. However it is no longer in use. The route is overgrown near its western end (photos 16, 17, and 18) and as it progresses east and south it becomes significantly worse. At one point much of the route has collapsed into the steep drainage to its west (photo 21) and all that remains is a singletrack path. Further down the route, large boulders have eroded away from the uphill cutbank and crashed down onto the road surface (photo 24). B108 does not qualify as a WIR and should not be cherrystemmed out of the LWC unit or used as a boundary feature.

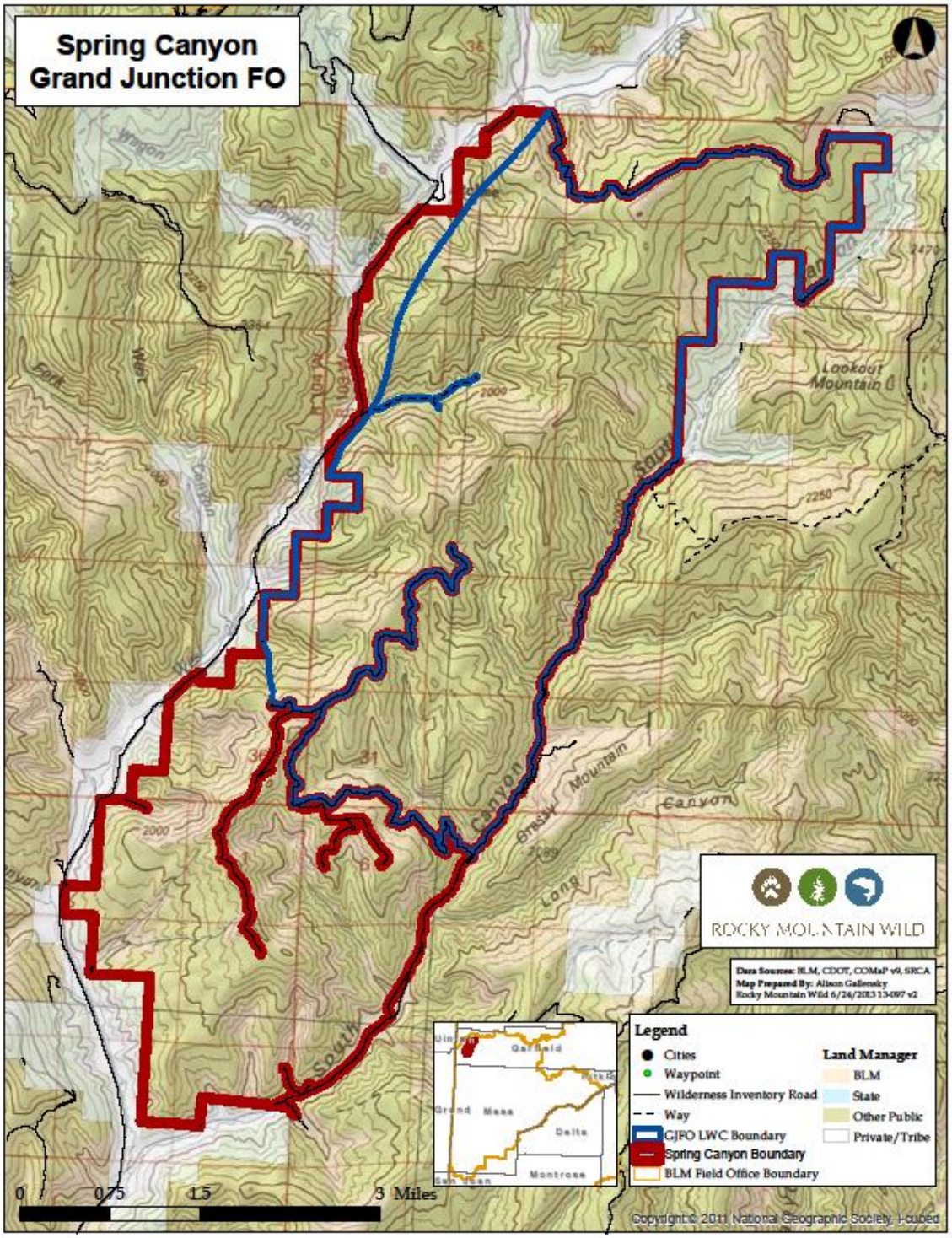
On the western end of the BLM's northern boundary for the Spink Canyon unit, in South Canyon, a boundary is drawn up B153/154 to the junction with B36. This route receives use by OHVs however it is a difficult route that is not maintained using mechanical means (photo 31). As the route switchbacks up the ridge, it becomes extremely overgrown, narrow, and technical (photos 32, 38, and 42). Although some segments of the route are passable to passenger vehicles, the loose, steep, and narrow sections near South Canyon road prevent passenger vehicle use on this route. B153/154 should not be used as a boundary for the Spink Canyon unit. The BLM's boundary should be deleted in this area and moved north to encompass all the public lands along the west side of Lookout Mountain above South Canyon.

