Lands with Wilderness Characteristics

in the White River Field Office:

A Tour of Wilderness Values and the Case for Protection

Banta Ridge *Photo: Soren Jespersen*

Submitted to the BLM White River Field Office by

THE WILDERNESS SOCIETY

Conservation Colorado
The future is worth the fight

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Introduction

The Bureau of Land Management White River Field Office manages 1.5 million acres of public lands in Colorado's northwest corner. As the name suggests, these lands surround the White River as it flows from its headwaters in the Flat Tops Wilderness to its convergence with the Green River in Utah. This is a land of wide open basins and sagebrush sea, where the iconic greater sage-grouse still appears every spring to perform its elaborate mating ritual and westerners can experience first-hand our rich history of pioneers, outlaws and the settlement of the West. White River country is a sportsmen paradise – it is home to North America's largest elk herd and a vital mule deer population, and hunting and fishing contribute significantly to the local economy. Bordering Dinosaur National Monument and encompassing a handful of wilderness study areas, this area also has abundant wild lands and the potential to conserve some of Colorado's most outstanding wilderness and wildlife. As energy development ramps up in the Piceance Basin and other oil and gas hot spots in northwest Colorado, the need for protection of our wildest public lands has never been more pressing.

In March 2012, the Bureau of Land Management issued new manuals for inventorying lands with wilderness characteristics on the public lands and considering protecting those lands in land use planning. These manuals provide the agency with direction for implementing its legal obligations to inventory and consider management of lands with wilderness characteristics, including the Federal Land Policy and Management Act's provision that BLM "preserve and protect certain public lands in their natural condition" (43 U.S.C. § 1701(a)(8)). Manual 6310 (*Conducting Wilderness Characteristics Inventory on BLM Lands*) guides the BLM on how to meet its obligations to inventory for and identify lands with wilderness characteristics. Manual 6320 (*Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process*) guides the BLM on the options available to address lands with wilderness characteristics in land use planning once they have been identified in the required inventory, such as putting management prescriptions in place to protect wilderness characteristics.

The Wilderness Society and Conservation Colorado spent the summer of 2012 inventorying potential lands with wilderness characteristics in the White River Field Office, guided by the new manuals. We completed a field inventory of more than a quarter million acres of potential lands with wilderness characteristics, assessing the three criteria set forth in the Wilderness Act and incorporated into the Federal Land Policy and Management Act and BLM's inventory manual – size, naturalness, and outstanding opportunities for solitude or a primitive and unconfined type of recreation. We also documented, in more than a thousand geotagged photos and detailed field notes, boundary roads and other routes, other infrastructure and conditions on the ground, and supplemental values, such as ecological significance, that demonstrate the importance of managing specific areas for protection.

The lands described in this report meet the Bureau of Land Management's criteria for lands with wilderness characteristics, and possess outstanding wilderness qualities that deserve protection from activities and uses that would degrade their wilderness values. We urge the BLM White River Field Office to protect these areas as lands with wilderness characteristics and conserve the exceptional wilderness experiences they provide.

Summary of Methodology

In August 2012, the BLM White River Field Office released its *Non-WSA Lands with Wilderness Characteristics Inventory Update*, which identified 30 individual polygons totaling 252,000 acres as potential lands with wilderness characteristics. These areas were identified through a "desktop" inventory, using GIS analysis, aerial imagery and other information available to BLM. The White River Field Office has begun field inventories of some of these units through specific planning processes. In response to the *Inventory Update*, The Wilderness Society and Conservation Colorado set out to conduct our own inventory of the field office, following the very protocols and criteria laid out in revised BLM Manual 6310 *(Conducting Wilderness Inventories on BLM Lands)*. The citizen-led inventory confirms many conclusions of the BLM's initial efforts; however, it also shows that numerous significant gaps remain in the BLM's preliminary inventory, such as overlooked units and incorrect boundary delineations for identified units.

While we appreciate the preliminary effort made by BLM to identify potential lands with wilderness characteristics, the method by which these areas were identified and the failure of BLM to verify the preliminary findings in the field has led to significant errors which, until rectified, render the inventory unfit to inform planning decisions. Specifically, we found two major issues arising from the preliminary inventory that should be addressed as BLM refines and updates the LWC inventory:

1) **Many parcels were entirely missed by the desktop inventory.** Possibly because the BLM's desktop inventory was based on an out-of-date or inaccurate road layer, the resulting collection of potential LWC polygons was deficient and missed several blocks of BLM lands that could qualify as LWCs. BLM Manual 6310 makes clear that the size criterion for wilderness can be met for areas less than 5,000 acres if those parcels are contiguous with areas that have been formally identified to have wilderness or potential wilderness values (Manual 6310, pp. 5-6). Our inventory shows that several units that meet the above criterion—including parcels adjacent to Black Mountain/Windy Gulch WSA, Willow Creek WSA, Bull Canyon WSA, Oil Spring Mountain WSA, as well as parcels along the Colorado/Utah state line which abut parcels which the Vernal Field Office has identified as containing wilderness character—were not identified in the desktop inventory. Our inventory shows that these areas not only meet the size criterion, but also the additional criteria for Lands with Wilderness Characteristics.

2) **The 30 potential LWC units that were identified are often defined by boundaries that do not meet the criteria for boundary delineation laid out in BLM Manual 6310.** Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" (Manual 6310, p. 4). BLM defines a wilderness inventory road as a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). A "way" that is either solely "maintained" by the passage of vehicles, is used regularly but not maintained, or was originally constructed using mechanical means *but is no longer being maintained by mechanical methods* is *not* a road (*Ibid.)*. Without conducting field visits to these areas with the express intent of assessing whether or not the proposed boundary line meets the definition of a "wilderness inventory road" or other defining feature, it is very difficult to draw an accurate boundary for a potential LWC unit.

Because the majority of the BLM's potential LWC units have not been physically inventoried to assess whether the assumptions made in the desktop inventory process about boundary features were correct, the proposed boundaries for these units contain numerous mistakes. Many "roads" that were used as boundaries for units do not meet the criteria

for a “wilderness inventory road” as defined by BLM Manual 6310. Further, several of the boundaries are drawn on areas where no road or route exists *at all*.

In order to document which roads within, and delineating the boundaries of, the potential LWC units met the criteria for Wilderness Inventory Roads, and to document the evidence for such determinations, The Wilderness Society and Conservation Colorado spent the summer and fall of 2012 visiting each of the potential LWC units in the field office. During these visits we utilized new technologies, including Apple iPads, to collect geotagged photographs of the boundaries, routes, ways and human impacts of each unit. During this time, we inventoried over 300,000 acres of BLM lands, taking over 1,200 geotagged photos in the process and making road determinations on hundreds of routes and ways. Using iPads and their internal GPS units allowed us to precisely assess where the BLM’s desktop inventories occurred on the ground and to document if and where these boundaries aligned with qualifying features for boundary delineation, such as routes constructed and maintained using mechanical means to ensure regular and continuous use, substantially noticeable human impacts, and other qualifying features. Because of the scope of this inventory effort and the short time and limited resources available to us to conduct such a large-scale project, some mistakes were undoubtedly made. However, the information collected and provided here is the most extensive inventory effort conducted in the field office to date, and should provide invaluable information to the BLM and the public about the areas within the field office that meet the criteria for LWCs.

We will continue to update or amend our inventory as more information and/or resources become available to us and as conditions on the ground evolve.

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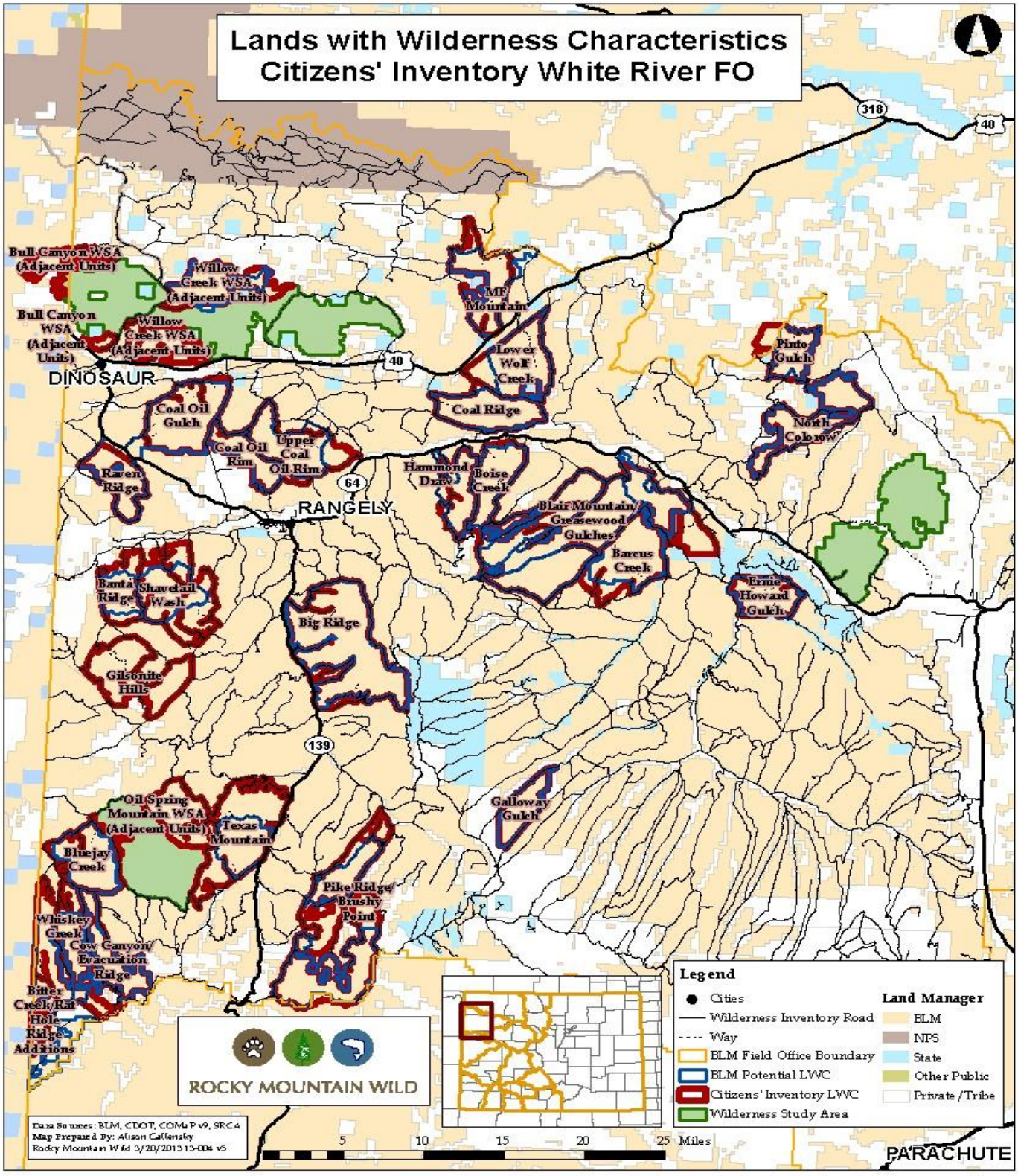
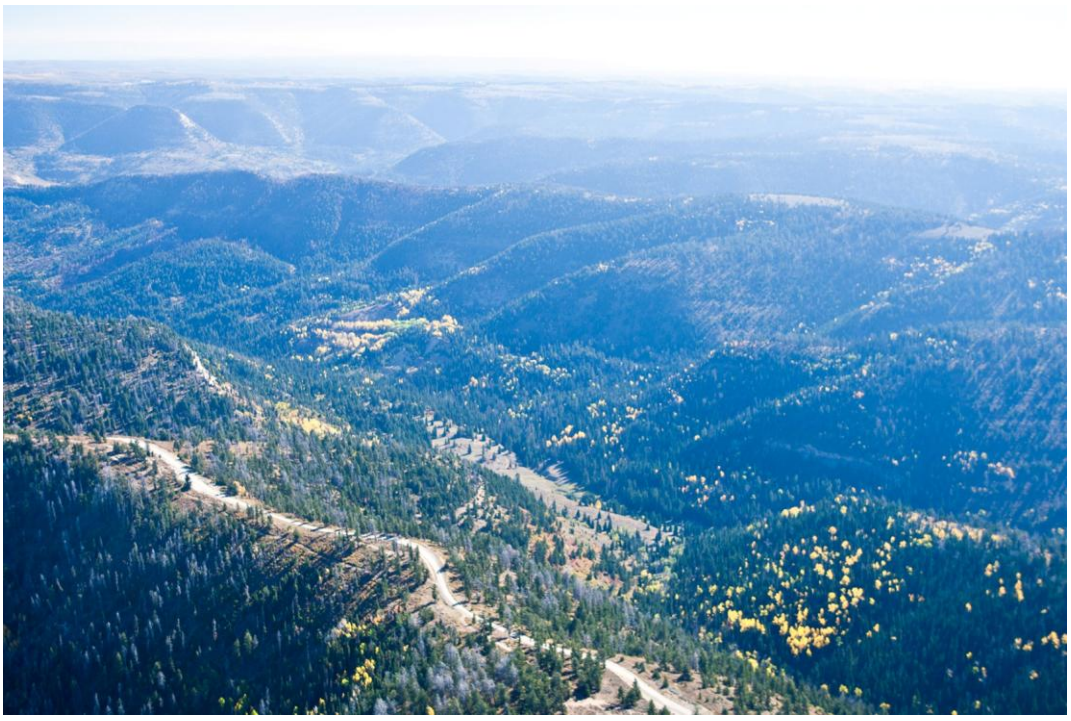
Overview Map of Lands with Wilderness Characteristics in the White River Field Office

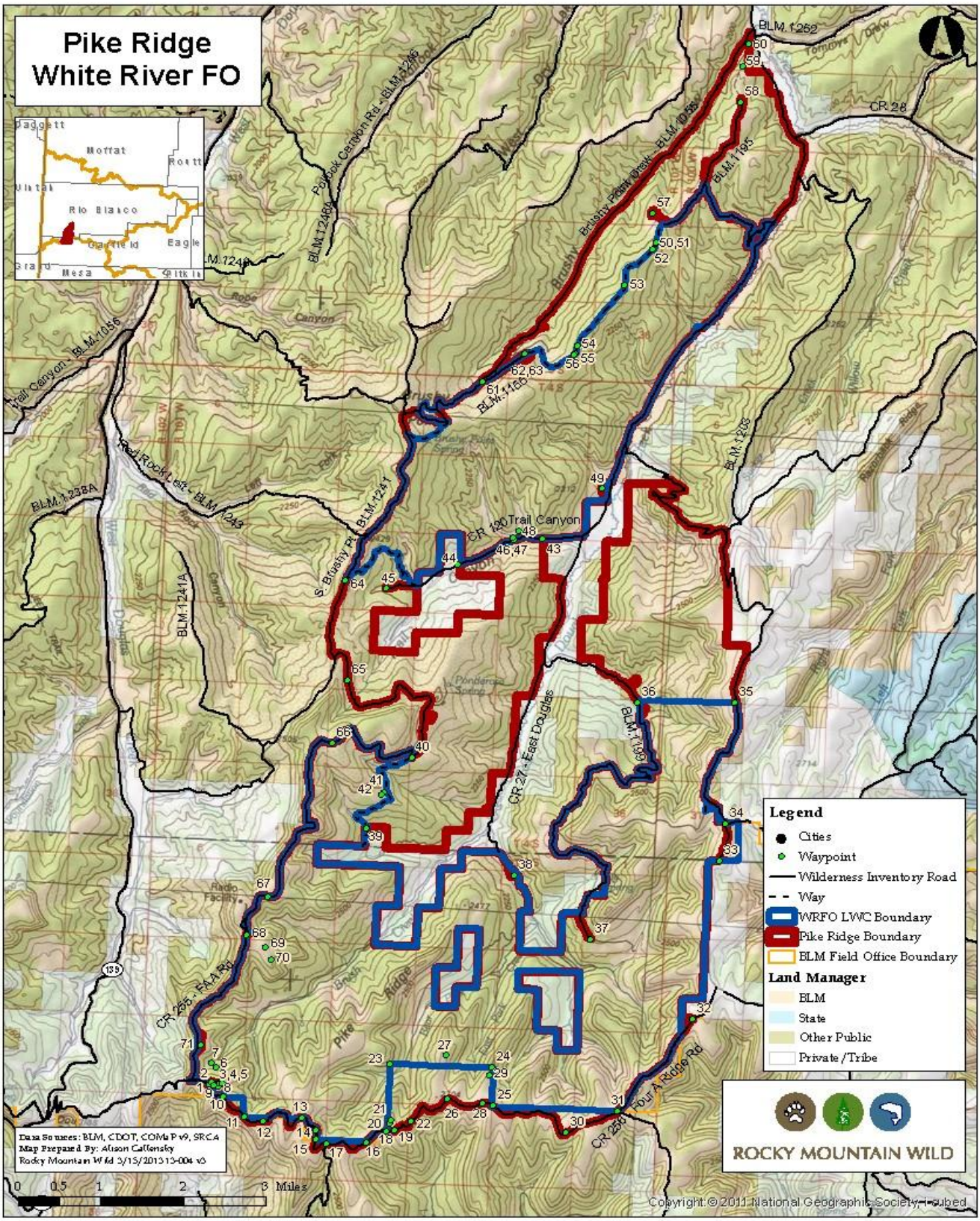


Lands with Wilderness Characteristics Recommendations: Pike Ridge/Brushy Point



Pike Ridge/Brushy Point, White River Field Office *Photo: Todd Patrick*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Pike Ridge
White River FO
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
BLM 1262
CR 28
BLM 1195
BLM 1055
Brushy Plant Draft
Pollock Canyon Rd - BLM 1246
BLM 1248
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BLM 1199
Radio Facility
CR 205 - FAA Rd
Four A Ridge Rd
CR 230
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Boundary
Pike Ridge 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 3/15/2013 13-004 v3
0 0.5 1 2 3 Miles
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Overview and Boundary Delineation:

The proposed Pike Ridge/Brushy Point Lands with Wilderness Characteristics unit (LWC) is a high elevation unit complete with dense pine forests, isolated aspen groves, and perennial, spring-fed creeks. The unit surrounds the upper reaches of East Douglas Creek and divides the White River watershed in the north from the Colorado River watershed to the south. Because of its location, the Pike Ridge/Brushy Point unit contains outstanding wildlife habitats, and as such serves as a popular area during the busy fall hunting seasons. The area is also the home of several rare plants, including the Piceance bladderpod and the large-flower globemallow. Almost the entire unit overlaps with lands designated by the Bureau of Land Management (BLM) as the East Douglas Creek Area of Critical Environmental Concern (ACEC). This ACEC was created to protect "important biologically diverse plant communities, riparian habitats, and Colorado River Cutthroat Trout habitat" (White River Field Office, Final RMP/ROD, 1997).

The Pike Ridge/Brushy Point proposed LWC unit is located near Douglas Pass along the southern boundary of the BLM's White River Resource Area. The unit sits at elevations between around 6,300 and 9,000 feet above sea level and lies in both Garfield and Rio Blanco Counties. The unit is bordered on the west by BLM 1055, BLM 1241, and Garfield County Road 255; on the south by Garfield County Road 256; on the east by private lands and BLM roads 1203, 1203A, and 1016; and on the north by Rio Blanco County Road 27. Numerous parcels of private lands accessed by the cherrystemmed Rio Blanco county Road 27 lie along East Douglas Creek and are cut out from the unit.

From the blue spruce-blanketed north-facing slopes above East Douglas Creek, to the sagebrush and shrub habitats of the lower elevations below Brushy Point, this unit supports a wide-variety of plant and wildlife habitats. Black bears and elk thrive in the upper elevations around Pike Ridge, while mule deer, turkey and numerous small game species can be found at lower elevations of the unit. The outstanding collection of cold, clear streams and seeps which leak out of the shale formations in the southern portions of the unit supply East Douglas Creek and its tributaries with the water that provides habitat for Colorado River cutthroat trout, brook trout and speckled dace, along with regionally important riparian habitats.

Opportunities for solitude and primitive recreation abound in the 26,700 contiguous roadless acres that make up the proposed Pike Ridge/Brushy Point LWC. The long timbered ridges provide solitude among their sheltered forests and scattered meadows, while the numerous small drainages and short draws provide isolation and screen the visitor from nearby activities or other visitors. Primitive recreation is found in the many hunting opportunities that the area's abundant wildlife habitats provide. Backpacking, wildlife-viewing, hiking, and camping opportunities are also present.

In its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012, the BLM's White River Field Office (WRFO) identified two separate units around Pike Ridge and Brushy Point (delineated by the blue line on the attached map) that had the potential to qualify as a LWC units. 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). The BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer that doesn't differentiate between those roads that qualify for Wilderness Inventory Roads under BLM Manual 6310 and those that do not. Therefore, the

boundaries proposed by the BLM in the LWC inventory report contain small inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

During June and October of 2012, The Wilderness Society visited the Pike Ridge/Brushy Point area to conduct an in-depth, on-the-ground field inventory of the BLM's potential Pike Ridge and Brushy Point LWC units. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for LWC boundaries as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made. As a result of these inventories, we concluded that the actual area that qualified as Lands with Wilderness Characteristics was a single unit of 26,700 acres comprised of both the BLM's Pike Ridge and Brushy Point potential LWCs, as well as additional lands. Our findings are detailed below, along with suggested boundary adjustments.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Pike Ridge/Brushy Point proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Pike Ridge/Brushy Point unit comprises a block of 26,700 contiguous roadless acres. 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). Our inventory of the area revealed that in several cases the BLM's proposed boundaries for this unit do not meet the above criteria for WIRs and as such need to be modified; our proposed modifications are detailed below. All Waypoints referred to in the narrative can be seen in the attached photo sheet for Pike Ridge/Brushy Point.

The southern boundary of the Pike Ridge/Brushy Point unit generally follows CR 256 from west to east along the top of the ridge. Along this boundary, there are several user-created or unmaintained routes that travel north into the unit—usually along the finger ridges above the headwaters of East Douglas Creek. At Waypoint 1, a large gravel pile and associated vehicle area should be cut out of the unit. A short route, beginning at this gravel yard, travels up over a small ridge and then switchbacks down towards the headwaters of Brush Creek (Waypoints 2 through 9). At its onset, this route appears to get regular use and may receive regular maintenance as far as the small electrical box located at Waypoint 8. However, after less than 100 yards and just after a primitive campsite at the top of a small hill (Waypoint 3), the character of the route changes significantly. At Waypoint 4, a large pine tree has fallen across the route, blocking forward progress. Some users have opted to drive around this impediment, creating their own route in the process. At Waypoint 5, the route is clearly unmaintained—the route is very narrow and shrubs and trees along its periphery are encroaching heavily into the way. At Waypoints 6 and 7, more fallen timber obstructs vehicular traffic, and no maintenance has been done to clear these impediments; users simply drive over or around the fallen timber. Below Waypoint 7, the route begins to traverse the north banks of Brush Creek and becomes even more overgrown and difficult to follow, and soon comes to a boundary with private lands where public access is denied. This route—which doesn't appear on the BLM's GIS road layer for the area—is not maintained using mechanical means to ensure regular and continuous use, and thus does not qualify as a WIR. The route should be left within the unit.

At Waypoint 12, a small and very short route enters the unit and then fades away. This route is not maintained and has no purpose as it parallels CR 256 for a short distance before disappearing entirely. This route should be left in the unit.

A gated and signed closed route departs CR 256 at Waypoint 13. This route may have once provided access to the now abandoned well location just north of Waypoint 13. This route no longer appears to be maintained using mechanical means; however, it may continue to be used to access a small stock pond along Pike Ridge about a mile to the north. We have opted to leave this route in the unit as a way.

Waypoint 19 marks the beginning of a short route leading north into the unit. This route continues for only around two-tenths of a mile before it dead-ends at an area that appears to be popular for primitive camping (Waypoint 21). Although the route has a purpose of providing access to a small primitive camping area, the route does not appear to be maintained.

At Waypoint 26, a primitive two-track route departs CR 256 and heads north into the unit along a sharp ridgeline. This route, although passable, is rough and unmaintained. At Waypoint 27 the route abruptly ends at a steep lookout point above East Fork Bear Park Creek. Just to the west, another route traverses a similar ridgeline that ends abruptly at an overlook point above East Fork Bear Park Creek (Waypoints 28 and 29). These and other similar routes in the vicinity only travel for a short distance before ending at a primitive campsite or lookout. These routes are not maintained using mechanical means and should be left within the proposed LWC unit as ways.

A non-producing oil and gas well pad is located at Waypoint 30. This pad is overgrown and deteriorating; however, we have opted to cut it out of the unit as the facilities still remaining on the site could be considered substantially noticeable to the casual visitor.

A locked gate prevents public access along CR 256 at Waypoint 32 because of private lands. The boundary for the Pike Ridge/Brushy Point unit should follow this private lands/BLM lands boundary north to Waypoint 33. At Waypoint 34, the boundary should continue north following BLM 1203. At Waypoint 35, the BLM's desktop inventory boundary for this unit makes an abrupt turn off of the ridge and west towards Waypoint 36. It is unclear why the BLM chose to draw the boundary in this way, as there is currently no road or other qualifying feature for an LWC boundary in this area. The boundary line drops steeply down a forested ridge towards the bottom of the canyon. Instead, the boundary should continue north along BLM 1203 and the boundary of the adjoining private lands to BLM 1203A. At BLM 1203A, the boundary should switchback down the apparently maintained route to the intersection with the private lands along East Douglas Creek. At this point, the boundary can continue south following the boundary between private and BLM lands back to BLM 1199 and Waypoint 36.

At Waypoints 37 and 38, active oil and gas well pads exist which should be cherrystemmed into the unit. As the proposed LWC unit boundary follows the intersection of BLM and private lands west around the bottomlands of East Douglas Creek, it eventually reaches the gated and locked BLM route at Waypoint 39. The BLM's desktop inventory proposed that this route be a boundary for the Pike Ridge unit. However, this route, although accessible from Scare Mountain Road (BLM 1242) at Waypoint 40, is listed as closed to motorized vehicles on the current WRFO GIS road layer. The route is very rough, and because it is gated and locked at the bottom, serves no known purpose. The route is unmaintained, rutted, narrow, and sees little use because it dead-ends at a locked gate and has no easy turnaround. This route does not qualify as a Wilderness Inventory Road and should be left in the unit as a way. The BLM's boundary

should be moved east from this unmaintained and apparently closed route. Deleting the non-WIR route between Waypoints 39 and 40 better reflects the reality on the ground for this unit. Doing so results in the combination of two individual potential LWC units—Pike Ridge and Brushy Point, because no WIR or other qualifying boundary feature separates the two units, as far as we could determine.

At Waypoint 43, the BLM's desktop inventory drew a boundary for their Brushy Point unit that follows CR 120 west. This route is constructed and maintained until at least the private lands at the top of Trail Canyon (Waypoint 44). At Waypoint 44, the route crosses into private lands and is gated and signed to prevent public access. Beyond the private lands, a producing oil and gas well pad exists at Waypoint 45. However, rather than cherrystemming this maintained route to the well pad, the BLM continues their boundary north and west up a gated route that is currently closed to motorized vehicles according to the BLM's own GIS road layer (Waypoint 64). This route is not maintained using mechanical means and has no purpose; the private lands at the head of Trail Canyon have graded and maintained access from the east via CR 27. Because this short route section between Waypoint 64 and the private lands along Trail Canyon is currently closed to motorized travel, unmaintained, and has no known purpose, this route does not qualify as a Wilderness Inventory Road. The boundary following this route should be deleted, connecting the Pike Ridge and Brushy Point units as mentioned above.

At the northern end of the Pike Ridge/Brushy Point unit, the BLM's desktop inventory produced a boundary for their Brushy Point unit which follows an unnamed BLM road up out of the East Douglas Creek drainage to the ridge separating East Douglas Creek from Brushy Point Draw. While this route is certainly maintained in order to access several well pad locations, the route does not continue through to Brushy Point Draw as shown in the BLM's desktop inventory boundaries. Just south of the inactive oil and gas well pad at Waypoint 57, the BLM's proposed boundaries continue south and west along the top of the ridge to an eventual junction at another well pad at Waypoint 62. This boundary follows a very rugged and eroding 4WD-only route that receives little use and is clearly unmaintained. At its very onset, this route, labeled BLM 1155 on the WRFO GIS road layer, shows no signs of regular maintenance using mechanical means (Waypoint 50). The route is composed of loose sand and boulders (Waypoint 51) and has numerous locations where efforts have been made to block access through the construction of high berms (Waypoint 54, 55). The route once provided access to several ridgetop oil and gas well pads; however, these well pads have long since been abandoned. The pads are largely reclaimed (Waypoint 52) and the construction of berms along this access route indicates that the route was intended to be closed to vehicular traffic. At the top of BLM 1155, the boundary route has been reclaimed and re-graded to match the original contours of the hillside (Waypoint 56), and is entirely impassable to vehicles of any kind. Because BLM 1155 is impassable and clearly unmaintained beyond the well pad at Waypoint 57, and because the route is also unmaintained and impassable north of the well pad at Waypoint 58, this boundary line (roughly between Waypoints 50 and 63) should be deleted and the boundary moved west to BLM 1055 along the bottom of Brushy Point Draw. This leaves a two-pronged cherrystemmed route between Waypoints 57 and 58 and connecting to CR 27 along East Douglas Creek (see map).