Additional boundary and route comments for the BLM's Spink Canyon unit can be found in the comments for each photograph on the attached photosheet for Spink Canyon.

Summary and Recommendation:

The BLM determined in their draft inventory of potential lands with wilderness characteristics that the area analyzed by BLM as the Spink Canyon unit contains outstanding wilderness characteristics and thus qualifies for protection considerations as a Lands with Wilderness Characteristics. However, as described throughout this document, the Spink Canyon unit analyzed by the BLM is conscribed by boundaries that do not meet the criteria for boundary delineation as defined in the BLM's own policies. Although we agree that the area does in fact meet the criteria for a Lands with Wilderness Characteristics, the full acreage of the unit has not be analyzed or discussed. The BLM's draft inventory for the Spink Canyon unit contains one Route Analysis form and two total photographs, otherwise documentation is included explaining why certain areas were used as boundaries by the BLM and others were not. The BLM's Spink Canyon unit should be re-inventoried and any determinations made as to the wilderness characteristics found or not found therein should be documented with geotagged photographs, maps, and route analysis forms as required by BLM Manual 6310.

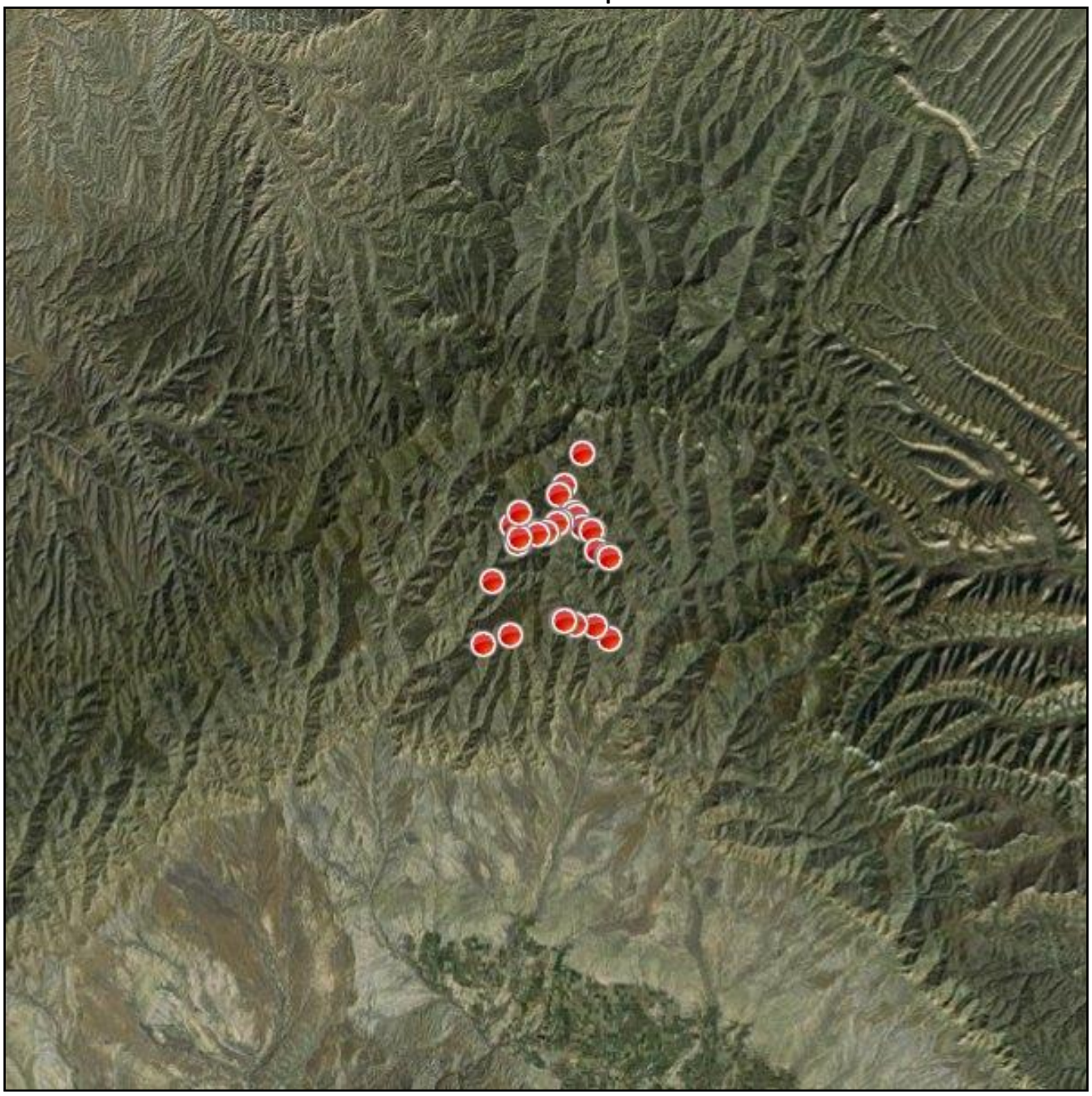

Spink Canyon
Grand Junction FO
Legend
Cities
Waypoint
WIR
Way
GJPO LWC Boundary
Spink Canyon Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/24/2013 13-097 v1a
0 0.5 2 3 Miles
Copyright:© 2011 National Geographic Society, Cubed
Lookout Mountain
Spink Canyon
Long Canyon
Rocky Mountain Canyon
Ashland Canyon
Howard Canyon
Salt Creek
Garfield
Mesa
Delta
Montrose


Spring Canyon
Grand Junction FO
Lookout Mountain
Canyon
Long
Bristly Mountain
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 6/24/2013 13-097 v2
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
GJFO LWC Boundary
Spring Canyon Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
Garfield
Grand Mesa
Delta
Montrose
San Juan
0 0.75 1.5 3 Miles
Copyright © 2011 National Geographic Society, i-cubed

Spink Canyon Photopoints

The location coordinates for the photos are included below along with descriptions and comments detailing the subject of each photograph

Overview Map



Attributes	
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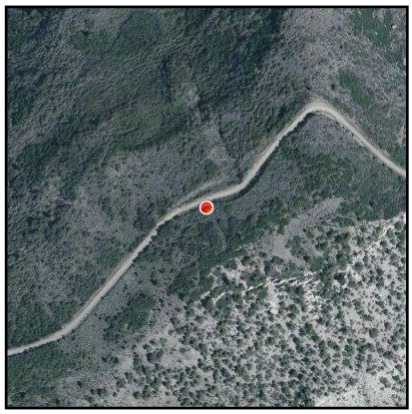
Title	
Subject	
Latitude	N 39° 27' 46"
Longitude	W 108° 47' 59"
Elevation	6642 ft
Photo Direction	301° WNW

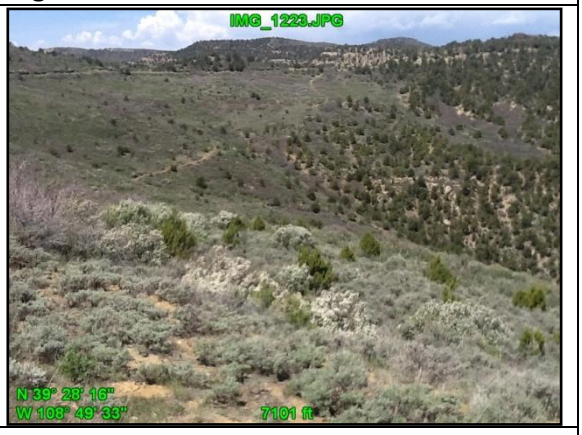
1 – a view from B63 up lower Spink Canyon reveals the beauty of the unit and the outstanding solitude that can be found there.

Title:

Attributes	
File Name	IMG_1223.JPG
Title	
Subject	
Latitude	N 39° 28' 16"
Longitude	W 108° 49' 33"
Elevation	7101 ft
Photo Direction	255° WSW

2 – looking north from B63.





Title:

Attributes	
File Name	IMG_1224.JPG
Title	
Subject	
Latitude	N 39° 28' 25"
Longitude	W 108° 50' 08"
Elevation	7082 ft
Photo Direction	97° E

3 – looking southeast at junction of B63 and B60. B60 is the graded road to the right. B63 drops off the steep slope to the left and is clearly not maintained.

Title:

Attributes	
File Name	IMG_1225.JPG
Title	
Subject	
Latitude	N 39° 28' 24"
Longitude	W 108° 50' 08"
Elevation	7074 ft
Photo Direction	145° SE

4 – B63. Not maintained and not a WIR. For TMP purposes the route should be closed to motorized travel and rehabilitated where it is still visible.

Title:

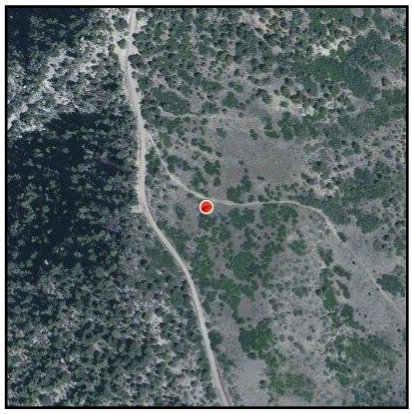
Attributes	
File Name	IMG_1226.JPG
Title	
Subject	
Latitude	N 39° 28' 23"
Longitude	W 108° 50' 08"
Elevation	7068 ft
Photo Direction	158° SSE

5 – outstanding views are easily found along the high ridges of the Spink Canyon unit.

Title:

Attributes	
File Name	IMG_1227.JPG
Title	
Subject	
Latitude	N 39° 28' 22"
Longitude	W 108° 50' 06"
Elevation	7052 ft
Photo Direction	115° ESE

6 – B60 is almost indiscernible in spots. The route likely sees no use.