After incorporating the numerous changes proposed above and shown on the attached map, the Pike Ridge/Brushy Point unit contains 26,700 contiguous roadless acres of BLM lands and thus meets the size criterion as outlined in BLM Manual 6310.

II. Pike Ridge/Brushy Point proposed LWC is primarily affected by the forces of nature.

The majority of the Pike Ridge/Brushy Point proposed LWC unit consists of steep, heavily timbered hillsides and long finger ridges jutting out over the East Douglas Creek. Human impacts within the unit include vehicle ways and grazing infrastructure (primarily fencing). The vehicle routes within the unit are generally associated with primitive camping opportunities along the heavily used southern boundary of the unit. The steep topography of this portion of the unit, where Pike Ridge drops steeply into the East Douglas Creek drainage, ensures that these routes are short, often less than a half mile in total length. The vegetation of the bulk of the unit—large pine trees and dense timber—ensures that these routes are heavily screened from each other and from other ongoing activities within the unit.

Several inactive oil and gas well pads have been left within the unit around Trail Canyon and along the ridge separating Brushy Point Draw from East Douglas Creek; all producing or seemingly active well pads have been cut out from the unit entirely. The inactive well pads that remain in the unit are not substantially noticeable to the casual visitor, either individually or collectively. In general, the inactive well pads have been inactive for many years and thus have largely been reclaimed—either through the physical re-contouring and reseeding of the pads and access roads, or simply through natural processes (Waypoint 41, 52). Presently, these well pads have no impact on the apparent naturalness of the unit as a whole and will undoubtedly achieve an ever greater natural appearance with each passing year of inactivity. The Pike Ridge/Brushy Point unit as a whole is primarily affected by the forces of nature and appears natural to the casual visitor.

III. Pike Ridge/Brushy Point proposed LWC provides outstanding opportunities for solitude and primitive recreation.

With its deep and dark forests, long high ridges, and countless narrow draws, opportunities for solitude are easily found in the Pike Ridge/Brushy Point unit. The cloistered nature of the many draws and valleys of the unit offers the visitor isolated pockets where he or she can easily find respite from other activities or visitors to the area. The steep canyon walls significantly limit lines of sight within the unit, which increases the feelings of solitude and isolation, and allows many visitors to enjoy the area without infringing on each other's opportunities for personal solitude or isolation.

Comprised of over 26,000 acres of contiguous unroaded public lands, the Pike Ridge/Brushy Point unit also offers a variety of primitive recreational opportunities. Hunting is immensely popular in the area, and each fall, numerous camps can be found on the periphery of the unit where sportsmen and women gather to participate in one of western Colorado's most cherished traditions. In the summer months, hiking, backpacking, and camping opportunities abound and the high finger ridges which peel off of the divide above East Douglas Creek reward trail runners, horsemen, or the casual aesthete with outstanding views north towards the impressive façade of the Cathedral Bluffs.

VIII. Pike Ridge/Brushy Point proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found Pike Ridge/Brushy Point proposed LWC to contain several supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. Nearly the entire

unit overlaps with the East Douglas Creek Area of Critical Environmental Concern (ACEC). This ACEC was designated by the BLM in order to protect important biologically diverse plant communities, riparian habitats, and Colorado River cutthroat trout habitat. Additionally, the Colorado Natural Heritage Program of Colorado State University identified the only known occurrence of the globally imperiled blue spruce/river birch montane riparian woodland in western Colorado in this area.

The Pike Ridge/Brushy Point unit also provides invaluable migration routes for elk and mule deer as they depart their summer ranges at the highest elevations of the unit and move north and south into the lower country which provides their winter habitats. The area is considered high quality summer range for mule deer and a summer concentration area for elk. The highest ridges of the Pike Ridge/Brushy Point unit have also been identified by Colorado Parks and Wildlife as key production areas for elk. Finally, the Pike Ridge/Brushy Point is also entirely within the Eastern Bookcliffs Master Leasing Plan area (MLP) that the BLM accepted as an MLP in 2011.

Summary Conclusion

Our extensive on-the-ground inventory of the Pike Ridge/Brushy Point unit shows that the BLM was correct in identifying this area as one that could qualify as Lands with Wilderness Characteristics. The boundaries created through the BLM's desktop inventory of potential LWCs is largely correct for this unit. The one exception is along the eastern boundary of the unit, where a boundary was drawn along BLM 1736—an unmaintained and rarely used route that no longer qualifies as a Wilderness Inventory Route for LWC boundary delineation purposes. Two additional boundary changes are proposed for the northern boundary of the unit. With its relatively large size, lack of significant human impacts, and convoluted topography, Pike Ridge/Brushy Point has apparent naturalness and outstanding opportunities for both solitude and primitive and unconfined recreation.

Our inventory has documented necessary boundary adjustments as well as the wilderness characteristics of the area. It is imperative that the BLM now do the same, before any land management decisions are made that might degrade these qualities

This overview provides new information, including maps and photos, documenting that the 26,700-acre Pike Ridge/Brushy Point unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Pike Ridge/Brushy Point Photopoints

The following photographs correspond with the numbered icons on the attached Pike Ridge/Brushy Point unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Pike/Brushy (1) - N

Pike/Brushy (2) - E

Pike/Brushy (3) - NE

Pike/Brushy (4) - W

Pike/Brushy (5) - NE

Pike/Brushy (6) - N

Pike/Brushy (7) - E

Pike/Brushy (8) - E

Pike/Brushy (9) - W

Pike/Brushy (12) - N

Pike/Brushy (13) - N

Pike/Brushy (14) - NE

Pike/Brushy (17) - NE

Pike/Brushy (19) - N

Pike/Brushy (20) - N

Pike/Brushy (21) - N

Pike/Brushy (22) - N

Pike/Brushy (26) - WNW

Pike/Brushy (27) - NE

Pike/Brushy (28) - N

Pike/Brushy (29) - N

Pike/Brushy (30) - N

Pike/Brushy (32) - N

Pike/Brushy (41) - S

Pike/Brushy (42) - S

Pike/Brushy (44) - W

Pike/Brushy (46) - N

Pike/Brushy (47) - NE

Pike/Brushy (48) - N

Pike/Brushy (50) - N

Pike/Brushy (51) - N

Pike/Brushy (52) - S

Pike/Brushy (53) - N

Pike/Brushy (54) - N

Pike/Brushy (55) - N

Pike/Brushy (56) - N

Pike/Brushy (59) - N

Pike/Brushy (60) - S

Pike/Brushy (61) - NE

Pike/Brushy (62) - NE

Pike/Brushy (63) - N

Pike/Brushy (64) - NE

Pike/Brushy (65) - S

Pike/Brushy (66) - S

Pike/Brushy (67) - E

Pike/Brushy (68) - SE

Pike/Brushy (69) - SE

Pike/Brushy (70) - ENE

Pike/Brushy (71) - N

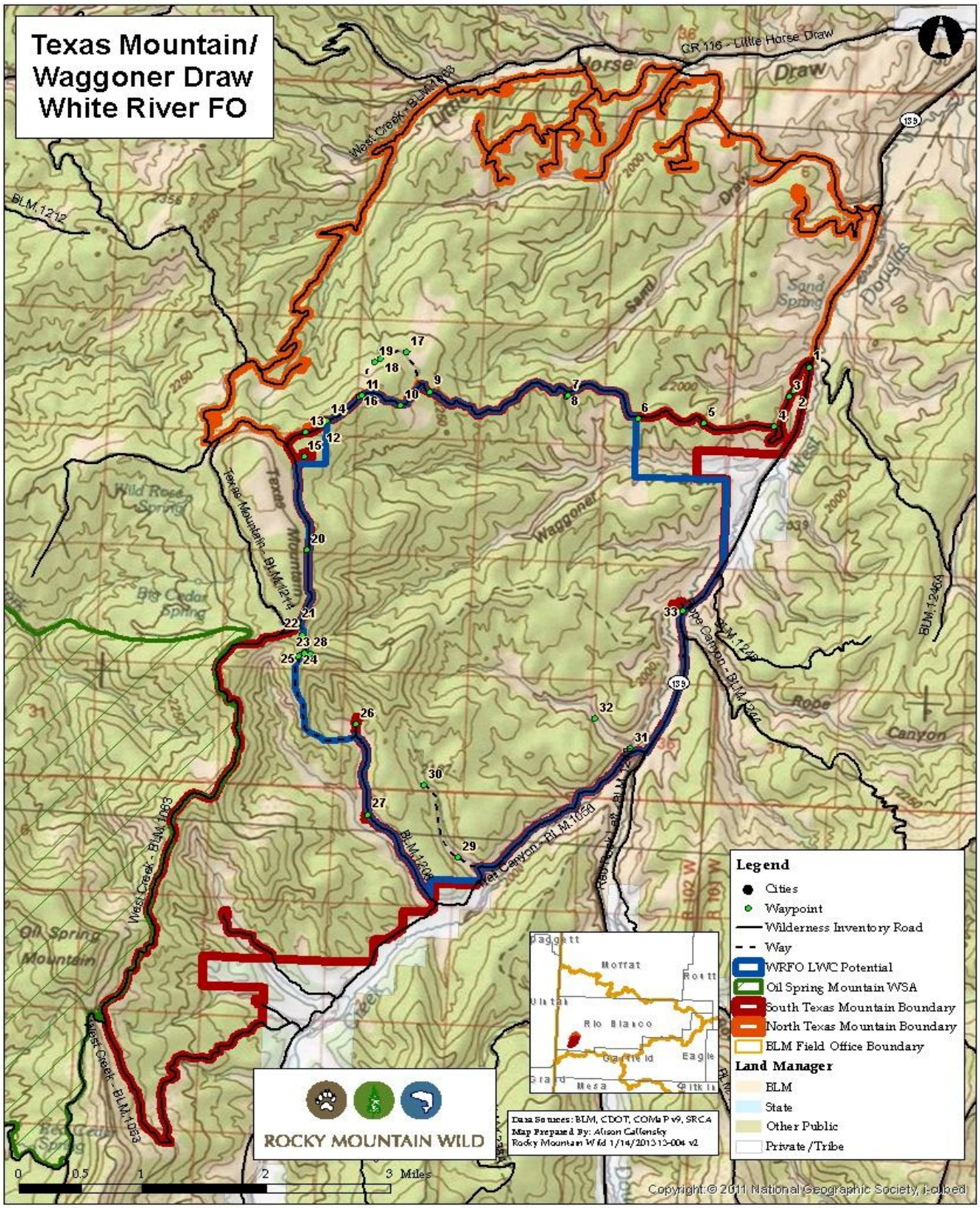
Pike/Brushy (72) - Solitude

Pike/Brushy (73) - Solitude

Lands with Wilderness Characteristics Recommendations: Texas Mountain

Waggoner Draw, Texas Mountain, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Texas Mountain/
Waggoner Draw
White River FO
CR 116 - Little Horse Draw
Horse Draw
West Creek - BLM 1063
BLM 1212
Sand Spring
Douglas
Waggoner
West
Wild Rose Spring
Texas Mountain - BLM 1214
Texas Mountain
Big Cedar Spring
Rope Canyon - BLM 1249
BLM 1246A
Rope Canyon
Oil Spring Mountain
West Creek - BLM 1063
BLM 1204
Rose Canyon - BLM 1050
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Oil Spring Mountain WSA
South Texas Mountain Boundary
North Texas Mountain Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private /Tribe
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
Data Sources: BLM, CDOT, COMaP v9, SRC4
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 1/14/2013-13-004 v2
ROCKY MOUNTAIN WILD
0 0.5 1 2 3 Miles
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Overview and Boundary Delineation:

Texas Mountain proposed Lands with Wilderness Characteristics unit (LWC) is a roughly 16,900 acre unit located about 30 miles south of Rangely, Colorado, near Douglas Pass in Rio Blanco County. The unit is made up of the easterly facing aspects of Texas Mountain—a prominent highpoint in the area which rises to nearly 8,500 feet in elevation. From the summit of Texas Mountain, several major drainages including Waggoner Draw, Sand Draw, Mail Box Draw, Texas Draw, and Round Mountain Canyon drain through the unit and east toward West Douglas Creek. The unit is separated from the existing Oil Spring Mountain Wilderness Study Area by BLM road 1063.

Texas Mountain's proposed boundaries are formed by BLM road 1063 to the west, BLM 1056 and private lands to the south, Colorado Highway 139 and private lands to the east, and the significant oil and gas development and associated facilities along Little Horse Draw to the north.

Texas Mountain sits at an elevation of between 6,200 and 8,100 feet; this significant variety of altitudes, combined with the fractured topography of the area, provides habitat for a wide variety of plant communities. The uppermost reaches near the summit of Texas Mountain contain healthy aspen stands, and Douglas fir is prominent throughout the upper draws and ridges. As one descends the numerous drainages, pinyon-juniper and understory grasses become dominant, with scattered pockets of mountain mahogany and gamble oak. Sagebrush is common in the lower elevations of the unit. This wide variety of habitats creates a unique ecological community; its significant topographical relief provides a diverse range of habitats for both plant and animal species. Texas Mountain provides home to black bear, mule deer, and elk as well as badger, eagles, and wild horses.

With Canon Pintado National Historic district to the west and the Oil Spring Mountain/Texas-Missouri-Evacuation Creek area to the east, Texas Mountain South sits in a highly significant region for cultural resources, including regionally outstanding collections of petroglyphs, pictographs, and prehistoric sites.

Human impacts to the Texas Mountain LWC unit are substantially unnoticeable, with the exceptions being those associated with nearby intensive oil and gas development along the northern boundary of the unit along Little Horse Draw,. The unit's topography makes access difficult, and outside of the hunting season, the unit sees little human activity. The deep drainages such as Waggoner and Right Fork Draws provide outstanding opportunities for solitude and primitive and unconfined recreation such as hunting, hiking, and backpacking.

Texas Mountain was identified by BLM's White River Field Office (WRFO) as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In their report, the BLM identified an area of 6,800 acres around Waggoner Draw (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in their LWC inventory report contain several inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During May and October of 2012, The Wilderness Society visited the Texas Mountain area to conduct an in-depth, on-the-ground field inventory of the potential Texas Mountain LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the definitions provided in the BLM Manual, and to gather data on the wilderness characteristics of the unit after any adjustments to the boundary were made. In this particular case, TWS identified significant adjustments that should be made to the northern and southern boundaries of BLM's potential LWC unit in order to bring it in line with the policies laid out in Manual 6310—resulting in an increase in size of the potential LWC unit from the BLM's 6,800 acres to a more accurate 16,900 acres. Only after taking this new boundary into account can a more complete picture of the area's outstanding wilderness character be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Texas Mountain proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Texas Mountain unit comprises a block of 16,900 contiguous roadless acres which includes the BLM's originally proposed desktop inventory unit of 6,800 acres, plus additions to the north and south that comprise an additional 6,800 and 3,300 acres respectively. 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 (Wilderness Inventory Road). 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 Texas Mountain 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 Texas Mountain.

The most significant boundary adjustment we are proposing here is to move the BLM's proposed northern boundary of the unit further north, from BLM 1204 to the cherrystemmed oil and gas roads and active well pads along Little Horse Draw. Although BLM 1204 is a numbered and signed open BLM road (Waypoint 1), and was obviously originally constructed using mechanical means, the route no longer appears to receive any regular maintenance using mechanical means to ensure regular and continuous use. Only the westernmost portion of the route is shown on the BLM's "Douglas Pass" 1:100,000-scale topographic map; the map shows the route terminating at the abandoned well south of Waypoint 8. In both of our visits during the spring and fall of 2012, this route was impassable to passenger vehicles because of major erosion (Waypoints 3 and 4) and overgrown roadside vegetation (Waypoints 9 and 11). It was clear that this route has not been maintained using mechanical means in some time, if at all (Waypoints 2, 3, 5, 9, and 10). The eastern end of this route as it approaches BLM 1063 is very steep, extremely rough, and does not appear to be maintained to ensure regular or continuous use. At Waypoint 10 the route heads west directly up a very steep incline

for nearly 200 yards; loose boulders, deep erosional runnels and scattered timber can be found for the length of this segment. Just beyond the steep section at Waypoint 10, and at the top of the hill, the route is so overgrown as to be nearly too narrow for even ATVs to pass through (Waypoint 11). It is clear that this route sees little use and is not regularly maintained. Instead of acting as a boundary for the unit, BLM 1204 should be cherrystemmed from the west for one quarter mile to the active oil and gas well near Waypoint 12. Along with Waypoints 10 and 11, Waypoint 12 shows that the route east of the well pad is not maintained. During our visit in October of 2012, we did find evidence of use by hunting parties using ATVs;, however, that use would not be limited by closing this route, as easy access is available at both the eastern and western ends of 1204 using paved Highway 139 or the bladed and maintained West Creek Road (BLM 1063) from Little Horse Draw. Even if the BLM somehow determines that the BLM 1204 does in fact qualify as a WIR, both of the units on either side of BLM 1204 are larger than 5,000 contiguous unroaded acres of BLM lands and individually meet the size criteria for an LWC.

On the southwestern boundary of the BLM's proposed Texas Mountain unit, the BLM has drawn a boundary line south and east from BLM 1063 to the oil and gas well pad access road BLM 1208. Although this line was drawn along a route that is shown on the BLM WRFO road layer as open to motorized use, there currently exists nothing resembling a road along this line (Waypoint 24). At one point this may have been a Right-of-Way for a pipeline. However it is unclear if this right-of-way is still serving a purpose or if the pipeline is still operable; the route is completely overgrown with fully mature shrubs and bushes (Waypoint 23 and 24) and is completely unnoticeable. Until more information is known about the right-of-way status of this boundary segment, we have chosen to cherrystem this boundary from the south to the terminus of BLM 1208 at the South Douglas Creek well #7334. We also moved the boundary west and south so that it follows BLM 1063 along the east face of Oil Spring Mountain and then east, circumventing the private lands and active well pad along West Creek.

The final major boundary adjustment is at the northeast corner of the BLM's proposed boundary at Waypoint 6 on the attached map. Here the BLM has drawn a boundary that departs the aforementioned BLM 1204 and heads directly south across Waggoner Draw, where it then makes a right angle to the east to its intersection with private lands along West Douglas Creek. This right angled boundary mimics the private property boundary line further west; however it is unclear why the BLM chose to place the boundary here. The boundary should follow the private land to the west as there are no WIRs or other existing qualifying boundary features in Waggoner Draw itself.

In addition to the proposed changes to the BLM's proposed boundary for the Texas Mountain unit, several ways located within the unit are worth noting here. Waypoint 8 is looking down an overgrown and out-of-use route leading a short distance south to an abandoned wildcat well above Right Fork Waggoner Draw. The road has no current purpose, is deteriorating significantly, and sees no maintenance to ensure its passability. The well pad at its terminus is nearly entirely reclaimed and recontoured. This route does not qualify as a WIR.

At Waypoint 16, a road was once constructed to provide access to a well pad; this well is now plugged and abandoned and the access road is no longer maintained (Waypoint 16).

The BLM's GIS road layer shows a forked spur route that departs BLM 1204 near Waypoint 9. This route heads north and then forks into two branches—one heading northeast and the other to the northwest. The northeastern branch may have once provided access to a small stock pond to the northeast; however, in October of 2012 the route was

nearly entirely invisible on the ground (Waypoint 17). The northwestern route also appears to have once provided some access to a cattle pond; however, this route is currently unmaintained to the point that it is almost too narrow for ATVs (Waypoint 18). Further along, the route fades away completely and fallen timber blocks passage to the cattle pond (Waypoint 19).

At Waypoint 21 a constructed route departs BLM 1063 and heads south and then east through a single switchback and down to an abandoned oil and gas well at the head of Waggoner Draw. This route is no longer maintained (Waypoints 21 and 28) as the well pad was never constructed and the well location has been abandoned since at least 2004. This is not a WIR and should remain inside of the unit.

Finally, along BLM 1056 there are two routes heading northwest up small drainages into the Texas Mountain Unit. Waypoints 29 and 30 are along an old route leading to two oil and gas well pads. Both of these wells have been plugged and abandoned for years and both well pads and have undergone extensive reclamation. While the route is still passable, it no longer has any purpose and is becoming eroded and overgrown in sections. Some remnant pipes and tanks exist near the terminus of this route (Waypoint 30); however, they are out of use and substantially unnoticeable unless standing directly in front of them. This route is not a WIR and should be closed and reclaimed like the well pads to which it once led.

Waypoints 31 and 32 are along a route once built to provide access to a well pad in Mail Box Draw. This well was abandoned more than a decade ago and is no longer active. The road is washed out and mature vegetation is now found throughout the road bed (Waypoint 32). This route does not qualify as a WIR.

The Colorado Department of Transportation gravel pit at Waypoint 33 was included within the BLM's desktop inventory boundaries of the Texas Mountain unit. This gravel pit is substantially noticeable and should be cut out of the unit.

After incorporating the three boundary changes listed above and shown on the attached map, the Texas Mountain unit contains 16,900 contiguous roadless acres of BLM lands and thus meets the size criteria as outlined in BLM Manual 6310.

II. Texas Mountain proposed LWC is primarily affected by the forces of nature.

Because of the very rugged nature of the numerous draws that make up the Texas Mountain proposed LWC unit, access is difficult and use of the unit is primarily limited to the highest elevations near the summit of Texas Mountain, and the lowest elevations near Colorado Highway 139. The unit contains a wide variety of topographical relief providing a unique diversity of vegetation types—from aspens and firs at the highest reaches, down through pinyon-juniper woodlands to sagebrush flats at the lowest elevations.

The Texas Mountain area has long been an area of oil and gas exploration. However, excepting the development along the northern portion of the unit in Dragon Trail Field along Little Horse Draw, the majority of the exploration in this area has been exploratory in nature and has resulted in dry or abandoned wells. Much of this development is very old and as such the drill holes and ways are long since reclaimed to a substantially unnoticeable state (see Waypoints 16, 24, and 32 for examples). The significant oil and gas development along Little Horse Draw is cherrystemmed or cut out of the proposed LWC unit altogether, and because of Little Horse Draw's location below and to the north of the majority of the

Texas Mountain unit, these facilities and their associated activities do not degrade the overall naturalness of the unit. Because of these facts, and the overall size of the unit, the comprehensive picture of the Texas Mountain proposed LWC unit is one of an area that retains its natural integrity and is primarily affected by the forces of nature.

III. Texas Mountain proposed LWC provides outstanding opportunities for solitude and primitive recreation.

Because of the wide variety of topography and steep relief between ridges and drainages, an outstanding sense of solitude can be found in the Texas Mountain unit with little effort. From the dense pine forests at the upper reaches, to the undulating pinyon and juniper-covered ridges lower down, the area is rife with vegetation that screens the visitor from other sights and sounds and provides a deep sense of isolation and solitude at almost any point within the unit (Waypoint 34). Primitive recreation is primarily centered around the big game hunting season in the fall as large mule deer are common in the area. However, hiking, backpacking, and wildlife viewing—particularly of the popular wild horse herds in the area—are also possible.

VIII. Texas Mountain proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen* found Texas Mountain proposed LWC to contain important supplemental values that contribute to the wildness of the area and provide additional evidence of the area's wilderness characteristics including naturalness and opportunities for primitive recreation. Mule deer and black beer are common in the unit. The upper reaches of Texas Mountain provide summer range for mule deer and elk and are summer and fall concentration areas for black bear. Wild horses are found throughout the unit and active golden eagle nest sites are found along Round Mountain Canyon and West Douglas Creek.

Summary Conclusion

The BLM was correct in identifying Texas Mountain as potential Lands with Wilderness Characteristics in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from 2012. However, our extensive field inventory of the Texas Mountain proposed LWC shows that that the boundaries for Texas Mountain need updating to reflect the on-the-ground realities of the unit. The block of contiguous roadless acreage is closer to 16,900 acres, and includes areas to the north and south of the BLM's potential LWC unit. Our inventory of this larger Texas Mountain proposed LWC shows it to have outstanding wilderness characteristics—including naturalness and unique opportunities for solitude and primitive recreation. In a regional setting of increasingly intensive oil and gas development, Texas Mountain and its adjacent neighbor Oil Spring Mountain, provide an island of refuge for wildlife, recreation, and solitude. Protecting the wilderness characteristics and roadless nature of this unit will help preserve these significant features and add some balance to the ongoing industrial-scale development in the immediate area.

This report provides new information, including maps and photos, documenting that the 16,900 acre Texas Mountain unit meets wilderness criteria. This area deserves to be recognized as Lands *with Wilderness Characteristics* and its wilderness values protected.

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.

Texas Mountain Photopoints

The following photographs correspond with the numbered icons on the attached Texas Mountain map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

TEXAS MTN (1) - W

TEXAS MTN (2) - SW

TEXAS MTN (3) - S

TEXAS MTN (4) - W

TEXAS MTN (5) - W

TEXAS MTN (7) - ESE

TEXAS MTN (8) - S

TEXAS MTN (9) - W

TEXAS MTN (10) - WNW

TEXAS MTN (11) - E

TEXAS MTN (12) - ENE

TEXAS MTN (15) - E

TEXAS MTN (16) - S

TEXAS MTN (17) - NE

TEXAS MTN (18) - SW

TEXAS MTN (19)- SW

TEXAS MTN (20) - S

TEXAS MTN (22) - S

TEXAS MTN (23) - N

TEXAS MTN (24) - S

TEXAS MTN (25) - SE

TEXAS MTN (28) - SE

TEXAS MTN (29) - S

TEXAS MTN (30) - NW

TEXAS MTN (31) - NW

TEXAS MTN (32) - W

TEXAS MTN (33) - W

TEXAS MTN (34) – Scenic, Solitude

TEXAS MTN (35) – Scenic, Oil Spring Mountain

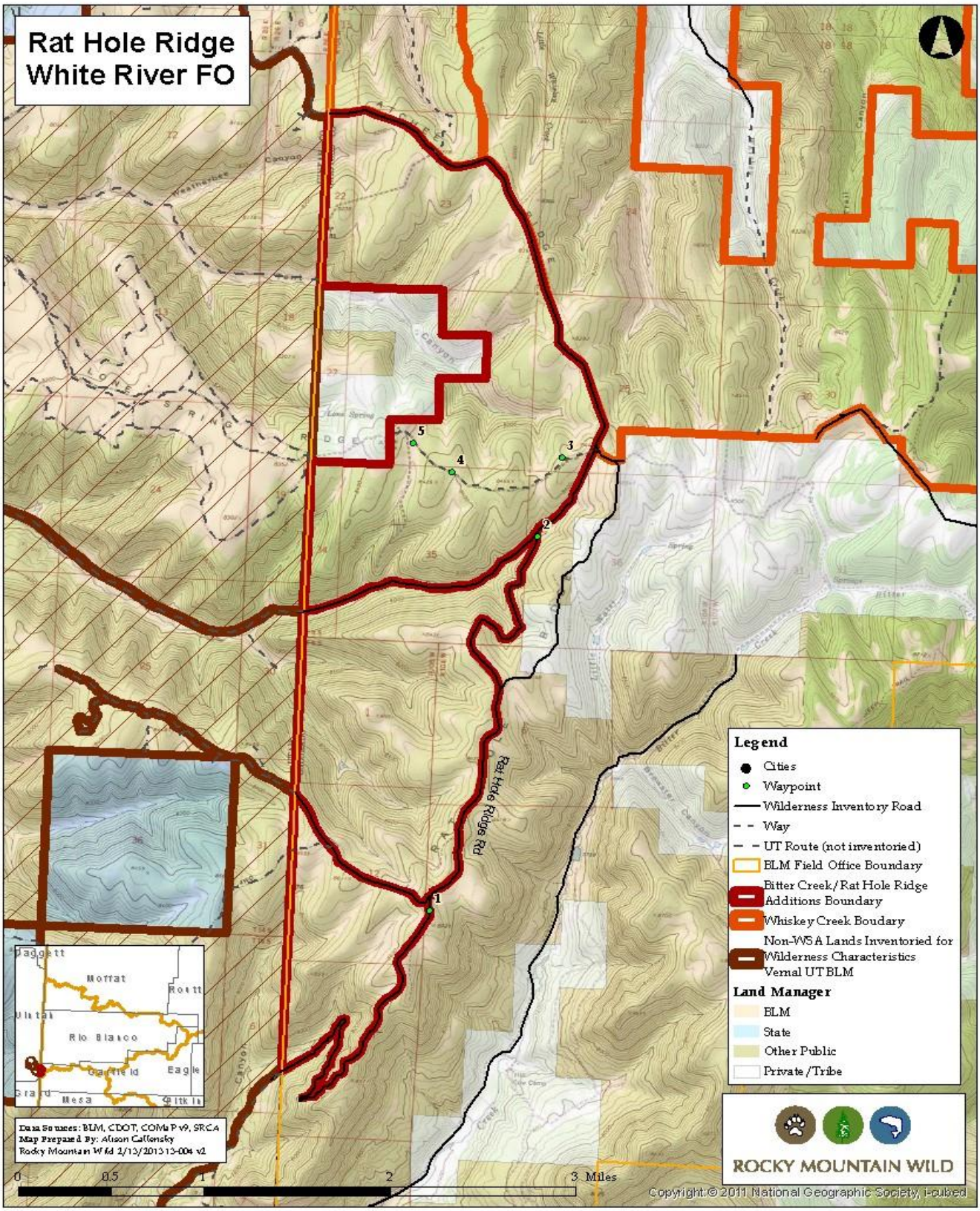
TEXAS MTN (36) – Scenic, Solitude

Lands with Wilderness Characteristics Recommendations:

Rat Hole Ridge

Bitter Creek, Utah *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Rat Hole Ridge
White River FO
Rat Hole Ridge Rd
1
2
3
4
5
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
UT Route (not inventoried)
BLM Field Office Boundary
Bitter Creek/Rat Hole Ridge Additions Boundary
Whiskey Creek Boudary
Non-WSA Lands Inventoried for Wilderness Characteristics Vernal UT BLM
Land Manager
BLM
State
Other Public
Private/Tribe
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Callensky
Rocky Mountain Wild 2/13/2013-13-004 v2
0
0.5
1
2
3 Miles
ROCKY MOUNTAIN WILD
Copyright © 2011 National Geographic Society, i-cubed

Overview and Boundary Delineation:

The Rat Hole Ridge proposed Lands with Wilderness Characteristics (LWC) unit is located in the remote western edge of Colorado, abutting the Utah border. Although only 3,100 acres lie within the state of Colorado, the unit lies adjacent to the Bitter Creek proposed Wilderness unit in Utah—an area that was found to contain wilderness characteristics by the BLM's Vernal Field Office.