Title:

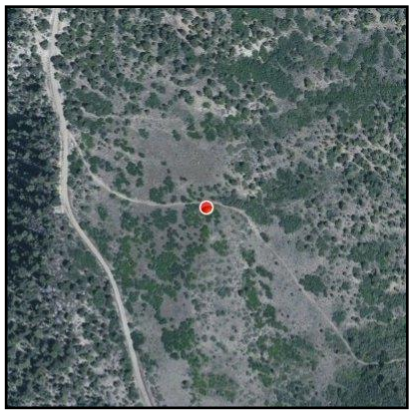
Attributes	
File Name	IMG_1228.JPG
Title	
Subject	
Latitude	N 39° 28' 22"
Longitude	W 108° 50' 02"
Elevation	6978 ft
Photo Direction	0° N

7 - B60 is gullied and becoming naturally reclaimed.

Title:

Attributes	
File Name	IMG_1229.JPG
Title	
Subject	
Latitude	N 39° 28' 22"
Longitude	W 108° 50' 03"
Elevation	6992 ft
Photo Direction	278° W

8 - B60 does not qualify as a WIR for boundary delineation purposes. For TMP purposes the route should be officially closed to motorized traffic and rehabilitated.



Title:

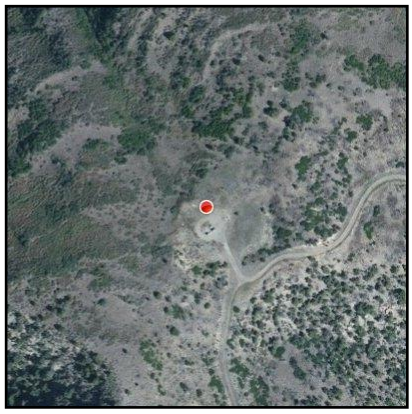
Attributes	
File Name	IMG_1231.JPG
Title	
Subject	
Latitude	N 39° 27' 52"
Longitude	W 108° 52' 37"
Elevation	7464 ft
Photo Direction	78° ENE

9 – B113 does not appear to have been constructed using mechanical means nor does it appear to be regularly maintained. B113 does not provide access to private lands as that access is achieved off of B57. This route should be closed to motorized travel and reclaimed.

Title:

Attributes	
File Name	IMG_1233.JPG
Title	
Subject	
Latitude	N 39° 27' 35"
Longitude	W 108° 53' 51"
Elevation	7095 ft
Photo Direction	305° NW

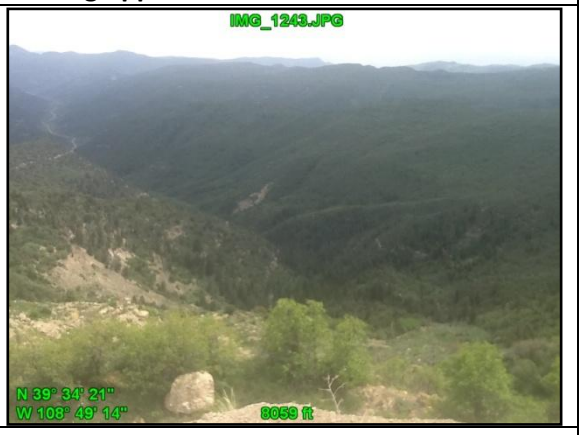
10 – views north toward the BLM's Spring Canyon unit.



Title:

Attributes	
File Name	IMG_1243.JPG
Title	
Subject	
Latitude	N 39° 34' 21"
Longitude	W 108° 49' 14"
Elevation	8059 ft
Photo Direction	258° WSW

11 – looking south towards Highway 139. The forested slopes provide excellent primitive hunting opportunties.



Title:

Attributes	
File Name	IMG_1246.JPG
Title	
Subject	
Latitude	N 39° 33' 14"
Longitude	W 108° 50' 05"
Elevation	7843 ft
Photo Direction	0° N

12 – B165 has several overgrown and lightly used sections.

Title:

Attributes	
File Name	IMG_1247.JPG
Title	
Subject	
Latitude	N 39° 32' 55"
Longitude	W 108° 50' 16"
Elevation	7916 ft
Photo Direction	193° SSW

13 – an exposed and antiquated pipeline hangs by rope and wire along B165. If this pipeline is no longer in service it should be removed. If it is in service, it must be more safely secured.

Title:

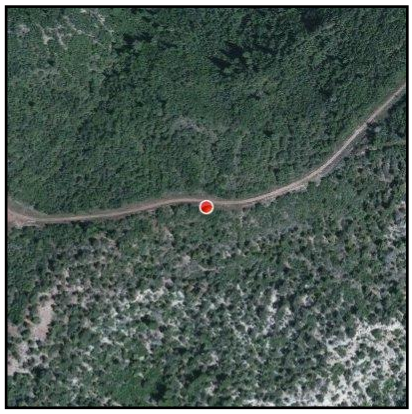
Attributes	
File Name	IMG_1248.JPG
Title	
Subject	
Latitude	N 39° 32' 55"
Longitude	W 108° 50' 16"
Elevation	7916 ft
Photo Direction	193° SSW

14 – naturalness of the Spink Canyon unit.