The Rat Hole Ridge unit is roadless, natural and offers outstanding opportunities for solitude and primitive and unconfined recreation. The Colorado portion of the unit represents an extension of the Wilderness characteristics documented in the BLM Vernal Field Office's *Wilderness Characteristics Review* for Rat Hole Ridge.

An extension of the proposed Bitter Creek Wilderness in Utah, the proposed Rat Hole Ridge LWC unit is in Garfield County, Colorado. The unit, which surrounds the Book Cliffs Mountain Browse Instant Study Area, contains spectacular scenic vistas and sublime solitude. Deep canyons cut through the pale Mesa Verde sandstone and crenellated ridges buttress the sky. Within the unit, elevations range from 6,000 to 8,000 feet, and canyon slopes rise 600 to 800 feet. Bitter Creek and Rat Hole Canyon, two major drainages, wind through the area, each extending a number of side canyons like fingers into the surrounding mesas.

Vital riparian zones support box elders and aspens, willows, sedges, and various reptile and amphibian species along the waterways in the canyon bottoms. Many wet meadow areas punctuate the folded landscape and support communities of grasses, wildflowers, insects and birds. At lower elevations, bench- and ridge-top vegetation includes sagebrush, rabbitbrush, greasewood, and a variety of grasses. Above 7,400 feet, the drainages are dominated by pinyon-juniper woodlands on south-facing slopes, and by Douglas-firs and quaking aspens on the northern aspects. Peregrine falcons and golden eagles nest in the cliffs and hunt in the river drainages; deer and elk forage along the mesa tops and in the canyons; and black bears roam the broken terrain.

With its convoluted topography, screening vegetation, and wide variety of plant and animal species, the Rat Hole Ridge unit provides outstanding opportunities not only for solitude, but also for primitive and unconfined recreation. Hunting, fishing, camping, hiking, photography and wildlife viewing are all popular in the area, and backpacking and horseback riding opportunities are abundant, given the unit's size and its many scenic side canyons.

In addition to the inspiring scenery and vital habitat, a number of pictograph and petroglyph sites, as well as historic homesteads, grace the area, lending it archaeological and historical significance. Queen Chipeta, wife of Ute Chief Ouray, was intelligent, talented, and hardworking, a model of constancy and courage during a desperate time. She acted as a messenger of goodwill between Indians and Whites, meeting with President McKinley and performing many acts of kindness and sacrifice, earning her place among tribal leaders. Her eponymous canyon traverses the heart of the Bitter Creek Wilderness in Utah and provides access to many side canyons, and her legend informs the rich cultural heritage of the area.

During September of 2012, The Wilderness Society visited the Rat Hole Ridge area to conduct an in-depth, on-the-ground field inventory of the Rat Hole Ridge LWC unit. Our goal was to assess whether contiguous acres of unroaded BLM lands abutted the portions of the Bitter Creek proposed wilderness in Utah that the BLM Vernal Field Office found contained the wilderness characteristics of size, naturalness, and opportunities for solitude or primitive and unconfined

recreation. As a result of this inventory, we concluded that three separate parcels, totally approximately 3,100 acres west of the Atchee Ridge and Rat Hole Ridge roads, do in fact meet these criteria and should be considered for protection as Lands with Wilderness Characteristics.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Rat Hole Ridge proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Rat Hole Ridge unit is made up of three separate blocks of contiguous roadless acres totaling approximately 3,100 acres. BLM's Manual 6310 states that the size criteria for Lands with Wilderness Characteristics can be met for units less than 5,000 acres when "they are contiguous with lands which have been formally determined to have wilderness or potential wilderness values". Utah's Rat Hole Ridge unit, which abuts this unit, was found to contain wilderness characteristics by the BLM's Vernal Field Office and as such the size criterion is met in this instance.

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). One route within the northernmost parcel of the Rat Hole Ridge unit deserves mentioning here. At Waypoint 3, a short and exceedingly rough route leaves Atchee Ridge Road and heads west towards a small parcel of private property along the Utah border. This route has three distinct berms where somebody, presumably the BLM, has attempted to barricade the road to prevent vehicle entry (Waypoints 3, 4). In addition, the route is clearly unmaintained—large ruts exist throughout the route and the surface has shifted and tilted for a lack of blading (Waypoint 3). The route is gated and locked at the entrance to the private property and no turnaround exists where vehicles can easily turn around to exit the area. It is unclear whether a right-of-way exists here, but if not, this route does not meet the criteria for a Wilderness Inventory Road and should be left within the unit. All photopoints referred to in the narrative above can be seen in the attached photosheet for Rat Hole Ridge.

II. Rat Hole Ridge LWC is primarily affected by the forces of nature.

The BLM's Wilderness Characteristics Review for the Rat Hole Ridge unit in Utah found the area to be primarily affected by the forces of nature and to have apparent naturalness to the casual visitor. The imprints of man within the unit both on the Utah side and in Colorado are substantially unnoticeable. The Colorado portion of the proposed wilderness includes upper Tent and Rat Hole Canyons, where the vegetation varies from sagebrush, rabbitbrush, greasewood and a variety of grasses to pinyon-juniper woodlands, Douglas-fir and aspens. Wildlife species in the area include peregrine falcon, golden eagle, deer, elk, black bear, Townsend's big-eared bat, dwarf shrew, ringtail cat, Lewis' woodpecker, and ferruginous hawk. The only significant human impacts on the Colorado side of the unit are roads, and all of the roads that are substantially noticeable and qualify as WIRs for boundary delineation purposes have been excluded from the unit. The proposed Rat Hole Ridge LWC unit, like its adjacent neighbor across the Utah state line, has apparent naturalness and is primarily affected by the forces of nature.

III. Rat Hole Ridge LWC provides outstanding opportunities for solitude and primitive recreation.

The BLM Vernal Field Office's assessment of the Rat Hole Ridge unit was that the area contained opportunities for solitude *and* primitive and unconfined recreation. They pointed out that the area's deep canyons and high forested ridges provide exceptional opportunities for solitude, while the area's outstanding opportunities for primitive and unconfined recreation included hunting, hiking, horseback riding, and other non-motorized recreation. The Colorado portion of the Rat Hole Ridge unit is a continuation of the natural landscape and provides additional opportunities for solitude and primitive and unconfined recreation beyond those that exist down canyon in Utah.

VIII. Rat Hole Ridge LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found Rat Hole Ridge proposed LWC to contain supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. The most outstanding of these are the hunting opportunities in the region. The Atchee Ridge area, including Rat Hole and Tent Canyons, is highly prized among hunters as large elk and mule deer are consistently taken in the area. On the Colorado side, the Rat Hole Ridge unit is recognized by Colorado Parks and Wildlife as a fall concentration area for black bears and overlaps with production areas for elk. Finally, the Rat Hole Ridge unit is located within the Eastern Bookcliffs Master Leasing Plan (MLP) area, which was accepted by the BLM as a MLP in 2011.

Summary Conclusion

Our on-the-ground inventory of the Rat Hole Ridge unit shows that the BLM missed an opportunity to identify this area as one that should be considered as a Lands with Wilderness Characteristics unit. The area abuts lands formally found to contain wilderness characteristics by the BLM Vernal Field Office. The lands on the Colorado side, although not over 5,000 acres in size collectively, inherit the wilderness characteristics of the lands in the Vernal Field Office, as the only thing separating the areas is the Utah/Colorado state line.

Our inventory has documented suggested boundaries as well as the wilderness characteristics located in the Rat Hole Ridge unit. It is imperative that the BLM give this unit a full inventory to document these and any additional outstanding wilderness characteristics before any land management decisions are made that might negatively affect these resources.

This overview provides new information, including maps and photos, documenting that the 3,100-acre Rat Hole Ridge unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Rat Hole Ridge Photopoints

The following photographs correspond with the numbered icons on the attached Rat Hole Ridge map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Rat Hole Ridge (1) - NW

Rat Hole Ridge (3) – WSW

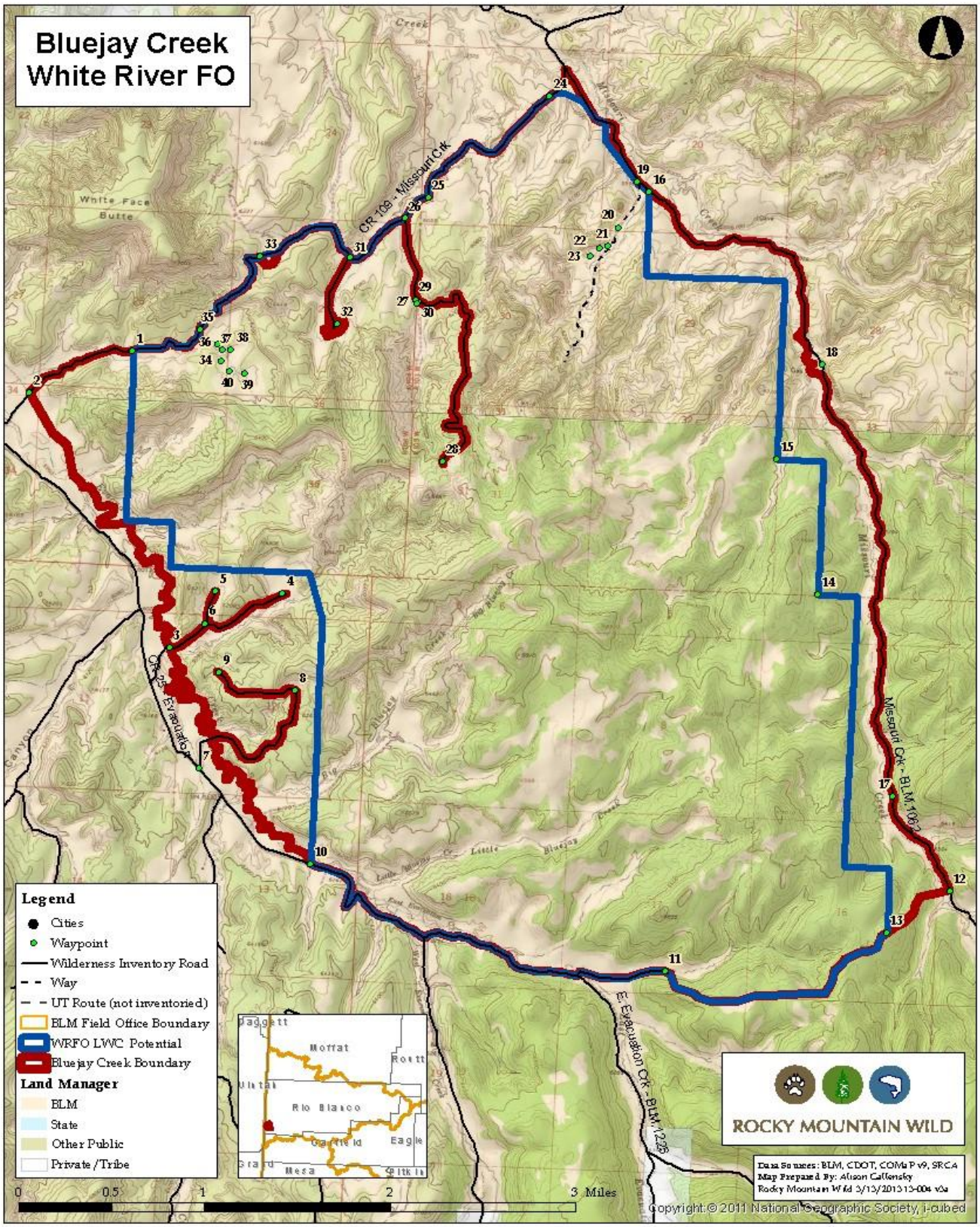
Rat Hole Ridge (4) - WNW

Rat Hole Ridge (5) - NW

Lands with Wilderness Characteristics Recommendations: Bluejay Creek

Bluejay Creek Unit, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Bluejay Creek
White River FO
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
UT Route (not inventoried)
ELM Field Office Boundary
WRFO LWC Potential
Bluejay Creek Boundary
Land Manager
BLM
State
Other Public
Private / Tribe
CR 109 - Missouri Crk
CR 25 - Evacuation
Missouri Crk - BLM 1062
E. Evacuation Crk - BLM 1225
White Face Butte
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
0
0.5
1
2
3 Miles
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 3/13/2013 13-004 v3a
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Overview and Boundary Delineation:

The Bluejay Creek proposed Lands with Wilderness Characteristics (LWC) unit is located in the remote southwest corner of Rio Blanco County just one mile from the Utah border. The 9,900-acre unit acts as a divider between Missouri Creek and Evacuation Creek—an area that is recognized for its outstanding cultural resources including petroglyphs, pictographs, campsites, quarries, and other remnants of both the Fremont and Ute cultures that once occupied the area.

The unit itself is a beautiful collection of small drainages and bottomlands hidden by pinyon-covered buttes and sandstone-capped mesas. In the northern reaches of the unit, the multicolored soils have formed into painted hills while erosional forces have left freestanding spires and pinnacles. The Bluejay Creek unit lies in the shadows of White Face Butte, the most prominent natural feature in the area. Bluejay Creek is one of several adjacent units of wilderness quality lands—including Texas Mountain proposed LWC and Oil Spring Mountain Wilderness Study Area.

The boundaries of the unit are formed by the Baxter Pass Rd (CR 25) on the west, the Missouri Creek Rd (CR 109) in the north, BLM 1062 in the east, and on the south by East Evacuation Creek Rd (BLM 1225). A small portion of the southern boundary is delineated by a pipeline corridor running between Missouri Creek and East Evacuation Creek.

Bluejay Creek was identified by BLM's White River Field Office as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In the report, the BLM identified an area of 8,400 acres around Bluejay Creek (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in the LWC inventory report contain several inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During September of 2012, The Wilderness Society visited the Bluejay Creek area to conduct an in-depth, on-the-ground field inventory of the Bluejay Creek LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this particular case, TWS identified several adjustments that should be made to the BLM's proposed Bluejay Creek LWC boundary in order to bring it in line with the policies laid out in Manual 6310. Once these adjustments are made, a more complete picture of the area's outstanding wilderness character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Bluejay Creek proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Bluejay Creek unit comprises a block of 9,900 acres of contiguous roadless acres. 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 Texas Mountain 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 Bluejay Creek.

Beginning in the northwest corner of the unit, TWS has found several instances where the BLM's desktop inventory boundaries do not match up to realities on the ground and must be altered to comply with Manual 6310. At Waypoint 1, the BLM draws a boundary south and then east through several right angles to Waypoint 10. As seen in these photos, there exists no detectable feature at these points to indicate why BLM chose to put the boundary here, nor does there appear to be private land or other type of land ownership change here that would justify such linear boundaries. The boundary should instead be moved west to the pipeline corridor paralleling Evacuation Creek at Waypoint 2 while cherrystemming the maintained roads beginning at Waypoints 3 and 7 which lead to shut-in and producing oil and gas wells.

Similarly, the eastern boundary of the unit is also made up of seemingly random right angles that do not conform to existing on-the-ground features or land ownership changes; this boundary is marked by Waypoints 13 – 16. Waypoint 16 shows a view looking south directly along the BLM's proposed boundary; this line cuts directly across a large sagebrush filed and up a steep, rocky slope—no road exists at all. This boundary should be moved east to BLM 1062, cutting out the minor oil and gas facilities associated with the producing well at Waypoint 18; the remaining four wells along BLM 1062 are dry and abandoned and do not individually or collectively detract from the overall wilderness characteristics of the area as they are largely invisible to the casual visitor and should be left within the unit (e.g. Waypoint 17).

Based on an analysis of existing oil and gas leases in this area, it seems that BLM may have chosen to draw both the eastern and western boundaries of the Bluejay Creek unit to match up with existing oil and gas leases. BLM guidance is very clear that BLM should not consider existing leases when determining whether an area has wilderness characteristics, stating: "Undeveloped ROWs and similar undeveloped possessory interests (e.g., mineral leases) are not treated as impacts to wilderness characteristics because these rights may never be developed" (Manual 6310, p. 10).

The BLM chose to draw the northern boundary for the unit along CR 109 – Missouri Creek Road. This boundary is largely correct; however, there are four ways intruding into the potential LWC unit along this boundary that need further investigation. Our field inventory determined that two of the ways meet the criteria for Wilderness Inventory Roads and thus should be cherrystemmed into the unit. The first of this begins at Waypoint 26 and leads to an active, but shut-in

well at Waypoint 28. This road is obviously bladed and seems to have been maintained to ensure access to the well pad at Waypoint 28. A short spur road departs south at Waypoint 29; however, this route is no longer passable to any vehicles (Waypoint 30) and is not being maintained. The well that this route once likely provided access to was completed in 1953 and has long since been plugged and abandoned.

The second route that we are cherrystemming into the unit begins at Waypoint 31 and heads southwest to a producing well at Waypoint 32.

Two additional routes along the northern boundary were inventoried and found not to qualify as WIRs and thus were left within the unit. At Waypoint 19 the signed BLM route 1223 departs BLM 1062 and heads southwest into the unit. This route is labeled "One Mile Trail" on the BLM road layer. Although signed as open and with apparent original construction in the form of blading (Waypoint 19), this route quickly dissolves into impassability as seen in Waypoint 21 where a singletrack cattle trail is the only remaining sign of regular use. The purpose of this route may once have been access to a shallow cattle pond; however, this pond is completely overgrown and shows no signs of regular access by motorized vehicles (Waypoint 23). The second route that we've chosen not to cherrystem into the unit begins at Waypoint 35 and also heads south towards a series of water impoundments in various stages of disrepair. Waypoint 35 shows the condition of this route at its intersection with CR 109—the route here is a two-track with vegetation growing in the median. Just a tenth of a mile further south, this route reaches a narrow choke-point, becomes impassable to most vehicles, and shows no signs of regular or continuous use (Waypoint 36). This route has been out of use for some time, as large sagebrush and other shrubs are growing in the route (Waypoint 37). One ATV track was found here; however, the vehicle turned around immediately after the washout and overgrown sections past Waypoint 37. There are several water impoundments south of this point. These ponds vary in functionality, yet all of them are heavily overgrown and have a natural appearance because of apparent naturally-caused reclamation that is occurring (Waypoints 38, 39, 40, and 41). In addition, none of them have any regularly maintained or used road providing access. This route does not qualify as a WIR and thus has been left in the unit without a cherrystem.

After making the boundary changes discussed above, the acreage for the Bluejay Creek unit increases from the original 8,400 acres found by the BLM's desktop inventory to a more accurate 9,900 acres.

II. Bluejay Creek LWC is primarily affected by the forces of nature.

Access to the Bluejay Creek unit occurs primarily via the rough and unpaved Baxter Pass road; because of this difficulty of access, the area currently sees little recreational use. The human impacts present in the area are primarily associated with nearby oil and gas activity and some limited grazing. According to our analysis, only four actively producing oil and gas well pads exist along the periphery of the unit—two along the western boundary near Evacuation Creek—and these pads do not have significant effects on the overall naturalness of the unit as they are only visible when one is within their immediate vicinity. Several older grazing improvements—primarily earthen water impoundments—are found in the northern drainages. As described above and seen in the attached photographs, the majority of these impoundments are apparently out of use and are largely natural in appearance. In no way do they detract from the naturalness of the unit at all, particularly because they lie at the bottom of narrow drainages and are not visible until standing on their very banks. Bluejay Creek's size and proximity to nearby potential LWC units (including Whiskey Creek and Evacuation

Ridge), along with its location adjacent to the Oil Spring Mountain Wilderness Study Area, give the entire unit an outstanding character of naturalness.

III. Bluejay Creek LWC provides outstanding opportunities for solitude and primitive recreation.

As mentioned above, the Bluejay Creek unit is located in an isolated and infrequently visited area of Colorado. It is surrounded on three sides by lands that are either currently being managed for their wilderness characteristics or that have been identified by BLM as potential LWCs. These characteristics, combined with the rugged topography of the 9,900-acre unit—including heavily vegetated draws and canyons, large sandstone-sided cliffs, and wildly shaped hoodoos—provide outstanding opportunities for solitude within the unit. During three full days in this area in September 2012, we encountered only one other person, despite the fact that it was also the opening week of big game hunting season. Given that hunting is likely the primary recreational use of this unit it follows that this unit is very rarely visited at other times of the year. Opportunities for primitive and unconfined recreation exist throughout the unit, whether it is horseback riding or backpacking into the longer drainages such as Big Bluejay or Little Bluejay Creeks or hunting the long draws or sagebrush bottomlands for the large elk that inhabit the area. Despite the lack of trails, hiking opportunities are excellent as the compact soils and gentle ridges facilitate hiking and backpacking deep into the unit. Bluejay Creek also provides the visitor the opportunity to experience cultural resources such as wikiup sites and petroglyph panels in a primitive and undeveloped way, unlike nearby facilities at the Canyon Pintado National Historic District. Taken as a whole, this unit provides an exceptional natural and primitive experience for any visitor who chooses to explore it.

VIII. Bluejay Creek LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen* found Bluejay Creek proposed LWC to contain numerous supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. The most outstanding of these is undoubtedly the cultural resources of the area. The existing Resource Management Plan for the White River Field Office lists the Texas-Missouri-Evacuation Creek cultural resource area as having "high potential for cultural resources"; the unit contains petroglyphs, quarries, and other unmarked and primitive cultural sites. The location of these sites is currently not popularly known, and thus the area provides a unique opportunity to experience these cultural treasures in an exciting way without signage, maps, or other interpretive facilities. In addition to the outstanding cultural resources in the area, the unit also overlaps with the high occurrence area for the narrowstem gilia—a rare plant that is currently listed as a BLM sensitive species. Finally, the Bluejay Creek unit is located within the Eastern Bookcliffs Master Leasing Plan (MLP) area which was accepted by the BLM as a MLP in 2011.

Summary Conclusion

Our extensive on-the-ground inventory of the Bluejay Creek unit shows that the BLM was correct in identifying this area as one that could qualify as Lands with Wilderness Characteristics. However, it was readily apparent that the BLM's desktop inventory of the unit did not adequately define the area of contiguous roadless lands and thus any determination as to the area's wilderness character was not based on the entirety of the qualifying area.

The Bluejay Creek unit is a remote area with outstanding unique cultural, wildlife, and ecological resources which would directly benefit from a more active management with the objective of protecting the wilderness characteristics of the area. Our inventory has documented necessary boundary adjustments as well as the wilderness characteristics located in the Bluejay Creek unit. It is imperative that the BLM give this unit a full inventory to document these and any additional outstanding wilderness characteristics before any land management decisions are made that might negatively affect these resources.

This overview provides new information, including maps and photos, documenting that the 9,900 acre Bluejay Creek unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Bluejay Creek Photopoints

The following photographs correspond with the numbered icons on the attached Bluejay Creek unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Bluejay (1) - S

Bluejay (2) - SSE

Bluejay (3) - E

Bluejay (4) - E

Bluejay (5) - NW

Bluejay (6) - NE

Bluejay (7) - NE

Bluejay (8) - N

Bluejay (9) - NW

Bluejay (10) - N

Bluejay (11) - SE

Bluejay (12) - W

Bluejay (16) - S

Bluejay (17) - SW

Bluejay (18) - WSW

Bluejay (19) - S

Bluejay (20) - N

Bluejay (21) - S

Bluejay (22) - S

Bluejay (23) - SE

Bluejay (24) - E

Bluejay (25) - SE

Bluejay (26) - S

Bluejay (27) - E

Bluejay (28) - N

Bluejay (29) - S

Bluejay (30) - S

Bluejay (31) - S

Bluejay (32) - SE

Bluejay (33) - SW

Bluejay (34) - E

Bluejay (35) - SSE

Bluejay (36) - S

Bluejay (37) - S

Bluejay (38) - Ne

Bluejay (39) - NE

Bluejay (40) - W

Bluejay (41) - E

Bluejay (42) - Scenic

Bluejay (43) – Scenic, Naturalness

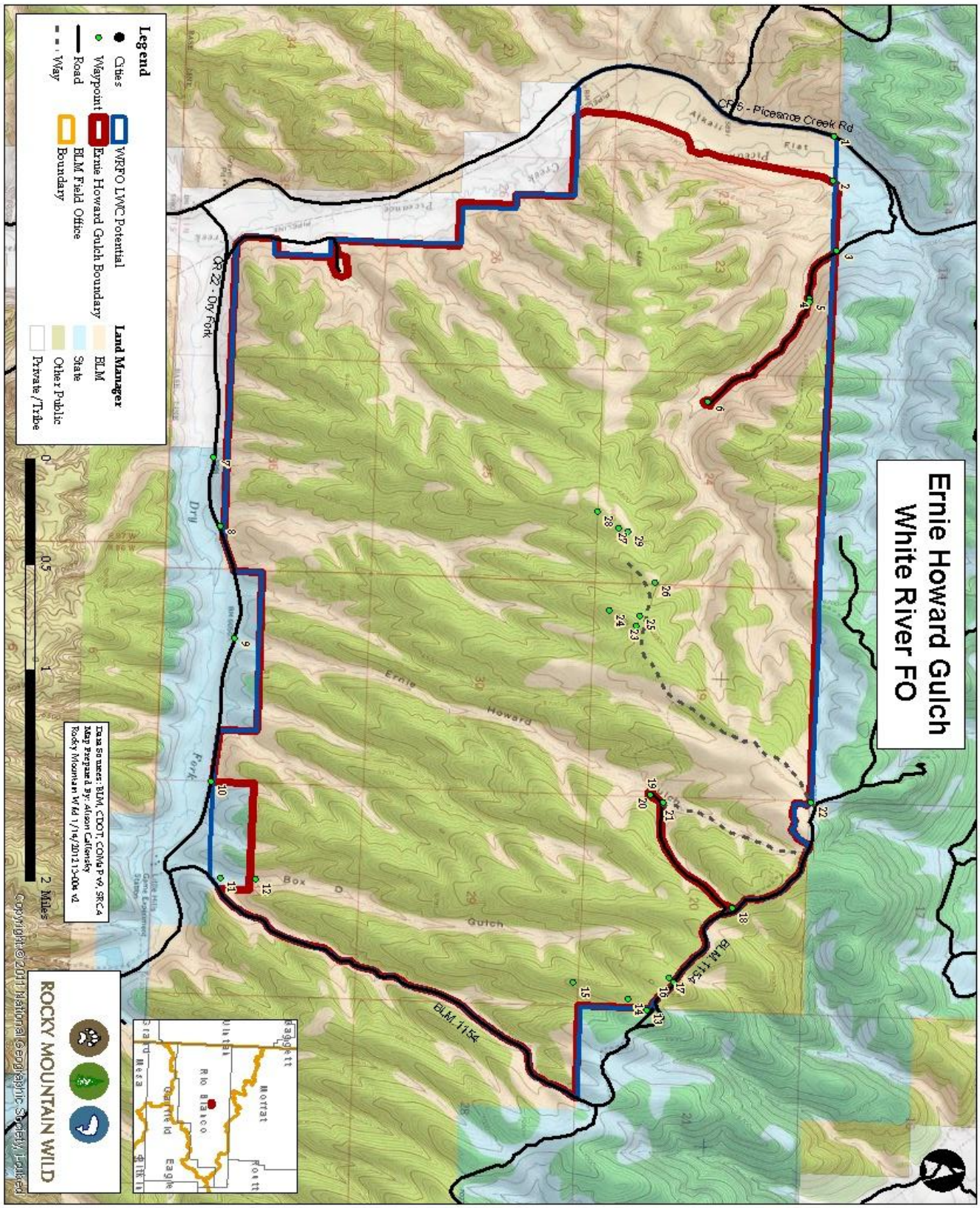
Bluejay (44) – Scenic, Solitude

Bluejay (45) – Scenic, Unconfined Rec

Lands with Wilderness Characteristics Recommendations: Ernie Howard Gulch

Ernie Howard Gulch, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Ernie Howard Gulch
White River FO
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Road
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WRFO LWC Potential
Ernie Howard Gulch Boundary
BLM Field Office
Boundary
Land Manager
BLM
State
Other Public
Private / Tribe
CR 5 - Piceance Creek Rd
CR 22 - Dry Fork
Dry Fork
Ernie Howard Gulch
Box D Gulch
BLM 1154
BLM 1154
0
0.5
1
2 Miles
Data Sources: BLM, CDOT, CoWatch, SRC4
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 1/14/2011
ROCKY MOUNTAIN WILD
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Overview and Boundary Delineation:

Ernie Howard Gulch proposed Lands with Wilderness Characteristics (LWC) unit is a 6,200-acre unit located about 20 miles west of Meeker, Colorado in Rio Blanco County. The unit is made up of a series of southerly draining gulches that divide a long northwest to southeast trending ridge separating the White River and Dry Fork Piceance Creek. On the west lies the main stem of Piceance Creek. The unit's boundaries are defined by private land and a pipeline paralleling Piceance Creek and CR5 on the west, private land and the Colorado Parks and Wildlife's (CPW) Piceance Creek State Wildlife Area (SWA) – Little Hills Unit on the south, BLM 1154 on the east, and CPW's Piceance Creek SWA – North Ridge unit on the north.

Ernie Howard Gulch sits at an elevation of between 5,900 and 7,100 feet, and its convex hills are covered with a shrub and grass community with scattered juniper. There are some existing fire scars on the more exposed ridges, primarily as one approaches the northern portions of the unit. In the lower reaches, mountain and big basin sagebrush dominate.

The unit lies in an important area for wildlife including mule deer, elk, and black bear. Because of its proximity to the White River and Piceance Creek, the area also is home to nesting and forage sites for bald eagle and peregrine falcon.

Presence of humans is generally unnoticeable in the unit. Oil and gas activity is limited to a single shut-in well on the southwestern border of the unit near Piceance Creek and two dry and abandoned wells near Dry Fork Piceance Creek. There are a number of grazing improvements in the unit, including impoundments, stock tanks, and pipelines; however, the cumulative effects of these features does not detract from the overall wilderness qualities of the unit.

Ernie Howard Gulch was identified by BLM's White River Field Office as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In the report, the BLM identified an area of 6,400 acres around Ernie Howard Gulch (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. In 2011, BLM staff conducted an on-the-ground field inventory of these lands that overlapped with areas proposed for oil shale lease allocation in the BLM's Oil Shale and Tar Sands Programmatic Environmental Impact Statement. This BLM inventory concluded that the area does in fact meet the criteria for possessing wilderness characteristics because of its size, naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation.

During May of 2012, prior to the release of the BLM's *Non-WSA Lands with Wilderness Characteristics Inventory Update*, The Wilderness Society visited the Ernie Howard Gulch area to conduct an in-depth, on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

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 found that the BLM's boundaries for the Ernie Howard Gulch unit were largely accurate and met the criteria as laid in Manual 6310. Our inventory did find the presence of three Wilderness Inventory Roads which

we have cut out or cherrystemmed into the unit on the attached map, resulting in a reduction in size of the unit from the BLM's 6,400 acres to a more accurate 6,200 acres. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Ernie Howard Gulch proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Ernie Howard Gulch unit comprises a block of 6,200 contiguous roadless acres. 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 (Wilderness Inventory Road). 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). All photopoints referred to in the narrative below can be seen in the attached photosheet for Ernie Howard Gulch.

The Wilderness Society has found that the BLM's desktop inventory boundary for the Ernie Howard Gulch unit largely mirrors the on-the-ground situation and thus our recommended boundary adjustments for this unit are relatively minor. However, there are two routes leading into the unit that meet the criteria for consideration as WIRs and thus were cherrystemmed into the unit; there is also an active but non-producing well pad that we have cut out from the unit. These changes are described in detail below.

Waypoint 1 was taken looking east over Piceance Creek from the northwest corner of the BLM's desktop inventory boundary of the unit. Piceance Creek has a developed and substantially noticeable pipeline and associated infrastructure paralleling the creek; this pipeline should be the western boundary of the unit (Waypoint 2). Waypoints 3-5 are located on a route which leads to a developed stock tank at Waypoint 6. During our inventory of the area in May, we noticed that this route, although bermed in places, does see regular and continuous use and does seem to be maintained. There is a pump and pipeline which brings water up to the tank from Piceance Creek. This route and tank should be cherrystemmed into the unit.

The shut-in well along the southwestern boundary near the intersection of CR22 and CR5 was inside the BLM's original boundaries for this unit. However, this pad continues to have significant activity and the access road from CR22 appears to be regularly maintained to ensure continuous use. We have cut the pad out of the unit. Waypoints 7, 8, and 9 are at or near the border of BLM and Colorado Parks and Wildlife lands. All three of these waypoints are located on remnant routes that once led up into the Ernie Howard Gulch unit. Waypoint 7 shows a non-existent route that does not appear to have ever been constructed using mechanical means; this route is visible at its intersection with the county road but quickly vanishes into a sagebrush gully. Waypoint 8 is looking north into BLM lands; however, the access to this route is controlled by Colorado Parks and Wildlife as it is located on the Piceance Creek State Wildlife Area. The route is gated and signed as open to authorized vehicles only. Two old oil and gas wells dating from the 1950s are located inside the unit along this route and presumably were the original purpose for its construction. However, these wells are both abandoned and haven't seen any activity for decades. In May of 2012 this route had no visible tread and did not appear to be maintained using mechanical means to ensure any type of regular or continuous use. Waypoint 9 is looking up

Ernie Howard Gulch proper from CR22. This location is on the SWA and the route heading north into the unit here is signed by CPW as open to authorized vehicles only. The route may have once been bladed through the sagebrush, but as of 2012 was overgrown and impassable to passenger vehicles. No evidence of maintenance using mechanical means was present. None of the three routes represented in Waypoints 7, 8, or 9 qualify as roads for wilderness inventory purposes.

At Waypoint 10 the boundary should jog north and then east along the boundaries of the Piceance State Wildlife Area. Waypoints 11 and 12 show a short spur route that leads a very short distance up Box D Gulch. Waypoint 12 clearly shows that this route receives no maintenance of any kind and is not a WIR.

From the northern boundary of the unit, several routes drop south and west off of BLM 1154, which follows the top of the highest ridge. Many of these routes seem to be user-created, with no evidence of original construction using mechanical means. It is possible that they are used during the hunting season; however, signs of use are generally minimal. The route along Waypoints 13, 14, and 15 is representative of these routes. At its intersection with BLM 1154 (Waypoint 13), the route has vegetation growing between the tread, but tracks are visible from recent use. However, the route quickly deteriorates to the point of near invisibility and no tread is visible. The route appears to be maintained solely by the irregular passage of vehicles and does not qualify as a WIR.

At Waypoint 18 a bladed and maintained route heads southwest into the unit. Although this route is overgrown in places, with grasses and shrubs growing in the medium, it appears to receive regular use and evidence of maintenance was visible. The route has a purpose of providing access to two recently installed stock tanks (Waypoint 19). The route seems to have once continued south past these tanks. Now, however, the character of the route changes dramatically beyond them, becoming impassable to passenger vehicles and showing no signs of maintenance. The route should be cherrystemmed into the unit from the north, terminating at the stock tanks. At Waypoint 21 a spur route heads directly north across a deep arroyo and up the bottom of Ernie Howard Gulch. This route shows no sign of construction using mechanical means and appears to be maintained solely by the passage of ATVs. Vegetation is encroaching on the route, causing it to be very narrow in locations. While the route may be used during the hunting season, it is redundant and unnecessary as the route just to the east provides similar access and is in a more passable and maintained condition. The route heading north from Waypoint 21 is not a WIR.

The longest route leading into the Ernie Howard Gulch proposed LWC begins at Waypoint 22. Although the route appears to have been bladed at one point, possibly to provide access for the construction of a stock pond (Waypoint 25), this route now shows no sign of maintenance or improvements using mechanical means and the stock pond itself is overgrown. The route vanishes completely after the old stock tank as seen in Waypoints 26 and 29. Three spur routes cut off of this main route, apparently as ways to access finger ridges above the deeper drainages such as Ernie Howard Gulch. None of these routes show any signs of original construction and all seem to be user-created through the passage of ATVs or 4WD vehicles, possibly during hunting season. The two westernmost of these spur routes are shown in Waypoints 24 and 27—they are neither constructed nor maintained and like the route from which they spur, do not qualify as WIRs.

After incorporating the three cherrystems listed above and shown on the attached map, the Ernie Howard Gulch unit contains 6,200 contiguous roadless acres of BLM lands and thus meets the size criterion as outlined in BLM Manual 6310.

II. Ernie Howard Gulch proposed LWC is primarily affected by the forces of nature.

The Ernie Howard Gulch unit is primarily used for hunting and grazing purposes and shows few significant human impacts. The long ridges and deep southwest draining gulches are affected almost solely by the forces of nature. The limited human impacts within the unit include grazing improvements, primarily in the form of earthen stock ponds or small tanks, and user-created vehicle routes. There also is a small weather station facility near Waypoint 22 along BLM 1154. The stock improvements are very sparse and, except for fairly recently improved stock tanks at Waypoint 23, do not appear to be regularly or recently maintained in any way. Also, because of the topography of deep gulches and tall ridges, the grazing features that do exist are heavily screened so that they are only visible in their immediate vicinity. The weather station is outside the unit and located in such a way that it is substantially unnoticeable from inside the unit. The majority of the vehicle routes are overgrown and revegetating, and do not see regular maintenance as described above. Outside, but on the periphery, of the unit are some minor oil and gas developments; however, no producing oil and gas wells were found near the boundaries of the unit, a rare fact so near to the highly industrialized Piceance Basin. The short segment of the northwestern boundary that parallels CR5 does have some impacts from oil and gas development—including heavy truck traffic along the county road and a pipeline paralleling the creek. However these impacts are isolated to this one portion of the unit and are neither visible nor audible from anywhere else in the unit because of CR5's location below a 500-foot tall ridge separating Piceance Creek from the rest of the unit (see Waypoint 1).

The Ernie Howard Gulch unit is primarily affected by the forces of nature, and contains only minor human impacts. Neither individually nor cumulatively do these impacts affect the area's overall naturalness.

III. Ernie Howard Gulch proposed LWC provides outstanding opportunities for solitude and primitive recreation.

Because the sole access to the bulk of the Ernie Howard Gulch unit is via the rough BLM road 1164, the unit sees limited use, and outstanding opportunities for solitude and primitive recreation are abundant. The unit's long deep gulches and high exposed ridges provide unique opportunities for solitude and recreation. Each of these half dozen or so gulches varies in degrees providing a variety of experiences for the individual traveling these areas. Because the unit is sandwiched between two State Wildlife Area units, the feelings of solitude are enhanced. Opportunities for primitive and unconfined recreation include hunting, hiking, backpacking, horseback riding, photography, and bird-watching. From the highest ridges in the unit, one can see large vistas including the White River and the nearby Black Mountain/Windy Gulch Wilderness Study Area to the north, and the rugged hills above Piceance Creek and the Dry Fork Piceance to the south.

VIII. Ernie Howard Gulch proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen* found Ernie Howard Gulch proposed LWC to contain numerous supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. The area's location near the White River causes it to be prime foraging habitat for bald eagles and other birds utilizing the river corridor. CPW recognizes the area as critical winter range for mule deer and winter concentration area for elk. Finally, the area's location between two State Wildlife Area Units shows that this area has important wildlife and habitat values; allowing them to go unprotected could impair the values of these State Wildlife Area units. Protecting the wilderness characteristics and roadless nature of this unit will help preserve these significant wildlife values and ensure that hunting and other types of outdoor recreation continues in this area for years to come.

Summary Conclusion

Our extensive on-the-ground inventory of the Ernie Howard Gulch proposed LWC shows that the BLM was correct in determining in its 2012 *Non-WSA Lands with Wilderness Characteristics Inventory Update* that the Ernie Howard Gulch unit does in fact have wilderness character (p. 8). The area's 6,200 roadless acres provide outstanding opportunities for solitude and primitive and unconfined recreation and have outstanding supplemental characteristics—including important wildlife habitat—whose protection would enhance the wilderness character of the area. Now that BLM has recognized this area's wilderness character, it should ensure that this character is protected.

This report provides new information, including maps and photos, documenting that the 6,200-acre Ernie Howard Gulch unit meets BLM's LWC criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Ernie Howard Gulch Photopoints

The following photographs correspond with the numbered icons on the attached Ernie Howard Gulch map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

EHG (1) - ESE

EHG (3) - SSE

EHG (4) - E

EHG (5) - E

EHG (7) - N

EHG (8) - N

EHG (9) - N

EHG (11) - N

EHG (12) - N

EHG (13) - S

EHG (14) - SSE

EHG (15) - S

EHG (16) - S

EHG (17) - S

EHG (18) - SSW

EHG (19) - SW

EHG (20) - S

EHG (21) - N

EHG (22) - S

EHG (23) - W

EHG (24) - S

EHG (25) - S

EHG (26) - SW

EHG (27) - S

EHG (28) - SE

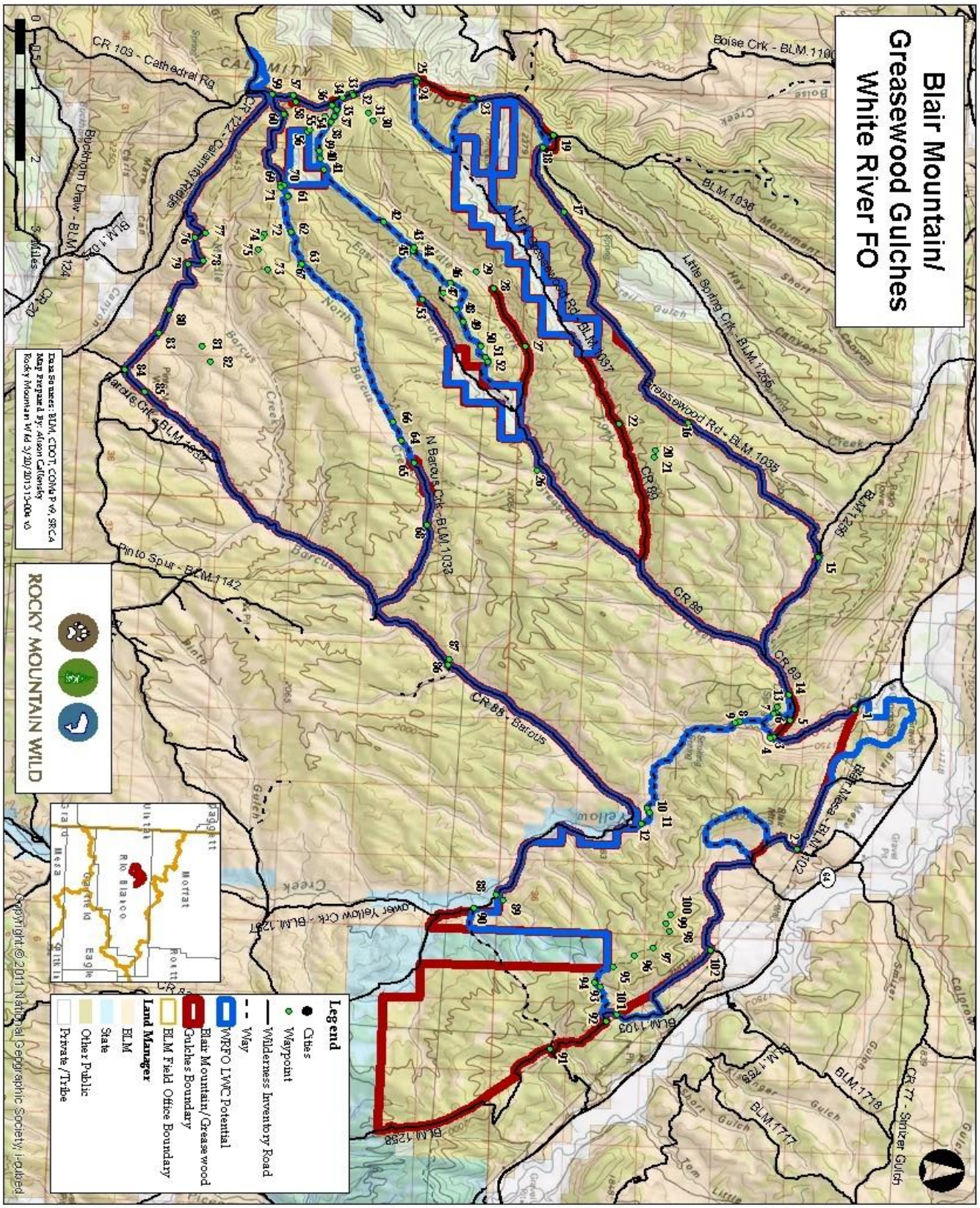
EHG (29) - W

EHG (Wild)

Lands with Wilderness Characteristics Recommendations: Blair Mountain/Greasewood Gulch

Greasewood Gulches, White River Field Office *Photo: Todd Patrick*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Blair Mountain/
Greasewood Gulches
White River FO
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Blair Mountain/Greasewood Gulches Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
ROCKY MOUNTAIN WILD
Boise Crk - BLM 1100
CR 103 - Cathedral Rd
CR 122 - Calamity Ridge
Buckhorn Draw - BLM 1240
CR 20
Greasewood Rd - BLM 1037
Little Spring Crk - BLM 1295
BLM 1036
CR 89
BLM 1258
Barcus Crk - BLM 1032
N Barcus Crk - BLM 1033
Pinto Spur - BLM 1142
CR 88 - Barcus
Lower Yellow Crk - BLM 1281
Blair Mesa - BLM 1102
BLM 1103
BLM 1758
BLM 1718
BLM 1717
CR 77 - Stritzler Gulch
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Overview and Boundary Delineation:

The proposed Blair Mountain/Greasewood Gulches Lands with Wilderness Characteristics unit (LWC) contains approximately 40,300 acres of multiple long, wide draws; sinuous ridges dotted with scattered juniper; and lush riparian habitats along a perennial creek. The unit is made up of numerous lengthy gulches or draws that drop gently off of Calamity Ridge and trend northeast towards Yellow Creek and Blair Mountain. At the highest elevations, serviceberry, mountain mohagany and Wyoming sagebrush are found, while lower down, pinyon-juniper woodlands and sagebrush steppes dominate the landscape. Along Yellow Creek, a healthy riparian corridor exists along the alkaline waters and wetlands.

The unit is home to an unusually high diversity of rare plants and vegetation types, and the BLM has recognized this fact by designating three Areas of Critical Environmental Concern (ACECs) within the unit—Lower Greasewood, Upper Greasewood, and Yanks Gulch. These ACECs were designated by the BLM in order to protect the threatened and endangered plants, sensitive plant species, and remnant vegetative associations which are found within the Blair Mountain/Greasewood Gulches unit.

With over 40,000 acres, the Blair Mountain/Greasewood Gulches area has outstanding opportunities for solitude and primitive recreation. Solitude is easily found at the upper ends of one of the shallow draws such as Middle Barcus Creek or the Middle Fork Greasewood Creek. Solitude can also be found along the flanks of Blair Mountain or deep in the reeds and wetlands along Yellow Creek. Primitive recreational opportunities include the long, wild hiking opportunities along the ridges above Greasewood or Barcus Creeks; the excellent camping opportunities available atop Calamity Ridge; and the outstanding mule deer hunting opportunities present during the fall hunting season. Wildlife viewing—particularly of the abundant wild horse herds in the area—is also popular.

The Blair Mountain/Greasewood Gulches proposed LWC unit is located south of Colorado State Highway 64, between the towns of Rangely and Meeker, Colorado. The unit sits at elevations between 5,600' and 8,200' in elevation and lies entirely within Rio Blanco County. The unit is bordered on the west by BLM 1036; on the south and east by Rio Blanco County Road 122, BLM 1032, Rio Blanco County Road 88, and the Piceance State Wildlife Area; and on the north by BLM 1103, BLM 1102, and a large power line corridor paralleling Colorado State Highway 64.

In its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012 (Inventory Update), the BLM's White River Field Office (WRFO) identified four separate units around Greasewood Creek, Barcus Creek, and Blair Mountain (delineated by the blue line on the attached map) that had the potential to qualify as LWC units. During the summer of 2011, the BLM conducted full field inventories of two of these units—"Polygon 9 – Barcus Creek Area" and "Polygon 12 – Greasewood Creek Area" and found that both areas meet the criteria for Lands with Wilderness Characteristics laid out in BLM's Manual 6310. The other two potential LWC units that make up the proposed Blair Mountain/Greasewood Gulches unit have yet to be inventoried by the BLM.

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). While we certainly agree with the BLM's conclusions that both the Barcus Creek and Greasewood Creek units contain wilderness characteristics, the BLM's field inventories for these units failed to accurately assess the boundaries themselves, to see whether or not the boundaries produced by the BLM's desktop

inventory were indeed based on the definitions of Wilderness Inventory Roads and other qualifying features for boundary delineation as laid out in BLM's own policies. In addition, the BLM's boundaries for the two non-inventoried units (Blair Mountain and Middle Fork Greasewood Creek) were not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer that doesn't differentiate between those roads that qualify for Wilderness Inventory Roads under BLM Manual 6310 and those that do not. Therefore, the boundaries proposed by the BLM in the LWC inventory report contain several inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

On four different occasions during the summer of 2012, The Wilderness Society visited the Blair Mountain/Greasewood Gulches area to conduct an in-depth, on-the-ground field inventory of the BLM's potential LWC units in the area. Our goal was to assess whether the BLM's boundaries for the units that were inventoried in 2011 needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310, as well as to assess whether the desktop inventory boundaries for the units where the BLM has yet to conduct full field inventories needed to be adjusted for the same reasons. A secondary goal was to gather data on the wilderness characteristics of the units after the necessary boundary adjustments were made.

In this particular case, TWS found that the BLM's boundaries for the LWC units in the area contained several inaccuracies and were not always based on Wilderness Inventory Roads or other qualifying boundary features. Our inventory found that four of these units (BLM LWC Polygons 9, 12, 13, and 14) were in fact not separated by WIRs or other features and thus these units should be considered as a single LWC unit (heretofore the Blair Mountain/Greasewood Gulches unit). Our inventory also identified several WIRs in the area that the BLM failed to recognize. These boundary adjustments and WIR determinations are detailed below (and in the attached photosheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Blair Mountain/Greasewood Gulches proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Blair Mountain/Greasewood Gulches unit comprises a block of 40,300 contiguous roadless acres. 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). Our inventory of the area revealed that in several cases the BLM's proposed boundaries for this unit do not meet the above criteria for WIRs and as such need to be modified; our proposed modifications are detailed below. All Waypoints referred to in the narrative can be seen in the attached photo sheet for Blair Mountain/Greasewood Gulches.

A large powerline corridor runs along the north side of Blair Mountain (Waypoint 1). This feature meets the criteria for a LWC boundary as it is a substantially noticeable structure and a developed right-of-way. The BLM's boundary should

follow the south side of this powerline corridor between Waypoints 1 and 2 and Waypoints 101 and 102 so that the powerline is cut out of the LWC unit entirely.

At Waypoint 3, the BLM's desktop inventory produced a boundary line which follows Yellow Creek along the south side of Blair Mountain. While there may have once been a route along Yellow Creek, the route is no entirely overgrown and is nearly impossible to follow, even by foot (Waypoint 3). The photo associated with Waypoint 4 was taken looking directly up the proposed boundary for Blair Mountain; there is no road here or any other distinguishing feature. Further down this boundary line a narrow, rutted, and rough route can be found (Waypoint 8). This unmaintained route only exists for a short distance before disappearing where it meets Yellow Creek (Waypoint 9). From here the route is completely impassable to vehicles as it proceeds south towards Stinking Spring. Beyond Stinking Spring, near where the boundary line meets CR 88, the former route appears again, but at this point it is merely a narrow path formed by the passage of cattle and/or big game (Waypoint 10). At Waypoint 11, a two-track again appears, however it is clearly unmaintained with large sagebrush growing directly in the track. This boundary—roughly between Waypoints 4 and 12—is unmaintained, see no vehicular use, and is entirely invisible for long segments. The route does not meet the criteria for a WIR according to BLM's own policies and should be deleted, resulting in the joining of BLM's proposed LWC polygons 14 (Blair Mountain) and 12 (Greasewood Creek Area).

At Waypoint 23, along the top of Calamity ridge above Thompson Springs, the BLM's desktop inventory produced a boundary along the route labeled BLM 1037 on the White River Field Office's GIS road layer for this area. This route is unmaintained and leads to a dead-end at the private property at the bottom of the draw formed by the North Fork Greasewood Creek. This short boundary segment should be deleted as it is unmaintained to ensure regular and continuous use and has no purpose; the private property is easily accessed via the graded and maintained CR 89 at the east end of North Fork Greasewood Creek (Waypoint 22). Similarly, the boundary line at Waypoint 25 drops into the North Fork Greasewood Creek along a route that shows no signs of construction or regular maintenance; the route is impassable to vehicles of any sort and should be deleted as well (Waypoint 24).

Along the ridge separating the North and Middle Forks of Greasewood Creek, a very overgrown and apparently out-of-use route follows the ridge down and into the Middle Fork of Greasewood Creek. This route does not appear on the White River Field Office's GIS road layer. The route is clearly unmaintained at its junction with BLM 1036 atop Calamity Ridge (Waypoint 33). After only a short distance the route becomes exceedingly narrow and overgrown (Waypoint 32). Once it reaches the bottom of the draw, the route disappears entirely in the tall grasses and shrubs (Waypoints 31, 30). This route does not qualify as a WIR .

At Waypoint 34, the route labeled BLM 1136 heads east and south along Middle Greasewood Ridge. This route appears to have been constructed as a firebreak and it is straight, narrow, and directly on the top of the ridge. However, this route has deteriorated significantly since construction, with large bushes and shrubs encroaching on the narrow route (Waypoint 38, 41). The route shows little sign of regular use (Waypoint 39, 40). Further down, the route approaches a parcel of private property at the junctions of the East Fork and Middle Forks of Greasewood Creek. The route's condition continues to deteriorate, with bigger ruts (Waypoint 47), narrower passageways (Waypoint 49) and fallen timber across the roadbed (Waypoint 51). As the route approaches the private property boundary, the route becomes very steep and loose (Waypoint 52). Because BLM 1136 appears to be unmaintained, little used, and offers no outlet because of the private property line at its eastern end, the route does not qualify as a WIR for LWC boundary delineation

purposes and should be deleted, resulting in the conjoining of the southwest portions of BLM's desktop inventory polygons 12 and 13.

On the eastern end of the private property parcel at the junction of Middle Fork and East Fork Greasewood Creek, the boundary meets and follows BLM 1135. BLM 1135 is clearly maintained from CR 89 to the private property line. Beyond the private property, where BLM 1135 travels north and west up the Middle Fork Greasewood Creek, the route appears to receive some maintenance as it is cleared through the dense sagebrush thickets (Waypoint 27) to the windmill-powered pump at Waypoint 28. Beyond Waypoint 28, the route deteriorates, is not maintained, and receives little to no use (Waypoint 29). BLM 1135 should be cherrystemmed out of the unit from its inception at CR 89 to the water pump at Waypoint 28.

The western end of the boundary between BLM's LWC polygons 9 and 12 also seems to be based on a route that does not qualify as a Wilderness Inventory Road. Between Waypoints 65 and 61, the BLM's boundary dividing these two polygons follows BLM 1033. East of Waypoint 65 and to its junction with CR 88, BLM 1033 is an easy to follow route that shows some signs of maintenance. The route gets regular use, probably by vehicles accessing the oil and gas infrastructure at and near Waypoint 65. However, beyond the oil and gas wellhead at Waypoint 65, the route becomes considerably rougher and shows no signs of maintenance using mechanical means to ensure regular and continuous use. Just west of the wellhead at Waypoint 65, BLM 1033 is a two-track route that is passable to high-clearance vehicles. The route at this point does not appear to be maintained, however, as trenches exist in the roadbed and large grasses and shrubs are growing in the median. Further west, the condition of the route becomes decidedly worse, and the route increasingly hard to follow. At Waypoint 63,, the route is nearly indistinguishable from the surrounding terrain, and at Waypoint 62, deep ruts and large clumps of grasses and shrubs makes passage by even high-clearance 4WD vehicles difficult. Just east of Waypoint 61, the route travels up a very steep slope composed of deep, loose sand. If this route were maintained using mechanical means, this segment of the route would likely contain a switchback to lessen the exceedingly steep gradient of the route. However, the route travels directly up the slope, indicating a lack of maintenance. Once on top of the ridge, the route reaches a wide open overlook spot that is accessed from Calamity Ridge to the west (Waypoints 59, 60). This boundary line, between the overlook and primitive campsite at Waypoint 71 and the oil and gas wellhead at Waypoint 65, does not follow a WIR; the route is clearly not maintained to ensure regular and continuous use. This boundary segment should be deleted, leaving two shorter cherrystems at either end of the route and resulting in the conjoining of BLM's LWC polygons 9 and 12.