Title:

Attributes	
File Name	IMG_1249.JPG
Title	
Subject	
Latitude	N 39° 32' 11"
Longitude	W 108° 49' 43"
Elevation	7693 ft
Photo Direction	92° E

15 – near the start of B108



Title:

Attributes	
File Name	IMG_1250.JPG
Title	
Subject	
Latitude	N 39° 32' 12"
Longitude	W 108° 49' 40"
Elevation	7688 ft
Photo Direction	64° ENE

16 – east at the start of B108. Right from its onset, B108 shows signs of little use and revegetation.

Title:

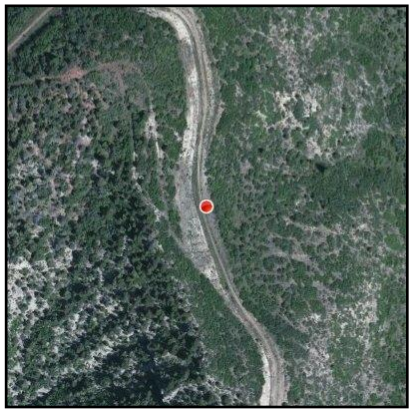
Attributes	
File Name	IMG_1251.JPG
Title	
Subject	
Latitude	N 39° 32' 14"
Longitude	W 108° 49' 36"
Elevation	7687 ft
Photo Direction	0° N

17 – B108. The route quickly becomes overgrown and unmaintained.

Title:

Attributes	
File Name	IMG_1252.JPG
Title	
Subject	
Latitude	N 39° 32' 10"
Longitude	W 108° 49' 29"
Elevation	7626 ft
Photo Direction	170° S

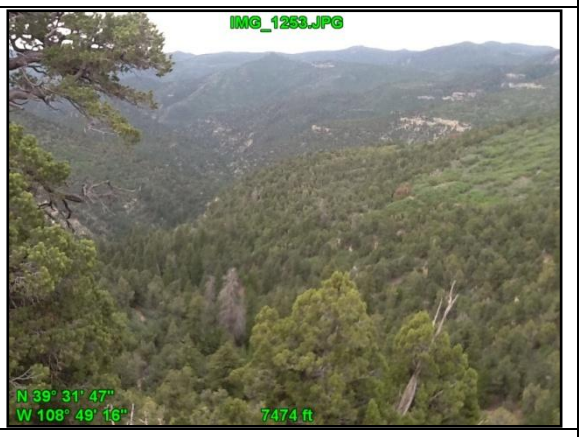
18 – B108 begins to disappear under new growth.



Title:

Attributes	
File Name	IMG_1253.JPG
Title	
Subject	
Latitude	N 39° 31' 47"
Longitude	W 108° 49' 16"
Elevation	7474 ft
Photo Direction	125° SE

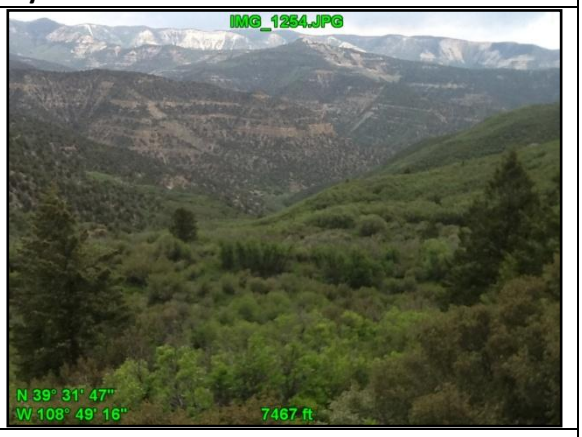
19 – Spink Canyon is a wild and beautiful canyon, with large pines and forested slopes. The canyon offers outstanding opportunities for solitude and unconfined recreation.



Title:

Attributes	
File Name	IMG_1254.JPG
Title	
Subject	
Latitude	N 39° 31' 47"
Longitude	W 108° 49' 16"
Elevation	7467 ft
Photo Direction	20° NNE

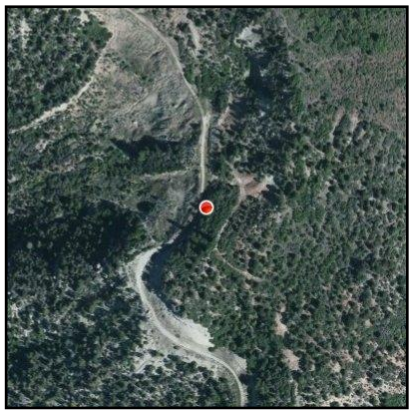
20 – looking east and north over the expanded Spink Canyon unit. Isolation is easily found here.