At the southeast corner of the unit, near the Piceance State Wildlife Area properties along Yellow Creek, the BLM's GIS road layer for this area shows two routes traveling into the Blair Mountain portion of the unit from CR 88. At Waypoint 88, the first of these routes can be seen. This route begins as a rough two track through high sagebrush and quickly becomes a nearly impassable path along the deep sands and loose soils of the arroyo bottom. The route is not maintained and is not a WIR. Just to the south, a route appears on the BLM road maps labeled BLM 1257. However, we were unable to find any evidence of this route's existence on this end of its length (Waypoint 90). Waypoint 90 was taken directly on top of the BLM's boundary line for this unit and no road or other qualifying boundary feature is locatable here.

The southeastern boundary for BLM' s desktop inventory unit "Polygon 14 – Blair Mountain" began at Waypoint 90 and traveled north and then east along the boundary of the Colorado State Wildlife Area to an intersection with an unnamed

BLM route at Waypoint 95. This unnamed BLM route begins at BLM 1103, which, along with BLM 1102, runs between the northern flanks of Blair Mountain and Hwy 64. As the route begins at BLM 1103 and heads west and north, its unmaintained character is immediate clear. At Waypoint 93, the route is constructed, but is no longer being maintained; large grasses are present in the road bed and the loose sandy bed surface exhibited only a single set of OHV tracks. The route appears to be little used. At Waypoint 94 the route's character worsens significantly. In this section fully grown grasses and large bushes are growing in the roadbed (Waypoint 94) covering the entire width of the route from side to side, indicating that this route has not seen maintenance in some time. As the route approaches the summit ridge of Blair Mountain, the road bed is distinguishable again, however its unmaintained nature continues. At Waypoint 95, the route is rutted and covered in small grasses. At Waypoints 96 and 97, dead timber has fallen across the route and has not been cleared or removed, although some users have apparently managed to drive around these obstacles, creating new user-created route segments in places. As the route approaches the highest elevations of Blair Mountain, it becomes increasingly difficult to follow and deteriorated in condition (Waypoint 99). The route dead-ends and disappears entirely just west of Waypoint 100. This unnamed BLM route, from Waypoint 92 to Waypoint 100, is an unmaintained route which sees little use beyond the occasional OHV. This route does not qualify as a WIR and as such the BLM's boundary for this part of the unit should be deleted and moved south to incorporate all the contiguous roadless BLM lands between the Piceance State Wildlife Area and the BLM roads 1103 and 1258.

After incorporating the numerous changes proposed above and shown on the attached map, the Blair Mountain/Greasewood Gulches unit contains 40,300 contiguous roadless acres of BLM lands and thus meets the size criterion as outlined in BLM Manual 6310.

II. Blair Mountain/Greasewood Gulches proposed LWC is primarily affected by the forces of nature.

The topography of the Blair Mountain/Greasewood Gulches proposed LWC unit is a series of gulches or draws draining to the northeast off of Calamity Ridge, which are in turn joined by numerous, smaller drainages coming off of the separating ridges between each prominent draw. These draws drain into Yellow Creek, which flows along the southwest flank of Blair Mountain. The unit has a very wide variety of habitats and topographies. Fire activity is common in the unit. Large burn scars in varying degrees of rehabilitation can be found throughout the unit, but concentrate around the lower reaches of Greasewood and Barcus Creeks. These fires have contributed to the recovery and reclamation of several old vehicle or seismic routes in these lower reaches of the unit, as the routes are now covered by grasses or fallen and burnt timbers. In the mid to higher elevations of the unit, pinyon and juniper dominate the vegetation.

Human impacts in the upper elevations consist of antiquated vehicle routes. These routes are largely associated with former seismic activity or, possibly, the construction of fire breaks. Because of the ridge and valley type topography of the unit, as well as the dense stands of pinyon and juniper, these routes are generally not visible until standing in their roadbeds.

Oil and gas activity is virtually non-existent in the Blair Mountain/Greasewood Gulches unit. One producing, and several non-producing, oil and gas wells are located in a small and concentrated area along the bottom of North Barcus Creek near its intersection with CR 88. The rest of the unit is devoid of oil and gas activity, which is relatively rare for an area of this size in the region. This lack of oil and gas development is the primary reason this unit retains its apparent naturalness.

The BLM's White River Field Office found apparent naturalness in both of the potential LWC polygons that they inventoried within this proposed Blair Mountain/Greasewood Gulches LWC unit. In its *Non-WSA Lands with Wilderness Characteristics Inventory Update* and associated road determination forms completed during the inventory for "Polygon 9 – Barcus Creek Area", the BLM found that "only two of the routes [within the unit] showed regular and continuous use" and that none of these routes met the criteria for a Wilderness Inventory Road. The BLM added, "The routes and other human improvements are difficult to see until within 30 feet. This gives an apparent naturalness to the average visitor within the area." Similarly, for "Polygon 12 – Greasewood Creek Area", the BLM found that none of the routes inventoried met the criteria for Wilderness Inventory Roads, and that the conditions of these routes, the screening provided by the topography and vegetation, and the lack of other development all contributed to the apparent naturalness present in the unit.

The Blair Mountain/Greasewood Gulches unit as a whole is primarily affected by the forces of nature and appears natural to the casual visitor.

III. Blair Mountain/Greasewood Gulches proposed LWC provides outstanding opportunities for solitude and primitive recreation.

The Blair Mountain/Greasewood Gulches unit is over 40,000 acres in size, making it one of the largest blocks of wilderness-quality BLM lands left in all of northwest Colorado. Opportunities for solitude exist throughout this large unit. The forks of Barcus and Greasewood Creeks, particularly near their heads below Calamity Ridge, offer quiet, enclosed valleys that offer outstanding solitude. A short walk or horseback ride to the wide ridges between lower Greasewood Creek and lower Barcus Creek provides outstanding views and the high likelihood that another person will not be encountered. Blair Mountain's numerous small drainages and steeply sloped hillsides provide outstanding opportunities to find solitude and to enjoy the unique views up the finger ridges and wide basins of Greasewood Creek.

The BLM noted in their *Non-WSA Lands with Wilderness Characteristics Update* that both of the potential LWC units that they inventoried within our proposed Blair Mountain/Greasewood Gulches LWC contained outstanding opportunities for solitude because of the "topography, vegetation, and size" of the units. These same topographies and vegetations are present throughout the unit, and the size of our combined Blair Mountian/Greasewood Gulches unit is considerably larger than the area so far inventoried by the BLM in this area. Outstanding opportunities for solitude abound in this unique and extensive unit. The BLM also found that the units inventoried in this area had "outstanding primitive recreational opportunities like hunting, hiking, horseback riding, snowshoeing, cross country skiing, and wildlife viewing." These primitive recreational opportunities are found throughout the 40,300 acre Blair Mountain/Greasewood Gulches LWC unit.

VIII. Blair Mountain/Greasewood Gulches proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found Blair Mountain/Greasewood Gulches proposed LWC unit to contain several supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. Three Areas of Critical Environmental Concern are found within this unit. These areas were designated by the BLM to protect threatened and endangered plants, sensitive plant species, and remnant vegetative associations. The

rare and/or sensitive plants that can be found within the unit include the Narrow-stem gilia, the Piceance twinpod, and the Piceance bladderpod.

In addition to the rare plants found scattered throughout the unit, the area is prized for its wildlife habitats and prolific big game species. Hunting is probably the number one use of the area for these reasons. Mule deer migration corridors traverse the unit along Calamity Ridge, and severe winter range for these animals is located along the lowlands of Yellow Creek. Elk production areas and summer range exists at the higher elevations of the unit as well. Bald and golden eagles can be spotted in the unit and Colorado Parks and Wildlife has identified Preliminary General Habitat for the greater sage-grouse in portion of the unit. Much of the unit is utilized by the prolific wild horse herds of the area. Finally, this unit lies entirely within the Dinosaur Lowlands Master Leasing Plan area (MLP) that the BLM accepted as an MLP in 2011.

Summary Conclusion

Our extensive on-the-ground inventory of the Blair Mountain/Greasewood Gulches unit shows that the BLM was correct in identifying this area as one that could qualify as Lands with Wilderness Characteristics. We agree with the BLM's conclusion that two portions of this unit along Greasewood Creek and Barcus Creek have wilderness characteristics and meet the criteria for LWCs laid out in BLM Manual 6310. However, our inventory found several deficiencies in the BLM's inventory, primarily relating to the failure to conduct Wilderness Inventory Road determinations for the boundaries produced by the BLM's desktop inventory for these units. Our inventory has shown that several of the BLM's proposed boundaries do not meet the definition of Wilderness Inventory Roads. After corrections are made to these boundaries, the four desktop inventory units that the BLM proposed in this area can be combined into a single unit of 40,300 acres. This unit—the Blair Mountain/Greasewood Gulches LWC—meets all the criteria for Lands with Wilderness Characteristics. The boundaries created through the BLM's desktop inventory of potential LWCs is largely correct for this unit. It is imperative that the BLM complete full field inventories of the remaining, noninventoried units that make up this proposal before any land management decisions are made that might degrade these unique qualities

This overview provides new information, including maps and photos, documenting that the 40,300-acre Blair Mountain/Greasewood Gulches unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Blair Mountain/Greasewood Gulch Photopoints

The following photographs correspond with the numbered icons on the attached Blair Mountain/Greasewood Gulch unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Blair/Greasewood (1) - ESE

Blair/Greasewood (3) - S

Blair/Greasewood (4) - WSW

Blair/Greasewood (5) - SW

Blair/Greasewood (6) - SE

Blair/Greasewood (7) - S

Blair/Greasewood (8) - S

Blair/Greasewood (9) - S

Blair/Greasewood (10) - W

Blair/Greasewood (11) - E

Blair/Greasewood (12) - S

Blair/Greasewood (13) - E

Blair/Greasewood (15) - WSW

Blair/Greasewood (16) - SSW

Blair/Greasewood (17) - E

Blair/Greasewood (20) - E

Blair/Greasewood (21) - SSW

Blair/Greasewood (22) - WSW

Blair/Greasewood (23) - NE

Blair/Greasewood (24) - SE

Blair/Greasewood (25) - W

Blair/Greasewood (26) - S

Blair/Greasewood (27) - WSW

Blair/Greasewood (28) - W

Blair/Greasewood (29) - SW

Blair/Greasewood (30) - E

Blair/Greasewood (31) - NE

Blair/Greasewood (32) - NNE

Blair/Greasewood (33) - NW

Blair/Greasewood (34) - SE

Blair/Greasewood (35) - SW

Blair/Greasewood (36) - SW

Blair/Greasewood (37) - SE

Blair/Greasewood (38) - E

Blair/Greasewood (39) - W

Blair/Greasewood (40) - W

Blair/Greasewood (41) - E

Blair/Greasewood (42) - SE

Blair/Greasewood (44) - S

Blair/Greasewood (45) - NW

Blair/Greasewood (46) - N

Blair/Greasewood (47) - N

Blair/Greasewood (48) - WNW

Blair/Greasewood (49) - WSW

Blair/Greasewood (50) - E

Blair/Greasewood (51) - NE

Blair/Greasewood (52) - E

Blair/Greasewood (54) - NW

Blair/Greasewood (55) - NE

Blair/Greasewood (56) - NW

Blair/Greasewood (57) - NE

Blair/Greasewood (58) - NW

Blair/Greasewood (59) - E

Blair/Greasewood (60) - E

Blair/Greasewood (61) - SE

Blair/Greasewood (62) - SW

Blair/Greasewood (63) - SW

Blair/Greasewood (64) - SW

Blair/Greasewood (65) - W

Blair/Greasewood (66) - S

Blair/Greasewood (67) - SE

Blair/Greasewood (68) - S

Blair/Greasewood (69) - ESE

Blair/Greasewood (70) - N

Blair/Greasewood (71) – SE

Blair/Greasewood (72) - SE

Blair/Greasewood (73) - NE

Blair/Greasewood (74) - E

Blair/Greasewood (75) - N

Blair/Greasewood (76) - N

Blair/Greasewood (77) - W

Blair/Greasewood (78) - N

Blair/Greasewood (79) - NE

Blair/Greasewood (80) - NE

Blair/Greasewood (81) - NE

Blair/Greasewood (82) - NE

Blair/Greasewood (83) - NE

Blair/Greasewood (84) - NE

Blair/Greasewood (85) - NE

Blair/Greasewood (86) - W

Blair/Greasewood (87) - W

Blair/Greasewood (88) - N

Blair/Greasewood (89) - N

Blair/Greasewood (90) - NNE

Blair/Greasewood (92) -WSW

Blair/Greasewood (93) - NE

Blair/Greasewood (94) - W

Blair/Greasewood (95) - S

Blair/Greasewood (96) - E

Blair/Greasewood (97) - W

Blair/Greasewood (98) - W

Blair/Greasewood (99) - E

Blair/Greasewood (100) - W

Blair/Greasewood (101) - NW

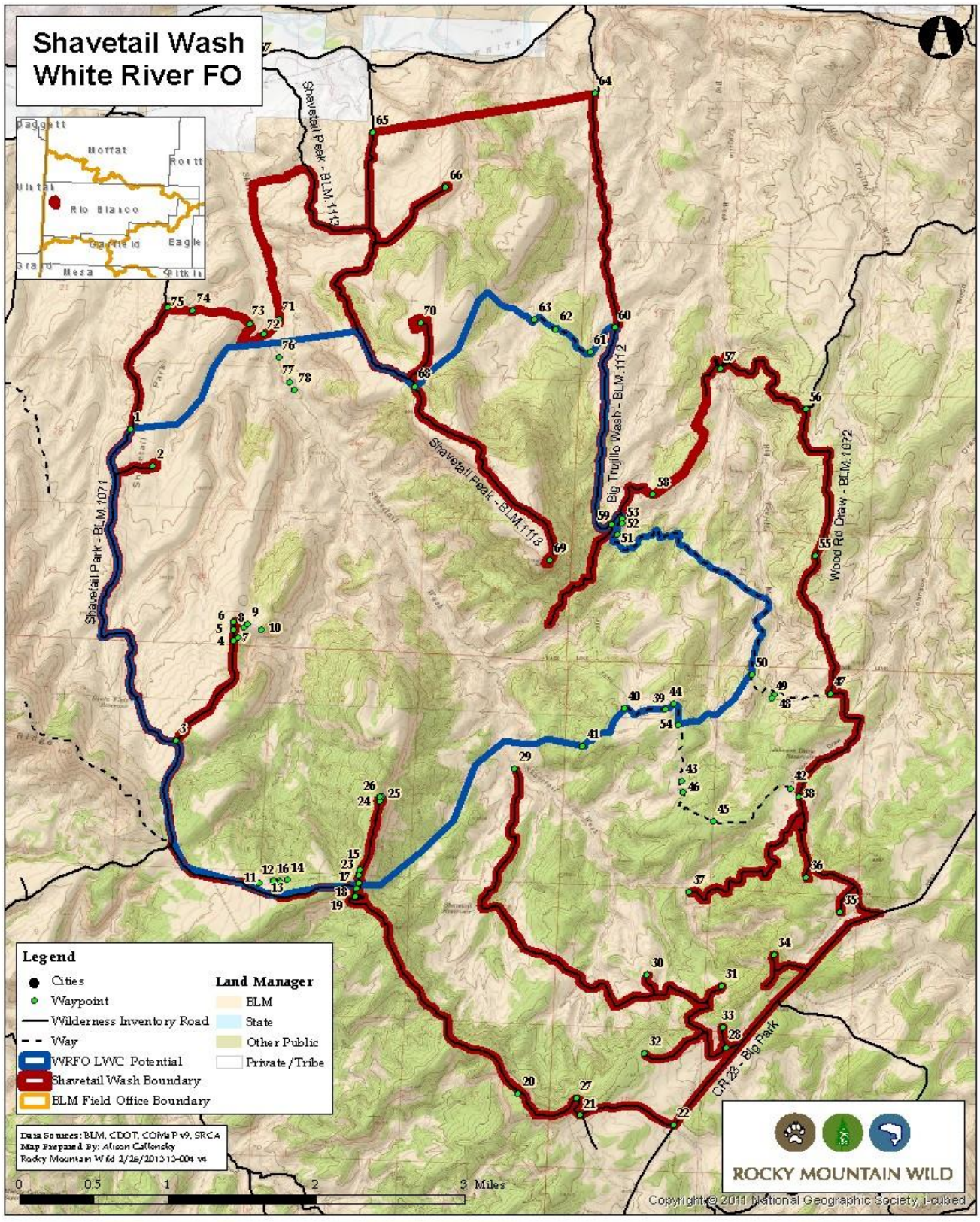
Blair/Greasewood (104) - Solitude

Blair/Greasewood (105) - Natural

Lands with Wilderness Characteristics Recommendations: Shavetail Wash

Shavetail Wash, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Shavetail Wash
White River FO
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
Shavetail Peak - BLM 1113
Shavetail Park - BLM 1071
Big Trujillo Wash - BLM 1112
Wood Rd Draw - BLM 1072
CR 23 - Big Park
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Shavetail Wash 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 2/26/2013 13-004 v4
0
0.5
1
2
3 Miles
ROCKY MOUNTAIN WILD
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Overview and Boundary Delineation:

Shavetail Wash proposed Lands with Wilderness Characteristics (LWC) unit is a 15,200-acre unit located just south of the White River near Rangely, Colorado. The unit is centered on Shavetail Wash—an impressive drainage lined with flat-topped mesas and broken sandstone walls. On the north and west of the unit, the large flat expanse of Shavetail Park contains invaluable habitat for white-tailed prairie dogs, greater sage-grouse, and mule deer. At the highest reaches of the unit, vast pinon-juniper woodlands frame outstanding views of the most remote regions of western Colorado and eastern Utah. The unit's boundaries are roughly defined by Shavetail Park Rd (BLM 1071) on the west and Rio Blanco County Road 23 and BLM 1072 on the east. Several oil and gas well pad access roads are cherrystemmed into the unit, primarily on the southeastern boundary; however, because of the large size and convoluted topography of this unit, these cherrystemmed roads have little effect on its overall wilderness character. With its grand views, redrock cliffs, cryptobiotic soils, and healthy stands of pinon and juniper, the Shavetail Wash unit offers a unique opportunity in northwest Colorado to experience a landscape typical of those found further south on the Colorado Plateau.

Shavetail Wash was identified by BLM's White River Field Office (WRFO) as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In the report, the BLM identified an area of 7,600 acres around Shavetail Wash (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in the LWC inventory report contain several inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During May and September of 2012, The Wilderness Society visited the Shavetail Wash area to conduct an in-depth, on-the-ground field inventory of the Shavetail Wash LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this particular case, TWS identified numerous adjustments that should be made to the BLM's proposed Shavetail Wash LWC boundary in order to bring it in line with the policies laid out in Manual 6310. Once these adjustments are made, a more complete picture of the area's outstanding wilderness character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Shavetail Wash proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Shavetail Wash unit comprises a block of 15,200 contiguous roadless acres. 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). All photopoints referred to in the narrative below can be seen in the attached photosheet for Shavetail Wash.

The northwestern corner of the BLM's desktop inventory boundary for Shavetail Wash is represented by Waypoint 1. This boundary line heads directly east across a sagebrush flat and then northeast across the steep face of a ridge above Shavetail Wash; the boundary is then drawn directly across Shavetail Wash to its intersection with BLM 1113. This boundary follows no existing road of any kind, nor does it appear to follow any other qualifying feature for a LWC boundary. This northern boundary of the unit should instead be moved further north to the WIR that accesses Shavetail Wash at Waypoint 75.

The western boundary of the unit generally follows BLM 1071 (Shavetail Park Rd.) south from Waypoint 75 to the pass between the Cottonwood Creek and Shavetail Wash drainages. However, two cherrystemmed roads were cut out of the BLM's desktop inventory unit and are described here. The first is a short access road leading to the fenced water impoundment at Waypoint 2. This route showed signs of recent use and maintenance and had the obvious purpose of providing access to the functioning pond at Waypoint 2. The second is an unnamed BLM road heading northeast at Waypoint 3; this route once provided access to two dry and abandoned wells along the ridge overlooking Shavetail Wash. Although these well pads are significantly reclaimed and substantially natural in appearance, their access road appears to be regularly maintained to the flagged stakes and pending well pad construction at Waypoints 5 and 6. A spur route leaves this road at Waypoint 4 and heads east and downhill to a large flat area; this route has no known purpose, is clearly not maintained in any way, and disappears completely after less than a quarter mile and is not a WIR.

The BLM's southern boundary for the Shavetail Wash unit follows the ridgeline separating Cottonwood Creek from Shavetail Wash. This boundary road appears to be maintained and receives regular use for people accessing the excellent primitive camping and lookout spots at Waypoints 24 through 26. At Waypoint 11, an old road departs this boundary road and parallels it. This spur route once provided access to the dry and abandoned well pad at Waypoint 12; a user-created route, or possibly an old seismic exploration line, continues east from this well pad to Waypoint 15. As seen in Waypoints 13 through 15, while this spur route appears to have been constructed using mechanical means, it is no longer regularly maintained and is impassable to most vehicles at this time. At the terminus of this route (Waypoint 15), the route is so overgrown with small sagebrush and cryptobiotic soils as to be nearly invisible. This route does not qualify as a WIR and should be left in the unit.

At Waypoint 18, a route leads north to the aforementioned ridge-top campsites at Waypoint 24, while another route leads south and east above Shavetail Wash (Waypoints 18 and 19) to an intersection with CR 23 (Waypoint 22).

However, the BLM's boundary recognizes neither of these roads, and instead cuts northeast, directly down the steep slopes above Shavetail Wash and eventually across this feature into Big Trujillo Wash to the east. This boundary line does not follow any former or existing road, nor does it follow any feature, such as a developed right-of-way or land ownership boundary that could qualify it as a Wilderness Inventory Road. Instead of drawing a random boundary here, the true boundary of the unit should be draw to follow the rough but apparently maintained road represented by Waypoints 18, 19, 20, and 22.

It may be that the BLM chose to draw the random southeastern boundary mentioned above in order to cut out the two dead-end access roads which depart CR 23 and lead to several active oil and gas wells in, or on the periphery of, Shavetail Wash proper. These roads—represented by the line between Waypoints 28 and 29, and the line between Waypoints 35 and 40—are comprised of sections that are regularly maintained, see regular use, and have obvious purposes of providing access to active oil and gas facilities. However, because these roads are situated in heavily vegetated pinon-juniper woodlands and often abut high cliffs or other screening features, they should not be simply cut out of the unit, but rather cherrystemmed into it. BLM Manual 6310 states that "[a] dead-end (cherry-stem) road can form the boundary of an inventory area and does not by itself disqualify an area from being considered 'roadless.'"

The Shavetail Wash oil and gas well pad access road beginning at Waypoint 28 is a signed, but unnamed or numbered, "dead end" BLM road. The road leads to the active well pad at Waypoint 29. Three short spur roads depart the main route near its intersection with CR 23 and lead to active well pads at Waypoints 30, 31, and 32; these have been cherrystemmed into the unit. A producing well pad at Waypoint 34 has also been cherrystemmed into the unit near CR 23.

The eastern boundary of our proposed Shavetail Wash LWC unit follows BLM 1072 from its intersection with CR 23 to a point where it intersects an unnamed BLM road leading into Big Trujillo Wash at Waypoint 56. At the southern end of this boundary, three short cherrystems were drawn into the unit to account for the fact that they are maintained roads leading to producing well pads (Waypoints 35, 36, 37). At Waypoint 38, the boundary road BLM 1072 continues northeast, while the signed BLM 1112 heads to the northwest. [This route, signed as BLM 1112 (Waypoint 38), does not show up as BLM 1112 (Big Trujillo Wash) on the BLM's GIS road layer, but as an unnamed but open and motorized BLM road. On the BLM's GIS road layer, BLM 1112 is further north.] This route may have been constructed to provide access to the plugged and abandoned well at Waypoint 41. This route is overgrown and receives little use as it has no outlet. Waypoints 38, 39, and 40 show the condition of this route in summer of 2012. Based on the size and quantity of the vegetation growing within the roadway, it does not appear to have been recently maintained. At Waypoint 40, the route's character becomes considerably rougher and at Waypoint 41 it disappears entirely where it encounters the overgrown, 10 year-old pad for a plugged and abandoned well. We have opted to remove this route from the unit as it does not appear to meet the criteria for a Wilderness Inventory Road. We have done the same with the obviously unmaintained and abandoned well pad access road at Waypoint 44. This route once led northwest to a decade old plugged and abandoned well and pad. This route has been largely reclaimed and is practically impassable.

At Waypoint 54 the BLM's boundary line crosses the way mentioned in the paragraph above and heads east down an undisturbed slope, intersecting with the unmaintained way at Waypoint 50. This route is labeled as Big Trujillo Wash – BLM 1112 in the BLM's GIS road layer. However, this route, shown in Waypoints 47, 51 and 52, is entirely overgrown and appears to be naturally reclaimed. At the westernmost end of this route, there is some evidence of recent use;

however, that use appears to be associated with the short section of grazing fence (Waypoint 53) as the tread does not continue south or east of Waypoint 52. This section of Big Trujillo Wash Rd (BLM 1112) does not meet the criteria for a WIR, and as such the boundary should be moved further to the north and east.

Because the section of BLM 1112 between Waypoints 47 and 53 does not meet the criteria of a WIR, the boundary should instead be moved east, to the maintained and popular BLM 1072. This route sees regular use by OHV users and others, and shows signs of regular maintenance, including blading. At Waypoint 56, a recently bladed road heads northwest into Big Trujillo Wash. Although the route becomes faint in the vicinity of the wash bottom (Waypoint 57), it quickly recovers and shows signs of maintenance where it parallels the grazing fencing at Waypoint 58. This route then connects with the bladed portion of Big Trujillo Wash Road (BLM 1112) just west of Waypoint 53. This route should form the northeastern boundary of the Shavetail Wash unit as shown in the map above.

The easternmost point of the BLM's northern boundary for this unit meets BLM 1112 at Waypoint 60. This route shows sign of blading during original construction, particularly where it once crossed an arroyo at Waypoint 63. Yet, this route is no longer maintained to ensure regular and continuous use. The route is overgrown in numerous locations and large patches of cryptobiotic soils were found growing in the old tracks along this route. At Waypoint 63, the route has washed away and erosion is reclaiming the original counters of the hillside leading down into the arroyo; large sagebrush and other shrubs are growing directly in the path of the route, making passage by most vehicles, including OHVs, difficult to impossible. The BLM's desktop inventory boundary continues beyond here to its intersection with the Shavetail Peak Road (BLM 1113) at Waypoint 68. The route between Waypoints 60 and 68 is not a WIR and thus the boundary should be moved further north; the next qualifying feature to the north is the large power lines at Waypoint 64.

Although the northern entrance to the Shavetail Park road (BLM 1113) is located on private land and is signed as closed to public access (Waypoint 67), this route did seem to be regularly maintained, at least to provide ongoing access to the producing well pad at Waypoint 70. The maintenance may continue beyond this pad to the dry and abandoned well, and nearby overlook point on the summit of Shavetail Peak at Waypoint 69. If there is no public access to this road, it can be assumed that maintenance beyond the producing well pad does not occur and thus the cherrystemmed road that we have drawn as ending at the top of Shavetail Peak should instead be shortened to its terminus at the producing well pad at Waypoint 70.

Finally, as mentioned in the first paragraph of this section, the BLM's desktop inventory boundary beginning at Waypoint 1 does not follow an existing road or other defining feature and thus should be moved further north to the bladed and maintained road at Waypoint 75. This route passes a producing well pad at Waypoint 74 and continues east into Shavetail Wash proper. The route crosses two cattle guards on either side of Shavetail Wash and then heads north down the wash. This maintained route is the logical northern boundary for this unit. A small way heads into the unit at Waypoint 72, but this way quickly becomes too overgrown for passage and does not appear to be regularly maintained in any form (Waypoints 77, 78).

After incorporating the numerous boundary adjustments listed above and shown on the attached map, the Shavetail Wash unit contains 15,200 contiguous roadless acres of BLM lands and thus meets the size criterion as outlined in BLM Manual 6310.

II. Shavetail Wash proposed LWC is primarily affected by the forces of nature.

To the average visitor, the 15,200-acre Shavetail Wash unit would appear to be in a natural condition primarily affected by the forces of nature. The landscape of the unit is very convoluted and diverse (Waypoint 83), with broken sandstone cliffs (Waypoint 80), high tilted mesas (Waypoint 82), flat and pristine sagebrush parks, thickly vegetated washes and arroyos (Waypoint 16), and rolling pinon-juniper woodlands (Waypoint 10). Because of this convoluted and irregular landscape, the primary human impacts affecting the unit—oil and gas well pads and motorized vehicle routes—are in general very well shielded from view or have naturally reclaimed to the point where the casual visitor would have a very difficult time differentiating them from the surrounding terrain.

Our boundaries for the area have cherrystemmed or cut out all producing well pads, yet numerous dry and abandoned well locations were left inside the unit. The vast majority of these well locations are decades old, with several abandoned wells dating as far back as the 1950s. Because of the age of these well locations, and the fact that many of them never produced, the well pads associated with them have a natural appearance and are often very difficult to differentiate from the surrounding terrain. Although the number of these old well locations is relatively high, neither individually nor collectively do they have a detrimental impact on the overall naturalness of the 15,200-acre LWC.

Our proposed boundaries for the Shavetail Wash unit contain several cherrystemmed roads leading into the unit. These range in length from less than a tenth of a mile to nearly four miles. Yet these routes are located primarily above and out of site from the bulk of the Shavetail Wash unit. Only a single cherrystemmed road leads into the wash itself (Waypoint 29), while the rest of these cherrystemmed routes are located either higher up on the surrounding ridges and mesas (Waypoints 3, 26, and 69), or they are screened by dense pinon-juniper stands (Waypoints 23, 56). Because of the physical location of these cherrystemmed routes and the broken nature of the surrounding terrain, the cherrystemmed routes are rarely within sightlines of casual travelers recreating within the unit; in general, one must be right upon the cherrystemmed route in order for it to be visible. For these reasons, neither the cherrystemmed routes nor the antiquated well pads of the Shavetail Wash unit or surrounding environs eliminate the appearance of naturalness for the area, and the unit as a whole retains its appearance of being affected primarily by the forces of nature.

III. Shavetail Wash proposed LWC provides outstanding opportunities for solitude and primitive recreation.

In a region with very few large bodies of wilderness-quality lands remaining, Shavetail Wash's size alone sets it apart as a unique landscape where one can find abundant opportunities for solitude and primitive recreation. During our three visits to the area in May and September of 2012, we encountered other human beings on only four occasions, and all of those occurred outside of the unit boundaries near the oil and gas facilities in the southeast corner of the unit near CR23. No human contact was made during our longer hikes into lower Shavetail Wash or along the ridges in the southern half of the unit, nor did we encounter any other human beings during a full day weekend ATV exploration of the area in September. Despite its proximity to the town of Rangely, solitude is something that is readily found in the Shavetail Wash unit.

The old unmaintained routes within the Shavetail Wash unit provide outstanding opportunities for primitive and unconfined recreation including mountain biking, hiking, horseback riding, and hunting. In the numerous areas of the unit that do not have any formal trail or route development, primitive backpacking, bird watching, wildlife viewing,

hunting, and climbing opportunities exist. We were able to enjoy an outstanding hike along a high ridge in the southern portion of the unit, where we watched birds soar along the vertical cliffs below us, while enjoying outstanding views toward the White River and the Raven Ridge proposed LWC to the north.

VIII. Shavetail Wash proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen* found Shavetail Wash proposed LWC to contain numerous supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. The area's location near the White River causes it to be prime foraging habitat for bald eagles and other birds utilizing the river corridor. Colorado Parks and Wildlife (CPW) recognizes nearly the entire Shavetail Wash unit as winter range for mule deer, and a large corridor near the White River as severe winter and winter concentration areas for pronghorn. The flat sagebrush steppes of the Shavetail Park area are recognized as historic habitat for the greater sage-grouse—a bird whose numbers are in severe decline and which the U.S. Fish and Wildlife Service has put on the candidate list for Endangered Species Act protections—and over 3,600 acres of the unit are identified by Colorado Parks and Wildlife as Preliminary General Habitat (PGH) for the bird. Besides the wildlife values of the unit, ephedra buckwheat—a globally vulnerable plant species that is currently recognized by BLM as a sensitive plant species—can be found in the northwest corner of the unit. By protecting the wilderness qualities of this unit, these supplemental values would likely be enhanced as well.

Summary Conclusion

Our extensive on-the-ground inventory of the Shavetail Wash proposed LWC shows that the BLM's 2012 *Non-WSA Lands with Wilderness Characteristics Inventory Update* was correct in identifying the area around Shavetail Wash as potentially containing wilderness character. However, the BLM's desktop inventory of the unit did not adequately define the area of contiguous roadless lands and thus any determination as to the area's wilderness character was not based on the entirety of the qualifying area.

Our inventory has documented necessary boundary adjustments as well as the wilderness characteristics of the area. It is imperative that the BLM now do the same, before any land management decisions are made that might negatively affect these outstanding characteristics of the area.

This overview provides new information, including maps and photos, documenting that the 15,200 acre Shavetail Wash unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Shavetail Wash Photopoints

The following photographs correspond with the numbered icons on the attached Shavetail Wash unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Shavetail (1) - W

Shavetail (2) - N

Shavetail (3) - NE

Shavetail (4) - NE

Shavetail (5) - N

Shavetail (6) - N

Shavetail (7) - NE

Shavetail (8) - NE

Shavetail (9) - E

Shavetail (10) - SE

Shavetail (11) - E

Shavetail (12) - E

Shavetail (13) - ENE

Shavetail (14) - E

Shavetail (15) - W

Shavetail (16) - N

Shavetail (17) - ESE

Shavetail (18) - SSW

Shavetail (19) - E

Shavetail (20) - W

Shavetail (21) - W

Shavetail (22) - WNW

Shavetail (23) - N

Shavetail (24) - S

Shavetail (25) - N

Shavetail (26) - WNW

Shavetail (27) - NW

Shavetail (28) - SW

Shavetail (29) - SE

Shavetail (38) - NW

Shavetail (39) - W

Shavetail (40) - S

Shavetail (42) - N

Shavetail (43) - E

Shavetail (44) - NW

Shavetail (45) - N

Shavetail (46) - SSW

Shavetail (47) - WSW

Shavetail (48) - S

Shavetail (49) - S

Shavetail (51) - SE

Shavetail (52) - SW

Shavetail (53) - S

Shavetail (55) - SW

Shavetail (56) - W

Shavetail (57) - NW

Shavetail (58) - NE

Shavetail (59) - ENE

Shavetail (60) - W

Shavetail (61) – S

Shavetail (62) - W

Shavetail (63) - SW

Shavetail (64) - WNW

Shavetail (67) - SSW

Shavetail (71) - NNE

Shavetail (72) - E

Shavetail (73) - NNE

Shavetail (74) - Ne

Shavetail (75) - E

Shavetail (76) - S

Shavetail (77) - SSE

Shavetail (78) - SE

Shavetail (79) - Solitude

Shavetail (80) – Naturalness,

Shavetail (81) – Solitude, Naturalness

Shavetail (82) - Solitude

Shavetail (10) – Solitude, Naturalness

Shavetail (16) - Solitude

Shavetail (83) - Solitude

Shavetail (17) - Naturalness

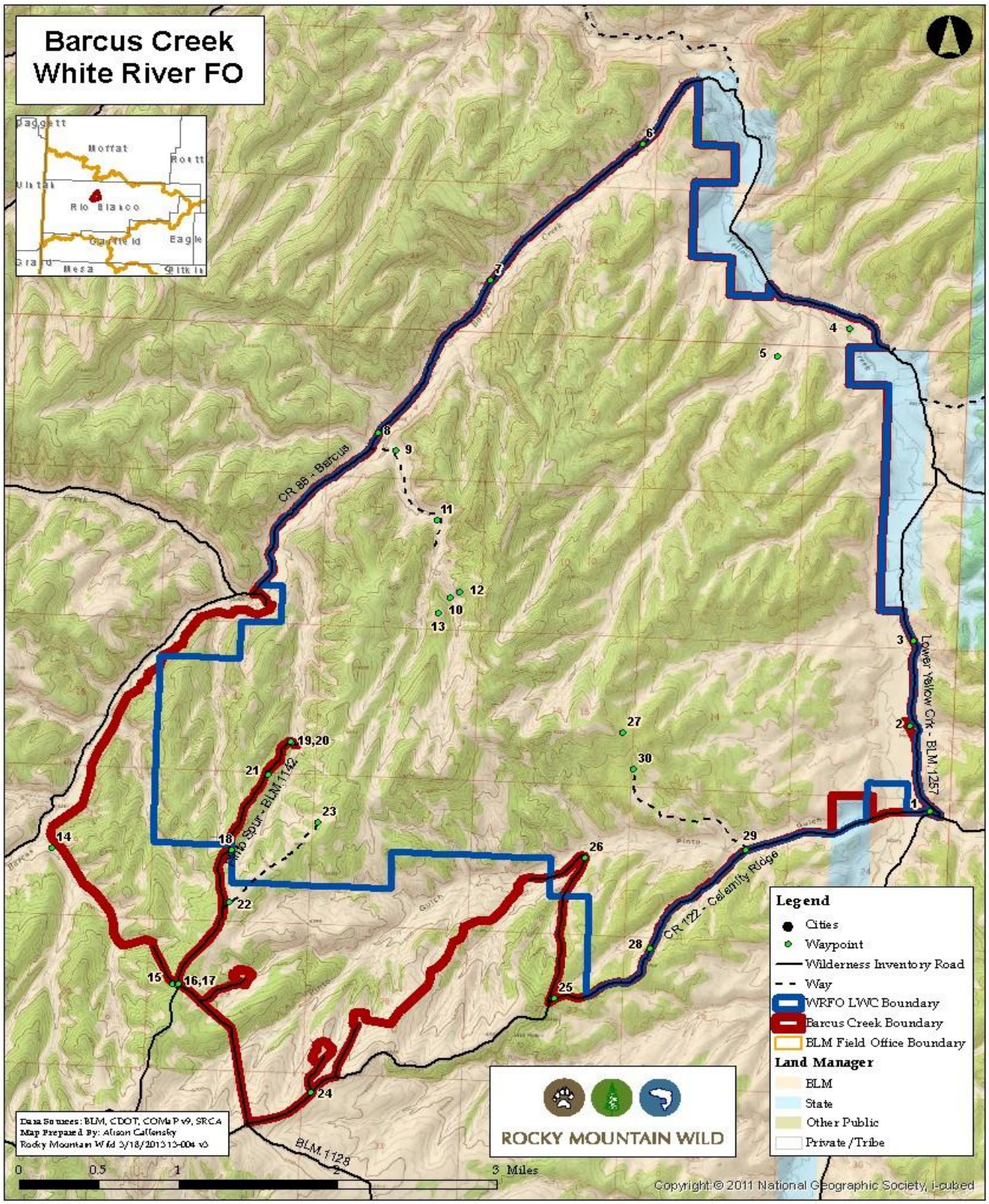
Shavetail (21) – Climbing

Shavetail (26) – Naturalness, Rec.

Lands with Wilderness Characteristics Recommendations: Barcus Creek

Barcus Creek. *Photo: Kurt Kunkle*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Barcus Creek
White River FO
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
CR 88 - Barcus
Lower Yellow Crk - BLM 1257
Rio Spur - BLM 1142
CR 122 - Calamity Ridge
BLM 1128
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Boundary
Barcus Creek 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 3/18/2013 13-004 v3
ROCKY MOUNTAIN WILD
0
0.5
1
2
3 Miles
Copyright © 2011 National Geographic Society, i-cubed

Overview and Boundary Delineation:

The Barcus Creek (Polygon 11) proposed Lands with Wilderness Characteristics unit (LWC) is about 20 miles directly west of Meeker, Colorado, in Rio Blanco County. The 12,250 acre unit consists of rolling hills and subtle drainages. Barcus Creek, along the northwestern boundary, and Yellow Creek, along the eastern boundary, join at the northern tip of the unit and flow into the mighty Yampa River. The only named drainage in the unit is Pinto Gulch. The Barcus Creek unit is part of a complex of LWC units we are calling the Calamity Ridge complex, which includes Greasewood Gulch, Blair Mountain, Boise Creek and Hammond Draw. The unit is bounded on the east by BLM road 1257, on the northwest by CR 88 and on the south by CR 122 and current drilling activity. Pinion-juniper woodlands dominate the uplands and big basin sagebrush in the bottom lands. The unit is home to deer, golden eagles, and a variety of other wildlife.

Barcus Creek was identified by BLM's White River Field Office as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In their report, the BLM identified an area of 10,300 acres (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in their LWC inventory report contain several inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During the summer of 2012, Conservation Colorado visited the Barcus Creek area to conduct an in-depth, on-the-ground field inventory of the Barcus Creek LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this particular case, Conservation Colorado identified several adjustments that should be made to the BLM's proposed Barcus Creek LWC boundary in order to bring it in line with the policies laid out in Manual 6310. Once these adjustments are made, a more complete picture of the area's outstanding wilderness character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary changes:

I. Barcus Creek proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Barcus Creek unit comprises a block of 12,250 acres of contiguous roadless acres. 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 road, 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). All photo points referred to in the narrative below can be seen in the attached photo sheet for Barcus Creek.

Conservation Colorado made a few adjustments to the BLM boundary. On the eastern boundary, a solar stock tank was excluded and the southern boundary was redrawn; see details below.

The eastern boundary generally follows BLM route 1257 and state land boundaries. Waypoint 1 in the southeast shows the beginning of BLM 1257. Waypoint 2 shows the stock tank that has been drawn out of the unit.

Waypoints 6 and 7 show the north eastern boundary road (boundary road is in the foreground of photo 6). BLM route 1143 enters the unit along CR 88. Conservation Colorado agrees with the BLM that this route is a 'way' and can be included in the unit as demonstrated by Waypoints 8, 9, and 10.

The southern portion of the BLM boundary appears to follow section and subsection lines. Conservation Colorado has redrawn the south and southeast boundary to be consistent with current policy. The boundary southeast of the intersection of CR88 and BLM 1033 is drawn to exclude a pipeline that follows CR 88.

Waypoints 14, 15 and 16 show the pipeline and road to a well pad that define the southeastern boundary. Two cherrystems are present on the southeastern boundary. Waypoints 17, 18 and 19 show the cherrystemmed BLM route 1142. Waypoint 20 shows the large stock pond at the end of BLM 1142. The other cherrystem excludes an active well pad.

Waypoint 24 shows an active well pad along CR 122. At this point, the boundary leaves the road and follows natural features to exclude heavy drilling activity. Waypoints 25 and 26 show a road that goes to a well pad and acts as a boundary. The BLM boundary here was adjusted to exclude the road. Waypoints 27, 29 and 30 show a 'way' that enters the unit from CR 122.

II. Barcus Creek LWC is primarily affected by the forces of nature.

Barcus Creek has been affected primarily by the forces of nature and all human impacts within the unit are substantially unnoticeable. Waypoints 2, 4 and 5 show the natural landscape on the eastern portion of the the unit. Waypoints 11, 12 and 13 show the interior of the unit in its natural condition. There are two defunct stock ponds off of BLM 1143 that are recovering to a natural state through erosion and revegetation. Waypoint 21 shows the natural landscape in the southern portion of the unit. Waypoint 28 shows the natural landscape as seen from CR 122.

III. Barcus Creek LWC provides outstanding opportunities for solitude and primitive recreation.

The Barcus Creek unit is comprised of mainly low rolling hills with long sag- filled drainages. This landscape is perfect for exploring and finding outstanding solitude. One can hike up the various drainages from the easily accessible boundary roads and camp deep inside the area. The variety of rolling hills and pinyon juniper forests provide excellent screening, allowing for exceptional solitude opportunities. The cattle trails in the eastern portion of the unit make for excellent

horseback riding. In addition to hiking, camping and horseback riding, the unit provides outstanding opportunities for nature photography, nature study and hunting.

VIII. Barcus Creek LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Barcus Creek LWC unit has significant supplemental values that should be considered. This report only evaluates the supplemental values identified by the Colorado Parks and Wildlife and the Colorado Natural Areas Program. Historic, geologic, cultural and other values must be researched for a complete picture of the supplemental values represented in the Barcus Creek LWC.

Colorado Parks and Wildlife has identified the following wildlife values within the unit: active golden eagle nest sites, greater sage-grouse historic habitat, and critical winter, severe winter range and winter concentration areas for mule deer.

The Colorado Natural Areas Program has identified biological values for the Barcus Creek unit. The Dudley Bluffs Potential Conservation Areas, Piceance Networks of Conservation and the Yellow Creek Riparian Landcover Potential Conservation Areas all overlap the LWC unit. The Bulrush and Wet Meadow Element Occurrences and the Many-stem Stickleaf Element Occurrence also are found at Barcus Creek.

Summary Conclusion

Our on-the-ground inventory of the Barcus Creek shows that the BLM was correct in identifying this landscape as having Lands with Wilderness Characteristics. With the additional field work, the southern boundary can be redrawn based on on-the-ground features.

The Barcus Creek unit is a unique area that provides solitude and primitive recreation. Taken in the context of the larger landscape that is experiencing pressure from drilling activity, protecting the LWC characteristics not only provides people with the opportunity to experience this naturally beautiful landscape on its own terms, but also helps maintain the ecological integrity of the region.

Our inventory has documented suggested boundaries as well as the wilderness characteristics located in the Barcus Creek unit. It is imperative that the BLM give this unit a full inventory to document these and any additional outstanding wilderness characteristics before any land management decisions are made that might negatively affect these resources.

This overview provides new information, including maps and photos, documenting that the 12,250-acre Barcus Creek unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Barcus Creek Photopoints

The following photographs correspond with the numbered icons on the attached Template unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Barcus (1) - NE

Barcus (2) - W

Barcus (3) - W

Barcus (4) - SE

Barcus (5) - SW

Barcus (6) - SE

Barcus (7) - SE

Barcus (8) - E

Barcus (9) - SE

Barcus (10) - SW

Barcus (11) - NW

Barcus (12) - S

Barcus (13) - E

Barcus (14) - SE

Barcus (15) - NW

Barcus (16) - SE

Barcus (17) - NE

Barcus (18) - N

Barcus (19) - NE

Barcus (20) - SE

Barcus (21) - N

Barcus (22) - NW

Barcus (23) - N

Barcus (24) - N

Barcus (25) - N

Barcus (26)

Barcus (27) - NW

Barcus (28) - NW

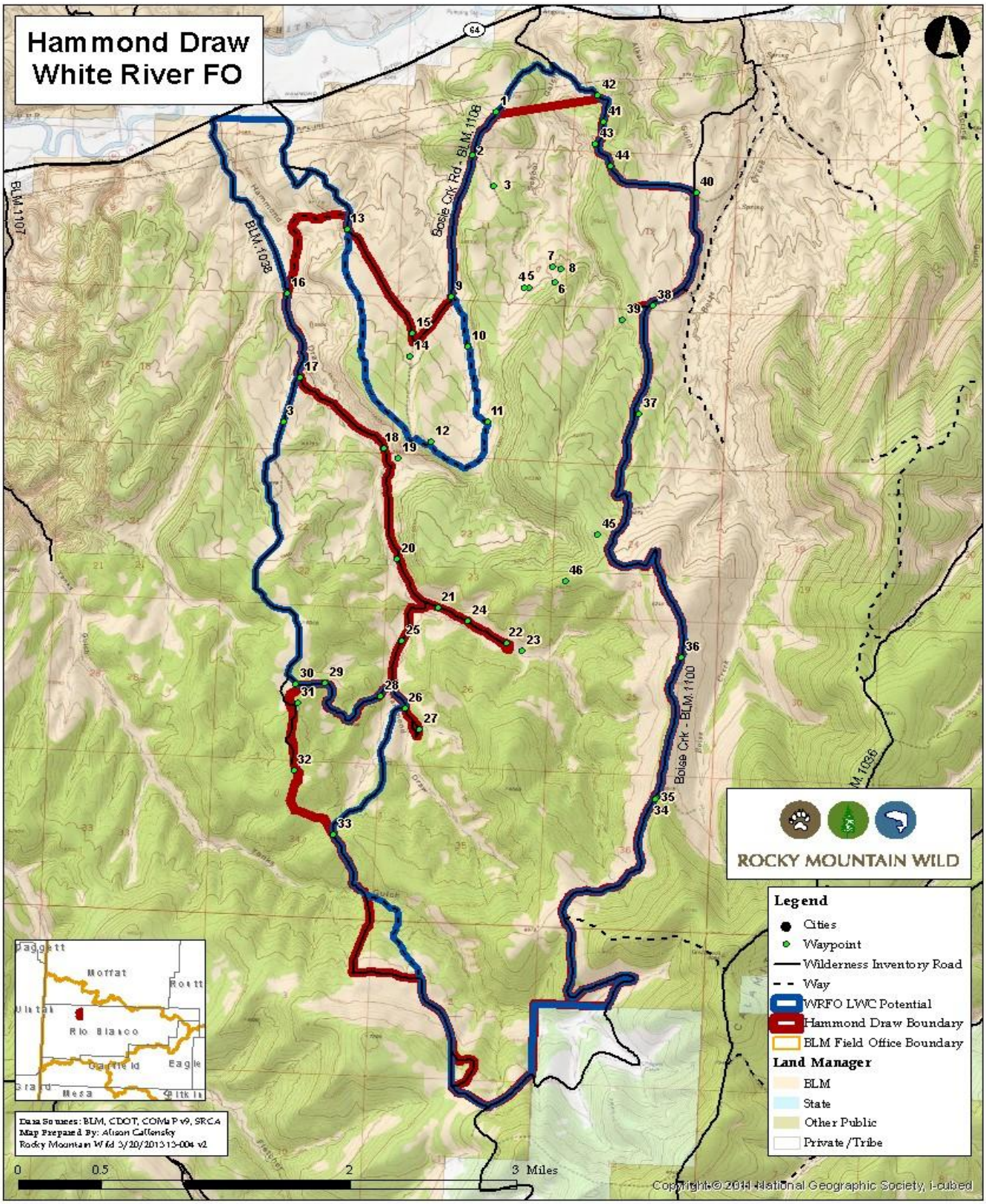
Barcus (29)

Barcus (30)

Lands with Wilderness Characteristics Recommendations: Hammond Draw

Hammond Draw. *Photo: Kurt Kunkle*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Hammond Draw
White River FO
BLM 1107
BLM 1028
Boise Crk Rd - BLM 1108
Boise Crk - BLM 1100
BLM 1035
ROCKY MOUNTAIN WILD
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Hammond Draw Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private / Tribe
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 3/20/2013-13-004 v2
0
0.5
2
3 Miles
Copyright © 2011 National Geographic Society, i-cubed

Overview and Boundary Delineation:

The Hammond Draw proposed Lands with Wilderness Characteristics unit (LWC) is about 12 miles directly east of Rangely, Colorado, in Rio Blanco County. The 6,100 acre unit consists of a diversity of unnamed mesas, and drainages include parts of Hammond Draw. A nice mix of pinion-juniper woodlands, grassy meadows and brush lands are found in Hammond Draw. Mule deer, elk, bald eagles and sage grouse can be observed in the unit. The Hammond Draw unit is part of a complex of LWC units we are calling the Calamity Ridge complex, which includes Greasewood Gulch, Blair Mountain, Barcus Creek and Boise Creek. The unit is bounded on the north by power lines and BLM road 1106, on the east by BLM road 1100, and on the west by BLM Road 1038.

Hammond Draw was identified by BLM's White River Field Office as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In their report, the BLM identified an area of 6,600 acres (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in their LWC inventory report contain several inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During the summer of 2012, Conservation Colorado visited the Hammond Draw area to conduct an in-depth, on-the-ground field inventory of the Hammond Draw LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this case, Conservation Colorado identified several adjustments that should be made to the BLM's proposed Hammond Draw LWC boundary in order to bring it in line with the policies laid out in Manual 6310. Once these adjustments are made, a more complete picture of the area's outstanding wilderness character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary changes:

I. Hammond Draw proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Hammond Draw unit comprises a block of 6,100 acres of contiguous roadless acres. 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 road, 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). All Waypoints referred to in the narrative below can be seen in the attached photo sheet for Hammond Draw.

Conservation Colorado made some major adjustments to western boundary of the unit.

Beginning on the northeast part of the unit, Waypoints 1 and 42 show the power line which defines this section of the boundary. The boundary has been redrawn to follow BLM road 1106 rather than the unnumbered 'ways' the BLM used. Waypoints 9 and 15 show BLM road 1106. Waypoints 2, 3 and 4 show a way that enters the unit and accesses some old borrow pits and stock ponds. Waypoints 9 through 14 show the 'ways' that the BLM used as the boundary road. These routes have not been constructed and are not maintained; therefore, they are 'ways' and can be included in the unit.

The northwestern boundary was redrawn to exclude some lands that are not natural due to a combination of vehicle routes, some old mining scars and stock ponds. Waypoint 16 shows where the new boundary route joins with BLM 1038.

Waypoint 17 shows a route off of BLM 1038 that we are now using as the boundary; this route can be seen in Waypoints 20, 21 and 25. The sections of the route that cross the ravines are constructed and appear to be maintained and the route appears to get regular use, so we are using it as a boundary and excluding it from the unit. If the BLM feels strongly that this route is not a road or a good boundary, then we would support moving the boundary back to BLM 1038 as originally drawn by the BLM. Three spurs enter the unit from this road. The first can be seen in Waypoints 18 and 19; this route is a way and has been left in the unit. The second route goes to a large stock pond and has been cherrystemmed out of the unit; it can be seen in Waypoints 21 and 22. The third route has also been excluded from the unit; the stock pond at its end can be seen in Waypoint 27.

Waypoints 26 and 33 show the route the BLM used as the boundary road. This route does not appear to be maintained or regularly used so it has been included in the unit. Waypoints 28 and 29 show the route that Conservation Colorado is using as the boundary; it appears to have been constructed and possibly maintained. The western boundary continues south, following BLM 1038 and a pipeline; see Waypoints 31, 32 and 33. South of Waypoint 3, Conservation Colorado uses the pipeline as the boundary and not the continuation of BLM 1038; this section of route is not maintained and access to this route from the south is closed off by the drilling activity occurring in the area.

The eastern boundary follows BLM 1100 and can be seen in Waypoints 35, 36 and 40. The northeast corner of the unit follows an unnumbered BLM route that connects BLM 1100 with BLM 1106; it can be seen in Waypoints 41 and 44. A route enters the unit along the eastern boundary seen in Waypoint 38 and 39; this route is a way.

II. Hammond Draw LWC is primarily affected by the forces of nature.

Hammond Draw has been affected primarily by the forces of nature and all human impacts within the unit are substantially unnoticeable. Two boundary adjustments were made to exclude land due to lack of naturalness. As discussed above, the northwestern part of the unit was excluded because of cumulative impacts. A small change was made at Waypoint 30 where a well pad has been excluded due to lack of naturalness.

The human impacts present in the unit are substantially unnoticeable and do not impact the area's naturalness. Waypoints 6 shows some old borrow pits at the end of the route beginning in Waypoint 2; these are barely noticeable and do not impact the unit's naturalness. There are several stock ponds in the unit: a few have them been drawn out at the end of the cherrystems (photos 27 and 22), and others have remained in the unit. Waypoint 3 shows one of the stock ponds located off of the same route; this pond is defunct and recovering to a natural state through revegetation and erosion.

Waypoints 7 and 8 show some interesting geology that inspires a sense of solitude. It offers some great unconfined recreation and exploration opportunities, while affording excellent views of the area. Waypoints 23, 24 and 27 show the natural qualities of the western part of the unit. Waypoint 34 looks down into the northern portion of the unit, showing the diversity of mesas and drainages and natural landscape. Waypoints 45 and 46 show the center of the unit in its natural condition. Waypoint 43 looks southeast into the unit, showing a natural landscape.

III. Hammond Draw LWC provides outstanding opportunities for solitude and primitive recreation.

The Hammond Draw unit provides outstanding opportunities for solitude and for primitive and unconfined recreation. Due to the variety of land forms in the unit, including mesas, benches, drainages and ridges, both solitude and unconfined recreation are plentiful and outstanding. See Waypoint 34 as an example of the different benches and mesas. One could hike out to the ridge at Waypoint 46 and enjoy 360-degree views and find inspiration from the soaring birds. Or you could enjoy a short hike up the drainage at Waypoint 23 and challenge yourself by climbing to the top of the ridge. And if that not enough, go wander around on the mesa at Waypoint 45 and enjoy the rolling stroll among the grasses and study how a landscape can recover from wildfire.

VIII. Hammond Draw LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

The Hammond Draw area has supplemental values. The boundaries used to identify these values are those described in this report. The values described here are limited to biological values. Further research is needed on cultural, historic, geologic, etc etc to gain a full picture of Hammond Draw's supplemental values.

The BLM's Yanks Gulch Area of Critical Environmental Concern overlaps this unit.

Hammond Gulch provides habitat for the following wildlife as identified by Colorado Parks and Wildlife: greater sage-grouse lek sites, production areas, overall range and historic habitat; bald eagle winter forage and winter range; mule deer critical winter migration corridors and severe winter range; and elk migration and winter concentration area.

The Colorado Natural Areas Program has identified several biodiversity values. The Dudley Bluffs Rare Wildflowers area, the Yanks Gulch Natural Area, the Piceance Networks of Conservation Areas and the School Gulch Potential Conservation Area overlap the unit. Several element occurrences occur within the area: Piceance Twinpod and Mesic Western Slope Pinyon-Juniper Woodlands.

Summary Conclusion

Our on-the-ground inventory of the Hammond Draw shows that the BLM was correct in identifying this unit as having Lands with Wilderness Characteristics. The three boundary adjustments aid in making the unit compliant with current LWC inventory policy. We would favor a larger unit along the western boundary.

The Hammond Draw unit is a unique area that provides solitude and primitive recreation. Taken in the context of the larger landscape that is experiencing pressure from drilling activity, protecting the LWC characteristics not only provides people with the opportunity to experience this naturally beautiful landscape on its own terms, but also helps maintain the ecological integrity of the region.

This overview provides new information, including maps and photos, documenting that the 6,100 acre Hammond Draw unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics unit and its wilderness values protected.