Title:

Attributes	
File Name	IMG_1255.JPG
Title	
Subject	
Latitude	N 39° 31' 40"
Longitude	W 108° 48' 46"
Elevation	7492 ft
Photo Direction	178° S

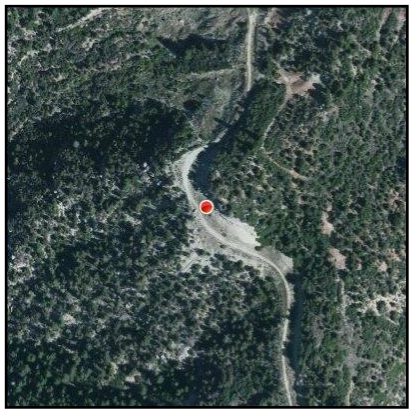
21 – B108 has eroded and much of the roadbed has slid down into the downhill drainage. Large cracks in the roadbed can be easily found and the route is dangerous to travel in motorized vehicles. B108 is not a WIR and for TMP purposes should be closed to motorized travel and rehabilitated.



Title:

Attributes	
File Name	IMG_1256.JPG
Title	
Subject	
Latitude	N 39° 31' 37"
Longitude	W 108° 48' 47"
Elevation	7479 ft
Photo Direction	143° SE

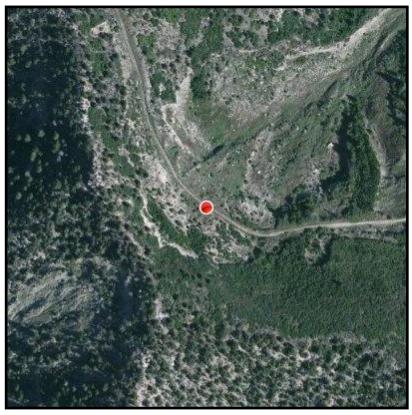
22 – another view west into Spink Canyon proper.



Title:

Attributes	
File Name	IMG_1257.JPG
Title	
Subject	
Latitude	N 39° 30' 53"
Longitude	W 108° 48' 34"
Elevation	7334 ft
Photo Direction	138° SE

23 – B108 beyond the collapsed roadbed is rarely if ever traveled by motorized vehicles. This route does not qualify as a boundary road for LWC purposes.



Title:

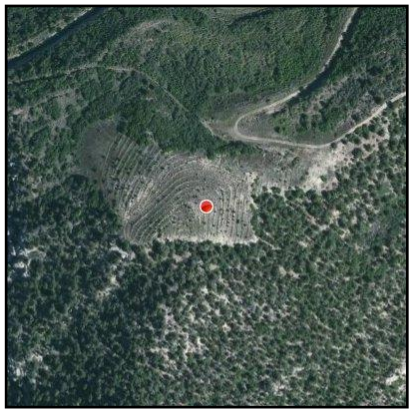
Attributes	
File Name	IMG_1259.JPG
Title	
Subject	
Latitude	N 39° 30' 43"
Longitude	W 108° 48' 04"
Elevation	7134 ft
Photo Direction	106° ESE

24 – Large boulders have eroded off the surrounding hillside and crashed down onto B108, blocking much of the route. The route is clearly not maintained using mechanical means to ensure regular and continous use.

Title:

Attributes	
File Name	IMG_1260.JPG
Title	
Subject	
Latitude	N 39° 30' 37"
Longitude	W 108° 47' 60"
Elevation	7375 ft
Photo Direction	249° WSW

25 – from aerial photography this area appears substantially noticeable. However, from ground level is appears natural.



Title:

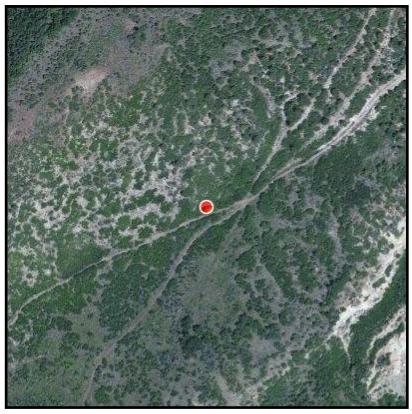
Attributes	
File Name	IMG_1261.JPG
Title	
Subject	
Latitude	N 39° 30' 37"
Longitude	W 108° 48' 01"
Elevation	7398 ft
Photo Direction	0° N

26 – another view of the seemingly disturbed area along B108. The casual visitor is unlikely to notice the manipulations here as the area appears natural and blends in well with the surrounding terrain.

Title:

Attributes	
File Name	IMG_1262.JPG
Title	
Subject	
Latitude	N 39° 31' 59"
Longitude	W 108° 50' 13"
Elevation	7562 ft
Photo Direction	255° WSW

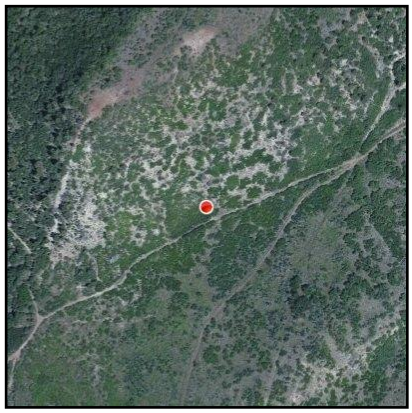
27



Title:

Attributes	
File Name	IMG_1263.JPG
Title	
Subject	
Latitude	N 39° 31' 58"
Longitude	W 108° 50' 17"
Elevation	7543 ft
Photo Direction	249° WSW