Hammond Draw Photo Points

The following photographs correspond with the numbered icons on the attached Template unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Hammond (1) - E

Hammond (2) - E

Hammond (3) - NW

Hammond (4) - S

Hammond (5) - S

Hammond (6) - N

Hammond (7) - N

Hammond (8) - NE

Hammond (9) - E

Hammond (10) - S

Hammond (11) - SW

Hammond (12) - W

Hammond (13) - S

Hammond (14) - N

Hammond (15) - N

Hammond (16) - N

Hammond (17) - SE

Hammond (18) - SE

Hammond (19) - E

Hammond (20) - S

Hammond (21) - S

Hammond (22) - S

Hammond (23) - N

Hammond (24) - N

Hammond (25) - S

Hammond (26) - W

Hammond (27) - NW

Hammond (28) - W

Hammond (29) - W

Hammond (30) - SW

Hammond (31) - S

Hammond (32) - S

Hammond (33) - NE

Hammond (34) - N

Hammond (35) - S

Hammond (36) - S

Hammond (37) - S

Hammond (38) - W

Hammond (39) - SW

Hammond (40) - S

Hammond (41) - S

Hammond (42) - W

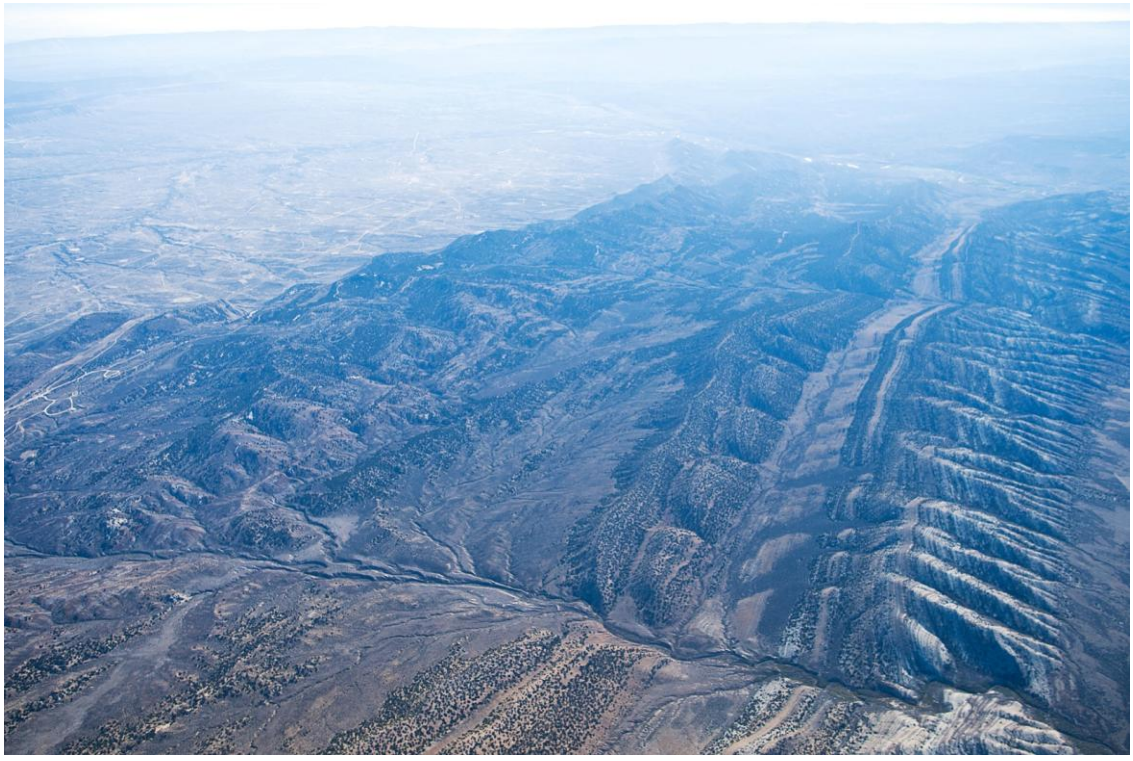
Hammond (43) - SE

Hammond (44) - S

Hammond (45) - N

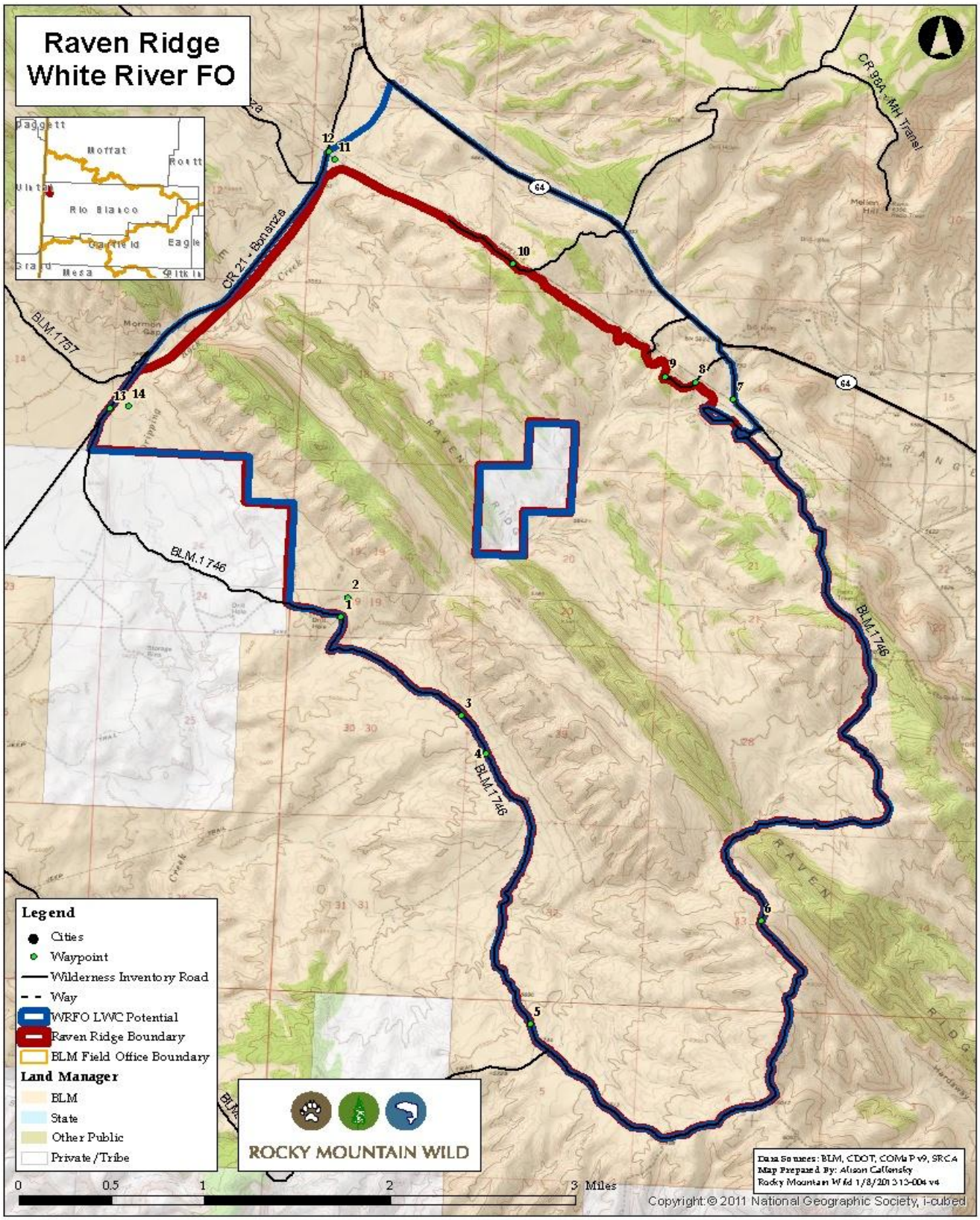
Hammond (46) - W

Lands with Wilderness Characteristics Recommendations: Raven Ridge



Raven Ridge, White River Field Office *Photo: Todd Patrick*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manual's 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and or to assess whether boundary adjustments need to be made to better meet the intent of the BLM's Lands with Wilderness Characteristics policies.


Raven Ridge
White River FO
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
CR 21 - Bonanza
CR 88A - MH Transf
BLM 1757
BLM 1746
RAVEN RIDGE
64
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Raven Ridge Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private / Tribe
ROCKY MOUNTAIN WILD
0 0.5 1 2 3 Miles
Data Sources: BLM, CDOT, COMaP v9, SRC4
Map Prepared By: Alison Caffensky
Rocky Mountain Wild 1/8/2013-004 v4
Copyright © 2011 National Geographic Society, i-cubed

Overview and Boundary Delineation:

The Raven Ridge proposed Lands with Wilderness Characteristics unit (LWC) is situated about nine miles west of Rangely, Colorado, and around six miles south of Dinosaur in Rio Blanco County, near the border with Utah. The unit is bounded on the northwest by the Bonanza Road (CR21), on the southwest and east by BLM 1746 and on the north by a few oil and gas facilities and a large interstate transmission line. A 160-acre private inholding without developed road access lies directly in the center of the unit and is surrounded on all sides by public lands.

The bulk of the 6,600 acre Raven Ridge unit is made up of a series of dramatic northwest to southeast trending ridges or hogbacks that rise to more than 6,100 feet in elevation beginning in Utah and terminating at the White River near Rangely. The escarpment is primarily made up of sandstones, shales, and other sedimentary rocks that have tilted to near vertical and eroded over time into uniquely shaped cliffs and drainages. It is these exposures where numerous species of rare and threatened plant species are found. The surrounding sagebrush and pinyon communities provide habitat for greater sage-grouse, mule deer, and antelope. The area also contains important habitat for white-tailed prairie dogs and was one location for the attempt by the U.S. Fish and Wildlife Service and Colorado Department of Wildlife to reestablish a sustainable population of black-footed ferrets in Colorado.

The area overlaps the Raven Ridge Area of Critical Environmental Concern (ACEC)—a BLM designation first granted in 1986 and subsequently expanded in 1997 to protect several rare plant species and scientifically significant paleontological resources, including perfectly preserved fossils. In the 1997 White River Field Office RMP/ROD, the BLM placed this ACEC under a non-surface occupancy (NSO) stipulation for oil and gas development, designated it as a rights-of-way exclusion area, and limited motorized travel to designated roads and trails. This designation is likely a large reason why the Raven Ridge area retains its natural character and is largely free from roads or other intrusions.

Raven Ridge was identified by BLM's White River Field Office (WRFO) as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In their report, the BLM identified an area of 7,900 acres around Raven Ridge (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in their LWC inventory report contain several inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During July of 2012, The Wilderness Society visited the Raven Ridge area to conduct an in-depth, on-the-ground field inventory of the potential Raven Ridge LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this particular case, TWS identified several adjustments that should be made to the BLM's potential LWC unit boundary at Raven Ridge in order to bring it in line with the policies laid out in Manual 6310—resulting in a decrease in size of the potential LWC unit from 7,900 acres (BLM) to 6,600 (TWS). Once these adjustments are made, a more complete picture of the area's outstanding wilderness character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Raven Ridge proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Raven Ridge unit comprises a block of 6,600 contiguous roadless acres. 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 (Wilderness Inventory Road). 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). All photopoints referred to in the narrative below can be seen in the attached photosheet for Raven Ridge.

The Wilderness Society has found that the BLM's desktop inventory boundary for the Raven Ridge unit largely mirrors the on-the-ground situation, and thus our recommended boundary adjustments for this unit are relatively minor. However, there are a few remnant routes leading into the unit that do not qualify as roads under the current BLM guidelines that we have chosen to highlight here, as well as some boundary adjustments on the north boundary of the unit caused by oil and gas development facilities and other features.

Waypoints 13 and 14 show the "Mormon Gap Revegetation Test Plots", which appear to be long abandoned. The site is overgrown, the fences falling down, and the road neither constructed nor maintained. Waypoints 1 and 2 show an overgrown and unmaintained route with no identifiable purpose which leads up towards the vertical escarpment of Raven Ridge proper. Waypoint 3 shows a segment of what appears to be an old seismic route just off of BLM 1746. This route is nearly impossible to locate on the ground and clearly does not meet the criteria for a Wilderness Inventory Road. There is a decades old plugged and abandoned well at Waypoint 4—although the reclamation effort is poor, the pad is not substantially noticeable from the ground and does not detract from the overall wilderness character of the area. At Waypoint 5 a very short spur route cuts off of BLM 1746 to a small overlook; however, the route was not constructed using mechanical means and appears to have been created through the occasional passage of vehicles.

On the northeastern boundary of the unit, the BLM's desktop inventory shows a boundary along Colorado State Highway 64, north of a prominent transmission line and corridor separating the unit from Highway 64. Waypoints 7, 8, 10, and 11 show this powerline corridor and the accompanying infrastructure, including the access or maintenance road which runs underneath it. Our inventory shows that this corridor should be the boundary to the unit, except around Waypoint 9 where three active wells and an unreclaimed well pad intrude south into the unit—resulting in the boundary having to cut even further south. Finally, the BLM's desktop inventory shows Bonanza Road (CR 21) as the

northwestern boundary of the unit. However, there is an active rail line that runs up Rock Creek paralleling the east side of CR 21; this rail line is the northwest boundary of the LWC unit.

Even after incorporating the necessary boundary changes above, the Raven Ridge proposed LWC unit is 6,600 contiguous roadless acres of BLM managed land, thus meeting the size criteria for identifying LWCs.

II. Raven Ridge proposed LWC is primarily affected by the forces of nature.

Whether because of its overlap with the BLM's Raven Ridge *Area of Critical Environmental Concern* or because of its rugged topography of steep sandstone ridges divided by narrow draws, the Raven Ridge proposed LWC is almost devoid of human impacts and is in an entirely natural condition. Oil and gas activity is non-existent within the unit and very light on the periphery. Several historical wells are located along the southern borders of the unit; yet, excepting the well pad described above at Waypoint 3, these wells have been long abandoned (some as long as 50 years ago) and are no longer visible in any way to the casual observer. Along the northern boundaries of the unit, there are four active wells and several inactive wells and associated developments, all of which are outside of the unit boundaries of the unit and do not detract from the overall wilderness character of the unit.

III. Raven Ridge proposed LWC provides outstanding opportunities for solitude and primitive recreation.

Raven Ridge is a unique geological feature in the area with its severely tilted sedimentary rocks create long and narrow gulches and draws which provide for ample opportunities for solitude. These ridges and drainages are deep enough to provide screening from the only roads in the area that see any regular traffic—CR 21 and Hwy 64. If one is able to achieve the tops of the Raven Ridge escarpment, there are outstanding view north towards Bull Canyon and Willow Creek Wilderness Study Areas south of Dinosaur National Monument. The entire southwestern side of the unit is lightly visited; on our visit there in July we did not encounter a single vehicle or human being off of these two main thoroughfares.

The unique fossil resources, along with the regionally significant occurrences of rare plants provide outstanding opportunities for primitive and unconfined recreation. Bird watching, hiking, and hunting opportunities also exist. Hunting is popular and outstanding rock climbing opportunities exist on the numerous sharp fins and cockscomb ridges of Raven Ridge.

VIII. Raven Ridge proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen* found Raven Ridge proposed LWC to contain numerous supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. The area is home to eight endemic plant species, including the Graham's Penstemon (proposed threatened species under the Endangered Species Act) and the White River beardtongue (a candidate species). The WRFO's Draft Resource Management Plan and Environmental Impact Statement (WRFO RMP DEIS) from 1994 points out that "exposures of the Parachute Creek Member of the Green River Formation along Raven Ridge provide the only Colorado occurrences of five sensitive plant species, two of which are rare throughout their range of distribution. The other three are rare in Colorado but more common in the Uintah Basin of Utah" (WRFO RMP DEIS, p. 3-18). The WRFO Draft RMP and EIS for Oil and Gas

Development (2011) states that "the White River beardtongue (*Penstemon scariosus var. albifluvis*) is known to be within five locations on the WRFO. Three of these populations occur in the Raven Ridge ACEC. Threats include development of oil and gas and oil shale, recreational OHV use, livestock grazing and trampling by wildlife and livestock" (p. 3-79). According to Colorado Parks and Wildlife, in addition to the eight endemic plant species located in the area, Raven Ridge is also home to "one of the richest North American assemblages of insect fossils from the Eocene Period (approximately 37-57 million years ago). These rare plant species and paleontological resource enhance the wilderness experience and undoubtedly should be protected; such protection will also lessen the degrading effects of the threats the BLM recognizes, noted above.

Raven Ridge is also the location of important mule deer, antelope, white-tailed prairie dog and greater sage-grouse habitat and was the location of an effort by the USFWS and Colorado Division of Wildlife to reintroduce the black-footed ferret. The unit lies within the Dinosaur Lowland Master Leasing Plan area accepted by the BLM in 2011. Protecting the wilderness characteristics and roadless nature of this unit will help preserve these significant wildlife values, which also contribute to the outstanding recreational opportunities of these lands.

Summary Conclusion

Our extensive on-the-ground inventory of the Raven Ridge proposed LWC shows that the BLM was correct in identifying this area as one that could qualify as a Lands with Wilderness Characteristics—its naturalness and excellent opportunities for solitude and primitive recreation alone qualify the unit. The area's unique geology, populations of rare plants and important wildlife also contribute to the values of the area. However, the BLM's desktop inventory of the unit must be updated to reflect the conditions on the ground, and the BLM should conduct a full inventory of the area to document these conditions before making any land management decisions that may negatively affect these outstanding characteristics.

This report provides new information, including maps and photos, documenting that the 6,600 acre Raven Ridge unit meets wilderness criteria. This area deserves to be recognized as *Lands with Wilderness Characteristics* and its wilderness values protected.

Raven Ridge Photopoints

The following photographs correspond with the numbered icons on the attached Raven Ridge map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Raven (1) - N

Raven (2) – N

Raven (3) - NE

Raven (4) - E

Raven (5) - NE

Raven (6) - N

Raven (7) - WNW

Raven (8) - ESE

Raven (9) - SW

Raven (10) - WNW

Raven (11) - ESE

Raven (12) - SE

Raven (13) - ENE

Raven (14) - S

Raven (16) - Solitude

Raven (17) - Solitude

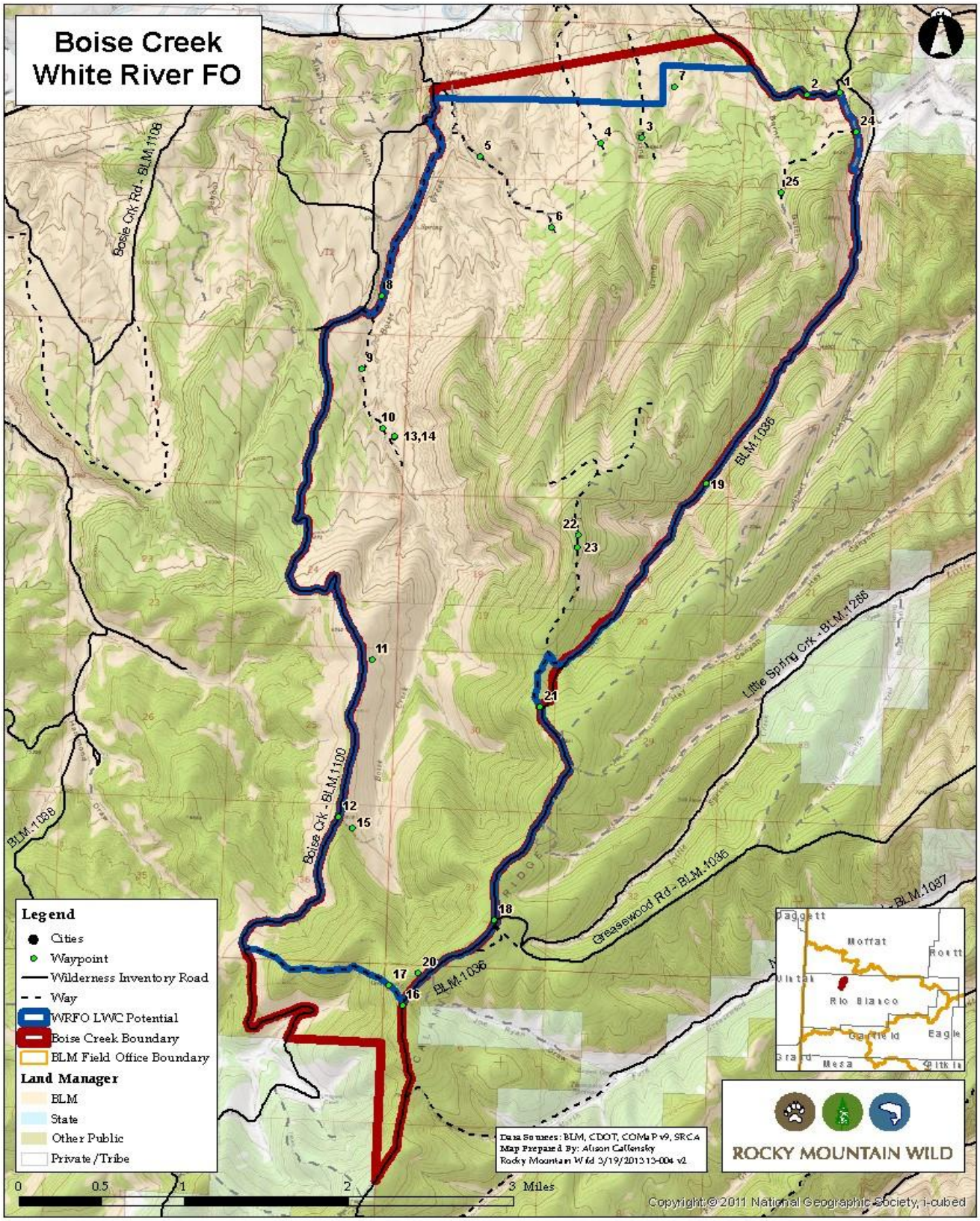
Raven (18) - Scenic

Raven (19) - Scenic

Lands with Wilderness Characteristics Recommendations: Boise Creek

Boise Creek. *Photo: Kurt Kunkle*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Boise Creek
White River FO
Boise Crk Rd - BLM 1108
Boise Crk - BLM 1100
BLM 1036
Little Spring Crk - BLM 1056
Greasewood Rd - BLM 1035
BLM 1037
BLM 1038
1
2
3
4
5
6
7
8
9
10
13,14
11
12
15
16
17
18
19
20
21
22
23
24
25
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Boise Creek Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private /Tribe
0
0.5
1
2
3 Miles
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 3/19/2013 13-004 v2
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
ROCKY MOUNTAIN WILD
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Overview and Boundary Delineation:

The Boise Creek proposed Lands with Wilderness Characteristics unit (LWC) is about 15 miles directly east of Rangely, Colorado, in Rio Blanco County. The 7,720-acre unit consists of a main drainage and a high ridge. Boise Creek proper drains off of Calamity Ridge and flows north into the Yampa River. Pinyon-juniper woodlands, grassy hills and brushlands dominate the unit. Mule deer can be found within the area. The Boise Creek unit is part of a complex of LWC units we are calling the Calamity Ridge complex, which includes Greasewood Gulch, Blair Mountain, Barcus Creek and Hammond Draw. The unit is bounded on the East by BLM road 1036, on the northwest by private property and the west by BLM Road 1100.

Boise Creek was identified by BLM's White River Field Office as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In their report, the BLM identified an area of 7,200 acres (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in their LWC inventory report contain several inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During the summer of 2012, Conservation Colorado visited the Boise Creek area to conduct an in-depth, on-the-ground field inventory of the Boise Creek LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this case, Conservation Colorado identified several adjustments that should be made to the BLM's proposed Boise Creek LWC boundary in order to bring it in line with the policies laid out in Manual 6310. Once these adjustments are made, a more complete picture of the area's outstanding wilderness character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary changes:

I. Boise Creek proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Boise Creek unit comprises a block of 7,720 acres of contiguous roadless acres. 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 road, 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). All Waypoints referred to in the narrative below can be seen in the attached photo sheet for Boise Creek.

Conservation Colorado made three adjustments to the BLM boundary - one on the north by moving the boundary from sub-section lines to a power line and one on the south by moving the BLM boundary from an old fence line to a vehicle route and private property. The third is a very small adjustment along the eastern boundary. Details on these adjustments are included below.

Beginning in the Northwest corner, Waypoints 1 shows the boundary as it follows BLM 1105. From 1105, the boundary follows the power line. Three 'ways' enter the unit along the northern boundary, shown in Waypoints 3, 4, 5 and 6. Routes in Waypoints 4 and 5 are not receiving any use and are recovering to a natural state. Waypoints 5 and 6 do see some use to access a stock pond, but it does not receive any maintenance. We agree with the BLM's assessment and have included all of these routes within the boundary.

The eastern boundary follows an unnamed BLM route shown in Waypoint 8, which is an unmaintained way. It makes sense to use this as a boundary because of several impacts between it and BLM road 1100. A short way enters the unit off of this route, seen in Waypoints 9 and 10. This way accesses a stock pond and has not been constructed or maintained. The remainder of the eastern boundary is BLM road 1100. BLM 1100 can be seen in Waypoints 11 and 12.

The southern boundary of the drawn by the BLM follows an old defunct fence line which traverses step slopes. It can be seen in Waypoints 16 and 17. We have redrawn the boundary to private lands and the end of BLM 1100.

The eastern boundary is defined by BLM road 1036, which can be seen in Waypoints 18 and 19. Two unnumbered routes enter the unit along the eastern boundary. Waypoints 21 and 22 show the first route which has been driven on (not construction, no maintenance) and Waypoints 24 and 25 show the second route (some old construction but no maintenance). There is a small boundary change at Waypoint 21 – here, we drew the boundary to follow 1036, where the BLM boundary follows the beginning of the unnumbered route. It then follows a very steep and badly eroding undrivable shortcut.

II. Boise Creek LWC is primarily affected by the forces of nature.

Boise Creek has been affected primarily by the forces of nature and all human impacts within the unit are substantially unnoticeable. Waypoints 2 and 7 show the lower northern portion of the unit; this area is characterized by the bottoms of several drainages, sage and grassy meadows, and wide open spaces. Waypoints 13 and 14 are along Boise Creek toward the bottom; they show the drainages and its characteristics in both directions. Waypoint 23 shows the stunning view from one of the several dominate ridges in the unit.

Conservation Colorado identified three stock ponds along the northeast portion of the unit (see Waypoint 10). Due to the low density of the ponds, they are considered substantially unnoticeable. The several ways within the unit do not impact the unit's naturalness due to vegetative screening and low density. No other human impacts were observed.

III. Boise Creek LWC provides outstanding opportunities for solitude and primitive recreation.

The Boise Creek unit is made up of the Boise Creek drainage and the High Calamity ridge as the main feathers. Spring and Burnt Gulches also make up part of the northern half of the unit. Waypoint 14 shows a lonely tree clearly experiencing outstanding solitude. Waypoint 15 shows Boise Creek flowing north out of the unit, inviting exploration and outstanding unconfined recreation. The various ridges and drainages in the unit provide great hiking and exploration opportunities. The person completing this inventory went on a great hike in the northern portion of the unit and he experienced outstanding opportunities for both solitude and unconfined recreation.

VIII. Boise Creek LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

The Boise Creek LWC as defined in this report has supplemental values. These values are briefly described here and need to be further researched. They include the values managed for in the Upper Greasewood Creek and Yanks Gulch Area of Critical Environmental Concern. The area is home to a diversity of wildlife habitat including but not limited to: bald eagle winter forage and winter range and greater sage-grouse production area, lek sites and historic range and overall habitats, as determined by Colorado Parks and Wildlife. Important elk and mule deer habitats can be found in the unit, including corridors, winter range, concentrations areas - again, determined by Colorado Parks and Wildlife.

The Colorado Natural Areas Program (CNAP) has identified several important biodiversity values including: Dudley Bluffs Rare Wildflowers, several Element Occurrence High Precision Communities: the Western Slope Grasslands and the Piceance Twinpod, Mesic Western Slope Pinyon-Juniper Woodlands and the many-stem Stickleaf. CNAP also identified Yanks Gulch Natural Area, and. As well as the following Potential conservation areas: Calamity Ridge and School Gulch.

Cultural, historic, geologic and spiritual values will need to be researched to gain a complete picture of Boise Creek's supplemental values.

Summary Conclusion

Our on-the-ground inventory of the Boise Creek unit shows that the BLM was correct in identifying this unit as having Lands with Wilderness Characteristics. The three boundary adjustments aid in making the unit compliant with current LWC inventory policy.

The Boise Creek unit is a unique area that is natural and provides solitude and primitive recreation. Taken in the context of the larger landscape that is experiencing pressure from drilling activity, protecting the LWC characteristics not only provides people with the opportunity to experience this naturally beautiful landscape on its own terms, but also helps maintain the ecological integrity of the region.

Our inventory has documented suggested boundaries as well as the wilderness characteristics located in the Boise Creek unit. It is imperative that the BLM give this unit a full inventory to document these and any additional outstanding wilderness characteristics before any land management decisions are made that might negatively affect these resources.

This overview provides new information, including maps and photos, documenting that the 7,720 acre Boise Creek unit meets wilderness criteria. This area deserves to be recognized as a Lands with Wilderness Characteristics unit and its wilderness values protected.

Boise Creek Photo Points

The following photographs correspond with the numbered icons on the attached Boise Creek unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Boise (1) - W

Boise (3) - S

Boise (4) - N

Boise (5) - S

Boise (6) - E

Boise (7) - S

Boise (8) - N

Boise (9) - S

Boise (10) - S

Boise (11) - S

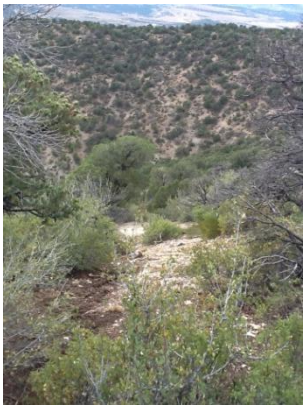
Boise (12) - SE

Boise (13) - S

Boise (14) - N

Boise (15) - N

Boise (16) - N



Boise (17) - W

Boise (18) - N

Boise (19) - S

Boise (20) - S

Boise (21) - N

Boise (22) - N

Boise (23) - SW

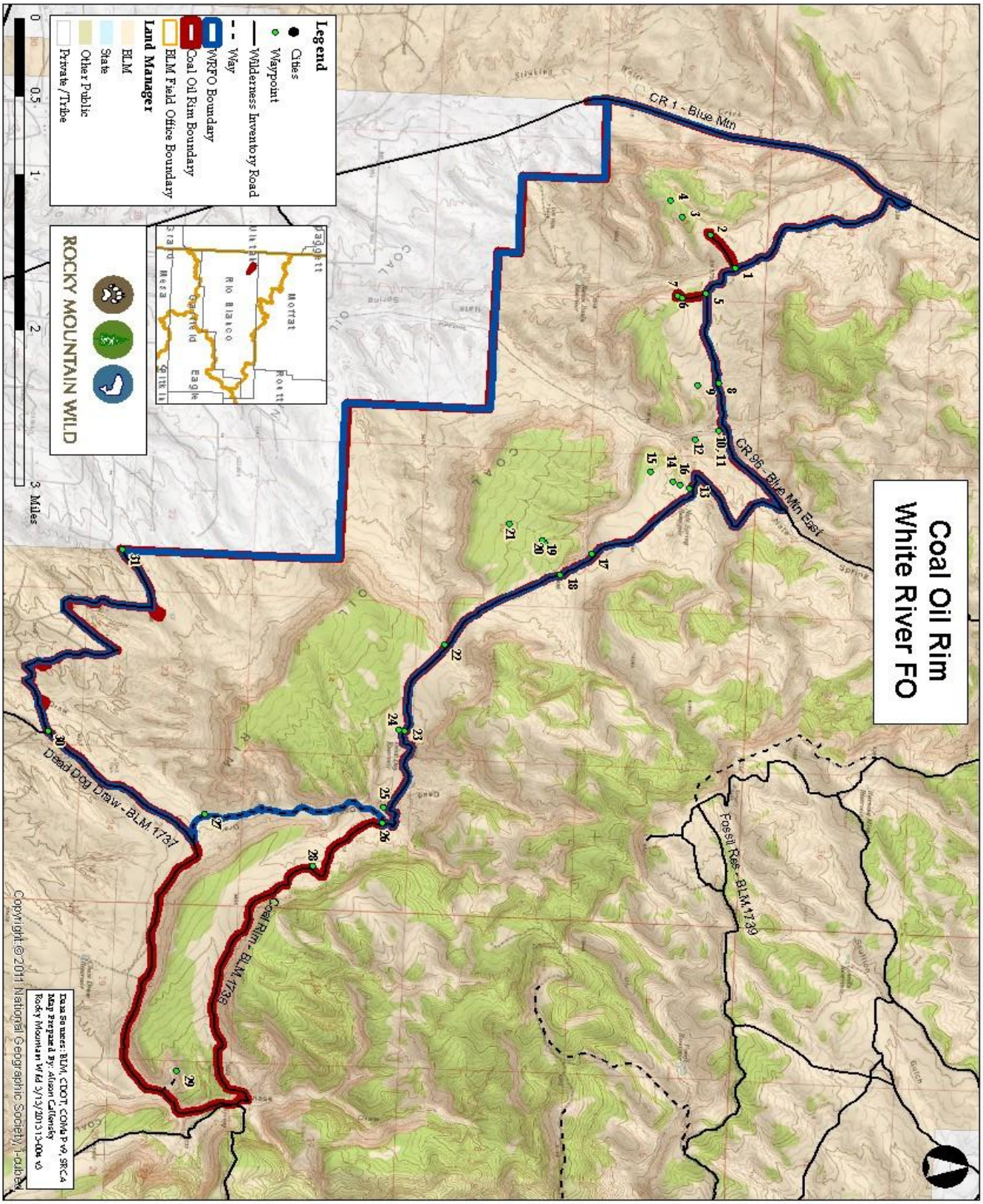
Boise (24) - W

Boise (25) - S

Lands with Wilderness Characteristics Recommendations: Coal Oil Rim

Dead Dog Draw, Coal Oil Rim, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Coal Oil Rim
White River FO
CR 1 - Blue Mtn
CR 96 - Blue Mtn East
Dead Dog Draw - BLM 1737
Coal Rim - BLM 1736
Fossil Res - BLM 1739
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO Boundary
Coal Oil Rim Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private /Tribe
ROCKY MOUNTAIN WILD
0
0.5
1
2
3 Miles
Data Sources: BLM, CDOT, CGMA P+O, SRC-A
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 3/13/2013-004 v3
Copyright © 2011 National Geographic Society, i-cubed

Overview and Boundary Delineation:

Coal Oil Rim is a remarkable series of sky islands rising above the White River north of Rangely, Colorado. The unit is made up of five distinct plateaus blanketed in healthy stands of pinyon and juniper. These forested mesas provided outstanding walking and hiking along gently sloping terrain leading to amazing views over Rangely towards Raven Ridge to the southwest, Shavetail Gulch and Texas Mountain to the south, and Big Ridge and the Cathedral Bluffs to the southeast.

Much of the Coal Oil Rim proposed Lands with Wilderness Character unit (LWC) has been protected since 1997 as an Area of Critical Environmental Concern (ACEC) in order to protect its "small aspen clones and other biologically diverse plant communities [and] riparian habitats" (White River Field Office Resource Management Plan and Record of Decision, 1997). Because of this fact, the area remains in an entirely natural state, with verdant mesas, colorful canyons, and very few roads or ways. Outstanding opportunities for solitude can be found among the dense stands of pinyon and juniper atop the sky islands where no roads intrude and where peace and quiet are the dominant attributes.

The 5,100-acre unit is bounded on the west by Rio Blanco County Road 1 (CR 1), on the north by Rio Blanco County Road 96 (CR 96) and BLM 1736, on the east by BLM 1737 in Dead Dog Draw, and on the south by private lands, oil and gas facility access roads, and BLM 1737. The unit lies entirely within Rio Blanco County.

Coal Oil Rim was identified by BLM's White River Field Office (WRFO) as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In the report, the BLM identified an area of 5,400 acres around Coal Oil Rim (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer that does not differentiate between those roads that qualify for Wilderness Inventory Roads under BLM Manual 6310 and those that do not. Therefore, the boundaries proposed by the BLM in the LWC inventory report contain small inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During August and September of 2012, The Wilderness Society visited the Coal Oil Rim area to conduct an in-depth, on-the-ground field inventory of the Coal Oil Rim LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Coal Oil Rim proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Coal Oil Rim unit comprises a block of 5,100 contiguous roadless acres. 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). Although our inventory of the area revealed that BLM's proposed boundaries for this unit largely mirror on-the-ground realities, we found that the eastern boundary that BLM has proposed for this unit does not meet the above criteria for a Wilderness Inventory Road and thus should be moved further east to roads or impacts that do meet the criteria. All photopoints referred to in the narrative can be seen in the attached photosheet for Coal Oil Rim.

In the northwestern corner of the unit, two routes depart CR 96 and head south to primitive campsites on or near the edge of Coal Oil Rim. At Waypoint 1, the westernmost of these routes appears to be maintained. The route is cut through the sagebrush and shows no significant vegetative growth in the median between the tracks. This route has a distinct change in character at Waypoint 2, where a rough primitive campsite exists that seems to be utilized with some regularity. Beyond Waypoint 2, the route is clearly non-maintained and does not meet the criteria for a WIR (Waypoint 3). At Waypoint 4, the route disappears entirely as it reaches a section of sandstone bed surface. If in fact this route is maintained using mechanical means, it only occurs as far as the campsite at Waypoint 2 and any cherrystem should end at this point.

The second of the routes in the northwest portion of the unit begins at Waypoint 5. Like the route to the west, this route appears to be maintained at its junction with CR 96 (Waypoint 5). The route leads through a rough, possibly non-maintained section at Waypoint 6 to a primitive campsite at an overlook along the top of Coal Oil Rim (Waypoint 7). Because this route has the purpose of leading to an excellent primitive campsite and appears to be maintained, this route should be included as a cherrystem and left out of the LWC unit.

At Waypoint 8, a user-created route attempts to reach the sandstone rim south of CR 96. This route shows no signs of construction using mechanical means, nor does it appear to be maintained. The route has no purpose as it fades out near Waypoint 9. This route does not qualify as a WIR and should be left in the unit.

A small pipeline travels north to south through the unit at Waypoint 10. It is unclear whether this pipeline is still functioning or whether it is associated with a right-of-way, as no producing oil and gas wells are found anywhere near this section of the unit. The road that parallels the pipeline is not maintained (Waypoint 11) and is impassable to vehicles after only one third of a mile. The road certainly does not qualify as a WIR and as such has been left in the unit.

Just to the east, a user-created route traverses the edge of the rim looking over the small gulch and way described in the paragraph above. Waypoint 12 shows the condition of this route near its terminus. This route was not constructed using mechanical means, is not maintained, and serves no known purpose.

Waypoints 14 and 15 show an unmaintained route which shows no signs of original construction using mechanical means, nor signs of ongoing maintenance. Further, the route was listed as closed on the Coal Oil Rim ACEC map included in the 1997 White River Resource Management Plan. Waypoint 18 shows a route also listed as closed on the ACEC map. This route is passable (Waypoint 18), but because it is signed as closed and listed as closed on the BLM road layer, no maintenance should be occurring (Waypoints 19 and 20); thus, this route should be left in the unit as a way as it does not qualify as a WIR.

At Waypoint 23, an overgrown and narrow pirate OHV track has been carved through the tall grass and sagebrush in a southerly direction. This route—also listed as closed on the BLM road layer—is obviously not maintained (Waypoint 24) and does not qualify as a WIR.

The BLM's desktop inventory proposed an eastern boundary for the Coal Oil Rim unit that traversed the bottom of Dead Dog Draw between BLM 1736 and BLM 1737 to the south. This boundary follows no visible on-the-ground feature (Waypoint 25) and traverses directly up a nearly 50-foot-high sandstone cliff (Waypoint 26). Because there is no road at all along this boundary, nor any other visible feature that could qualify as a WIR for boundary delineation, this eastern boundary should be deleted and moved further to the southeast to where BLM 1736 meets BLM 1737 and drops down off of the rim into Chase Draw.

As the boundary follows Chase Draw off of Coal Oil Rim and to the south, a very short route juts west to the site of an old well at Waypoint 29. Records show that this well was plugged and abandoned over 50 years ago and has seen no activity since that time. Although the route was passable, it shows no sign of maintenance. This route no longer has a purpose and does not qualify as a WIR.

Between Waypoints 30 and 31, the southern boundary of the proposed Coal Oil Rim LWC unit follows a series of BLM roads that provide access for several producing, and numerous non-producing, oil and gas well pads. Although the BLMs desktop inventory boundary left many of these pads in the unit, we have chosen to cut these impacts from the unit in order to include only lands that are natural in appearance in accordance with BLM Manual 6310.

After incorporating the small change listed above and shown on the attached map, the Coal Oil Rim unit contains 5,100 contiguous roadless acres of BLM lands and thus meets the size criterion as outlined in BLM Manual 6310.

II. Coal Oil Rim proposed LWC is primarily affected by the forces of nature.

Possibly due to the protections afforded this unit through its designation as an Area of Critical Environmental Concern, the area appears entirely natural and is affected solely by the forces of nature. The sky islands that make up the unit are devoid of roads, well pads, or other substantially noticeable features, while the narrow canyons between the mesas are affected by nothing other than the erosional forces brought on through natural weather events and seasonal cycles (Waypoint 22).

Below the unit and to the south, intensive oil and gas development occurs in the Rangely Oil Field. These impacts, while significant, are located outside of the unit. Because the majority of the unit is made up of the large sky islands that slope gently upward towards the south, any visitor to the majority of the unit can neither see nor hear the activity occurring in this area of industrial development to the south. Only when one approaches the rim of these mesas can one look down

below the unit and observe the oil and gas activity. The Rangely Oil Field does not impact the naturalness of the Coal Oil Rim unit as a whole.

III. Coal Oil Rim proposed LWC provides outstanding opportunities for solitude and primitive recreation.

The solitude that the casual visitor encounters within the Coal Oil Rim unit is outstanding. Although only a short drive from the town of Rangely, this area sees little visitation, as evidenced by the lack of trails, roads, ways, campsites or other noticeable human impacts within the unit. During neither of our visits to the area in 2012 did we encounter another human being, either within the unit or along the boundary roads. Each of the five mesas or sky islands that make up the unit are separated by canyons and gulches of varying depths and isolated from each other by steep sandstone cliffs (Waypoint 25). This fact creates a sense of solitude and means that while visitors are enjoying one segment of the unit, they are not impacting the solitude of visitors in another portion of the unit. Solitude is also easily found in the rugged canyons which separate the high mesas of the unit (Waypoint 16).

Opportunities for primitive and unconfined recreation are also found in Coal Oil Rim. The hiking is simply outstanding, with easy walking found on the gently uplifted slopes of the individual sky islands. A short ride on horseback could lead to the outstanding views along the rim overlooking the White River, and rock climbers could find an abundance of routes among the sandstone cliffs that line the high mesas (Waypoint 22). In fall, when the radiant red and yellow hues of the trees and shrubs along the canyon bottoms are contrasted with the tans and greys of the sandstone cliffs, photographic opportunities are particularly excellent (Waypoint 25). Coal Oil Rim provides both outstanding opportunities for solitude and primitive and unconfined recreation, and these opportunities should continue to be protected.

VIII. Coal Oil Rim proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen* found Coal Oil Rim proposed LWC to contain several supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. The area's unique pockets of aspen and other riparian habitats (Waypoint 17) have been recognized by BLM and are the reason much of the area was designated as an Area of Critical Area of Environmental Concern. The area contains significant wildlife resources including: active white-tailed prairie dog colonies; bald eagle forage areas; winter habitat for elk, mule deer, and antelope; and summer range for large mule deer. Coal Oil Rim is also within the Dinosaur Lowlands Master Leasing Plan area (MLP) that the BLM recognized and accepted in 2011.

Summary Conclusion

Our extensive on-the-ground inventory of the Coal Oil Rim unit shows that the BLM was correct in identifying this area as one that could qualify as Lands with Wilderness Characteristics. The boundaries created through the BLM's desktop inventory of potential LWCs is largely correct for this unit, except for the eastern boundary of the unit that should be expanded to the east. With a series of large sky islands or mesas making up the bulk of the 5,100 acre unit, Coal Oil Rim provides unique opportunities for solitude and primitive recreation. The fact that the unit has been protected as an ACEC since 1987 has contributed to keeping the area in a natural state, primarily affected by the forces of nature. The

rare and significant plant communities and biological habitats are a supplemental value whose protection would be ensured by meaningful protection as Lands with Wilderness Characteristics.

Our inventory has documented necessary boundary adjustments as well as the wilderness characteristics of the area. It is imperative that the BLM now do the same, before any land management decisions are made that might degrade these qualities

This overview provides new information, including maps and photos, documenting that the 5,100 acre Coal Oil Rim unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Coal Oil Rim Photopoints

The following photographs correspond with the numbered icons on the attached Coal Oil Rim unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Coal Oil Rim (1) - SW

Coal Oil Rim (2) - W

Coal Oil Rim (3) - N

Coal Oil Rim (4) - SW

Coal Oil Rim (5) - S

Coal Oil Rim (6) - N

Coal Oil Rim (7) - SE

Coal Oil Rim (9) - E

Coal Oil Rim (10) - NE

Coal Oil Rim (11) - S

Coal Oil Rim (12) - N

Coal Oil Rim (13) - S

Coal Oil Rim (14) - S

Coal Oil Rim (15) - S

Coal Oil Rim (16) - W

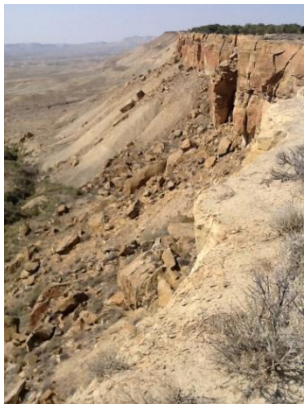
Coal Oil Rim (17) -S

Coal Oil Rim (18) - S

Coal Oil Rim (19) - S

Coal Oil Rim (20) - S

Coal Oil Rim (21) - S



Coal Oil Rim (22) - SW

Coal Oil Rim (23) - S

Coal Oil Rim (24) -W

Coal Oil Rim (25) -S

Coal Oil Rim (26) -S

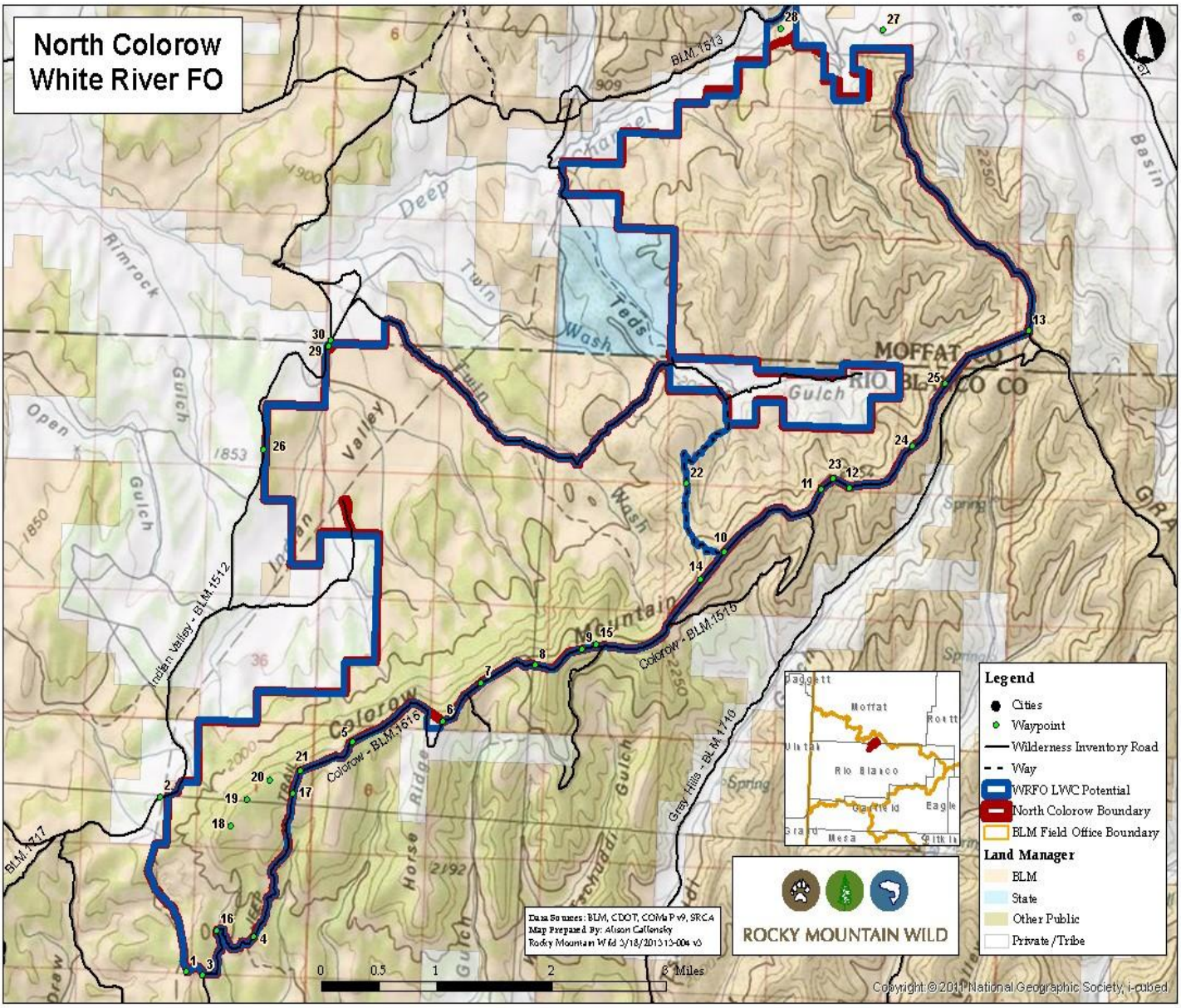
Coal Oil Rim (28) - SW

Coal Oil Rim (32) - Solitude

Lands with Wilderness Characteristics Recommendations: North Colorow

North Colorow. *Photo: Kurt Kunkle*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


North Colorow
White River FO
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
North Colorow 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 Caffensky
Rocky Mountain Wild 3/18/2013 13-004 v3
0 0.5 1 2 Miles
Copyright © 2011 National Geographic Society, i-cubed
Colorow - BLM 1616
Colorow - BLM 1515
Indian Valley - BLM 1512
Grey Hills - BLM 1740
BLM 1513
BLM 1517
MOFFAT CO
RIO BLANCO CO
Deep Twin Wash
Teds Wash
Twin Valley
Indian Valley
Rimrock
Open Gulch
Horse Ridge
Mountain
Spring
Basin

Overview and Boundary Delineation:

The North Colorow proposed Lands with Wilderness Characteristics unit (LWC) is about 20 miles northwest of Meeker, Colorado, in the Grey Hills on the county line between Moffat and Rio Blanco Counties. North Colorow is a northern extension of the Grey Hills and could be considered part of the larger Danforth Hills region. The unit consists of Colorow Mountain and Grey Hills, with the Teds Gulch Drainage and Twin Wash draining through the Indian Valley into Deep Channel Creek. The Indian Valley portion of the unit is wide open, grassy and brush-filled, and the uplands of Colorow Mountain and the Grey Hills are dotted with pinion-juniper woodlands. Golden eagles, white-tailed prairie dog and sage grouse can be observed among the wandering deer. The North Colorow is a combination of the Colorow Mountain and Grey Hills LWC units. The unit is bounded on the northeast by unnamed BLM roads, on the southeast by BLM road 1515, and on the northwest primarily by private property The 10,907 acre North Colorow unit is comprised of several drainages, including North Colorow, that begin on the Citadel Plateau and drain into Deep Channel Creek.

Colorow Mountain and Grey Hills were identified by BLM's White River Field Office as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In their report, the BLM identified an area of 6,000 acres for Colorow Mountain and 5,000 acres for Grey Hills (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in their LWC inventory report contain several inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During the summer of 2012, Conservation Colorado visited the North Colorow area to conduct an in-depth, on-the-ground field inventory of the North Colorow LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this case, Conservation Colorado identified several adjustments that should be made to the BLM's proposed North Colorow LWC boundary in order to bring it in line with the policies laid out in Manual 6310. Once these adjustments are made, a more complete picture of the area's outstanding wilderness character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary changes:

I. North Colorow proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The North Colorow unit comprises a block of 10,907 acres of contiguous roadless acres. 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 road, 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). All Waypoints referred to in the narrative below can be seen in the attached photo sheet for North Colorow.

Other than the combining of the units, Conservation Colorado found only minor boundary adjustments to BLM's desktop inventory. Beginning on the southwestern edge of the unit and briefly going north, Waypoints 1 and 2 show the pipeline that makes up the boundary. The southeastern boundary generally follows BLM route 1515, but there are several instances where 1515 leaves the ridge and the boundary follows the unnamed BLM route that continues along the ridge. The southeastern boundary is shown in Waypoints 3 through 13. At Waypoint 6, a small boundary adjustment was made so that the boundary follows the fence line route. A few old routes enter the unit from the southern boundary. Waypoints 17 through 21 show a series of ways that are included in both the BLM boundary and Conservations Colorado's boundary. The route at Waypoint 22 separated Colorow from Grey Hills because it is signed as closed, tank traps have been installed, and the route is revegetated; therefore, the route can be included in the boundary and the units can be combined. At Waypoints 23 and 24, short routes entering the unit have been signed as closed. Waypoint 25 shows a view of a route entering the unit from private property in Teds Gulch; BLM data shows this route as closed.

The northwestern boundary is largely drawn on private land. A Google Earth review shows two places at Waypoints 27 and 28 where the boundary should be adjusted to exclude lands that have been impacted by adjacent private activities. At Waypoint 27, the BLM may have an agriculture trespass issue where plowed fields may have encroached onto BLM land. Waypoint 29 is the Indian Valley Trailhead; the parking lot has been excluded from the unit.

II. North Colorow LWC is primarily affected by the forces of nature.

North Colorow has been affected primarily by the forces of nature and all human impacts within the unit are substantially unnoticeable. There are several closed vehicle routes within the unit that can be seen on Google Earth, but these routes do not impact the unit's naturalness. Waypoints 14, 15, 19 and 26 show the natural quality of the unit.

There are a few stock ponds that are well screened by vegetation and ridges, and are considered substantially unnoticeable. The closed routes within the unit are recovering to a natural state and are also considered substantially unnoticeable. No other human impacts were observed.

III. North Colorow LWC provides outstanding opportunities for solitude and primitive recreation.

The North Colorow unit is comprised of Colorow Mountain, Indian Valley and hill country north of Teds Gulch. Indian Valley, the hills north of Teds Gulch and the old routes depicted in Waypoints 17 through 21 provide outstanding

opportunities for primitive and unconfined recreation, as well as outstanding solitude. While exploring Indian Valley (with convenient parking at the trailhead) with the backdrop of Colorow Mountain and expansive views north to Pinto Gulch, one experiences an outstanding sense of solitude. Hiking and camping in the relatively unvisited hills north of Ted Gulch can be a challenging experience and provide excellent primitive recreation.

VIII. North Colorow LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

The North Colorow unit has supplemental values. The values discussed here are those related to the biological and wildlife values as identified by the Colorado Natural Areas Program and Colorado Parks and Wildlife. Values related to the history of the area or its cultural heritage or other potential values have not yet been researched. This research must be completed to gain a full understanding of the unit's supplemental values.

Colorado Parks and Wildlife has identified several important habitats that overlap with North Colorow. Greater Sage-grouse preliminary priority habitat, production area, brood area, historic habitat, and overall range are present. There is an active colony of white-tailed prairie dogs, and white-tailed prairie dog overall range habitat is also present. Black bear, elk and golden eagle are active in the area. Mule deer critical winter range, migration corridors, severe winter range and winter concentration areas overlap with the unit.

Summary Conclusion

Our on-the-ground inventory of the Colorow Mountain and Pinto Gulch units shows that the BLM was correct in identifying these places as having Lands with Wilderness Characteristics. The combination of the units provides an even more impressive LWC unit.

The North Colorow unit is a unique area that provides solitude and primitive recreation. Taken in the context of the larger landscape that is experiencing pressure from drilling activity, protecting the LWC characteristics not only provides people with the opportunity to experience this naturally beautiful landscape on its own terms, but also helps maintain the ecological integrity of the region.

Our inventory has documented suggested boundaries as well as the wilderness characteristics located in the North Colorow unit. It is imperative that the BLM give this unit a full inventory to document these and any additional outstanding wilderness characteristics before any land management decisions are made that might negatively affect these resources.

This overview provides new information, including maps and photos, documenting that the 10,907-acre North Colorow unit meets wilderness criteria. This area deserves to be recognized as a Lands with Wilderness Characteristics unit and its wilderness values protected.

North Colorow Photo Points

The following photographs correspond with the numbered icons on the attached North Colorow unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Colorow (1) - N

Colorow (2) - S

Colorow (3) - N

Colorow (4) - NE

Colorow (5) - NE

Colorow (6) - NW

Colorow (7) - NE

Colorow (8) - E

Colorow (9) - E

Colorow (10) - NE

Colorow (11) - NE

Colorow (12) - NW

Colorow (13) - NW

Colorow (14) - N

Colorow (15) - N

Colorow (16) - N

Colorow (17) - W

Colorow (18) - N

Colorow (19) - NE

Colorow (20) - NE

Colorow (21) - W

Colorow (23)- NW

Colorow (24) - NW

Colorow (25) - W

Colorow (26) - E

Colorow (29) - S

Colorow (30) - NE

Lands with Wilderness Characteristics Recommendations: Upper Coal Oil Rim

Upper Coal Oil Rim, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.

Overview and Boundary Delineation:

The proposed Upper Coal Oil Rim Lands with Wilderness Characteristics unit (LWC) is a rugged collection of staircase mesas, hidden draws, and deep and convoluted canyons. From one of the many vantage points along the upper reaches of