28



Title:

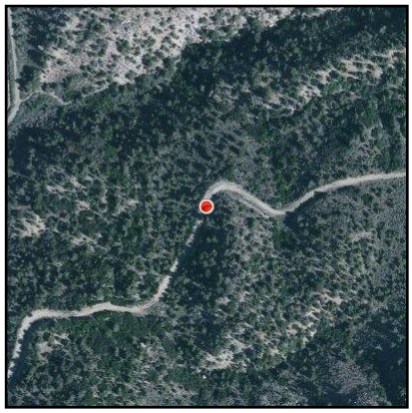
Attributes	
File Name	IMG_1264.JPG
Title	
Subject	
Latitude	N 39° 31' 59"
Longitude	W 108° 50' 11"
Elevation	7567 ft
Photo Direction	60° ENE

29

Title:

Attributes	
File Name	IMG_1270.JPG
Title	
Subject	
Latitude	N 39° 29' 49"
Longitude	W 108° 53' 25"
Elevation	6066 ft
Photo Direction	0° N

30



Title:

Attributes	
File Name	IMG_1272.JPG
Title	
Subject	
Latitude	N 39° 31' 49"
Longitude	W 108° 52' 34"
Elevation	6490 ft
Photo Direction	0° N

31 – junction of B153 and South Canyon Road (B92). As shown in this photograph, B153 is not bladed or otherwise maintained using mechanical means. The route is used by OHVs but is steep, overgrown and technical. The route does not qualify as a WIR and the BLM's LWC boundary following this route should be deleted and moved to the next qualifying boundary feature to the north.

Title:

Attributes	
File Name	IMG_1274.JPG
Title	
Subject	
Latitude	N 39° 31' 25"
Longitude	W 108° 52' 11"
Elevation	7260 ft
Photo Direction	0° N

32 – B153 is very overgrown and very narrow in places. The route is not passable to passenger vehicles.

Title:

Attributes	
File Name	IMG_1275.JPG
Title	
Subject	
Latitude	N 39° 31' 19"
Longitude	W 108° 52' 05"
Elevation	7459 ft
Photo Direction	228° SW

33 – B154 along the ridge above South Canyon. This route segment leads to a small and substantially unnoticeable water tank that appears to be out of use. The route is not bladed or otherwise maintained and does not qualify as a WIR.

Title:

Attributes	
File Name	IMG_1276.JPG
Title	
Subject	
Latitude	N 39° 31' 12"
Longitude	W 108° 52' 17"
Elevation	7438 ft
Photo Direction	0° N

34 – one of a few small water tanks located along B154. These tanks are substantially unnoticeable and well screened.

Title:

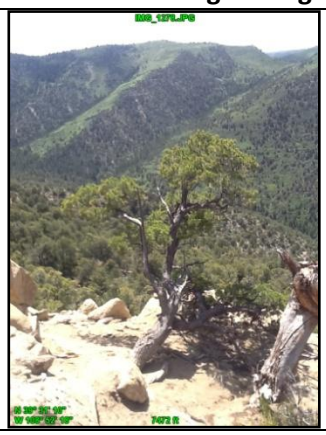
Attributes	
File Name	IMG_1277.JPG
Title	
Subject	
Latitude	N 39° 31' 10"
Longitude	W 108° 52' 17"
Elevation	7474 ft
Photo Direction	0° N

35 – views south show the outstanding solitude that can be found in the Spink Canyon unit.

Title:

Attributes	
File Name	IMG_1278.JPG
Title	
Subject	
Latitude	N 39° 31' 10"
Longitude	W 108° 52' 18"
Elevation	7472 ft
Photo Direction	0° N

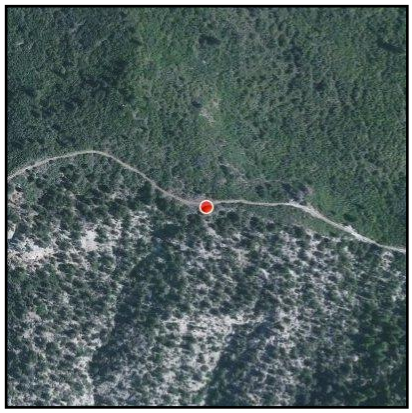
36 – excellent photography opportunities are found alonng the high ridges.



Title:

Attributes	
File Name	IMG_1280.JPG
Title	
Subject	
Latitude	N 39° 31' 32"
Longitude	W 108° 51' 25"
Elevation	7610 ft
Photo Direction	81° E

37 – B154 is overgrown and used only lightly.



Title:

Attributes	
File Name	IMG_1282.JPG
Title	
Subject	
Latitude	N 39° 31' 37"
Longitude	W 108° 50' 44"
Elevation	7677 ft
Photo Direction	0° N

38 – B154 is very narrow in many places. The route is passable only to narrow OHVs or motorcycles.

Title:

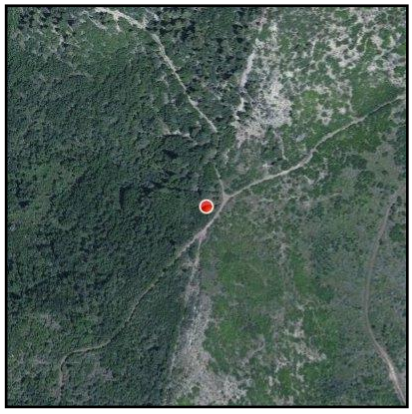
Attributes	
File Name	IMG_1284.JPG
Title	
Subject	
Latitude	N 39° 31' 53"
Longitude	W 108° 50' 25"
Elevation	7657 ft
Photo Direction	0° N

39 – a well screened fenceline near B154.

Title:

Attributes	
File Name	IMG_1285.JPG
Title	
Subject	
Latitude	N 39° 31' 54"
Longitude	W 108° 50' 24"
Elevation	7644 ft
Photo Direction	0° N

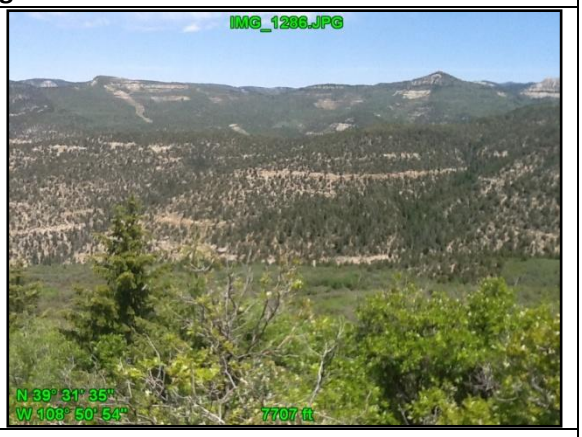
40 – B40 heads north off of B154 and is rarely if ever traversed. The route is not bladed or otherwise maintained using mechanical means. For TMP purposes the route should be closed to motorized travel and rehabilitated.



Title:

Attributes	
File Name	IMG_1286.JPG
Title	
Subject	
Latitude	N 39° 31' 35"
Longitude	W 108° 50' 54"
Elevation	7707 ft
Photo Direction	0° N

41 – outstanding view to the north and east.



Title:

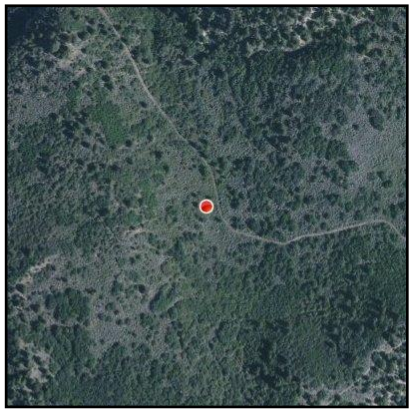
Attributes	
File Name	IMG_1287.JPG
Title	
Subject	
Latitude	N 39° 31' 32"
Longitude	W 108° 51' 20"
Elevation	7604 ft
Photo Direction	0° N

42 - B154 traverses very near to steep cliffs. The loose soils in this area are easily eroded. The route has clearly not be maintained using mechanical means, likely since it was constructed.

Title:

Attributes	
File Name	IMG_1289.JPG
Title	
Subject	
Latitude	N 39° 31' 24"
Longitude	W 108° 52' 11"
Elevation	7329 ft
Photo Direction	0° N

43 - B153 is very steep and overgrown. This route should be left within the LWC unit as a way, however it does not qualify as a boundary road for defining a LWC unit.



Title:

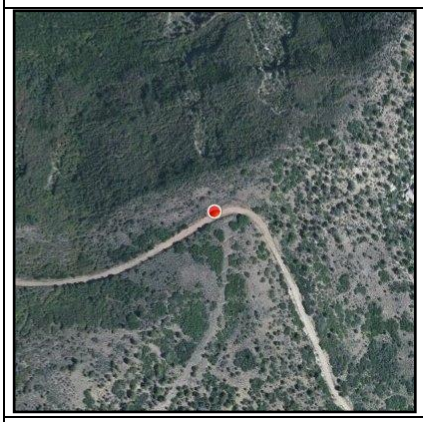
Attributes	
File Name	IMG_1290.JPG
Title	
Subject	
Latitude	N 39° 32' 17"
Longitude	W 108° 52' 10"
Elevation	6473 ft
Photo Direction	0° N

44 – a locked gate prevents access up South Canyon road along B92. It is unclear whether B92 is maintained beyond the private property here. If not, the BLM's Spink and Spring Canyons units should be combined into one.

Title:

Attributes	
File Name	spinkcanyon.jpg
Title	
Subject	
Latitude	N 39° 28' 11"
Longitude	W 108° 48' 39"
Elevation	
Photo Direction	

45 – a view of much of the Spink Canyon unit. This area is remote and provides as much solitude and as many unconfined recreation opportunities as anywhere else in the Grand Junction field office.



Title: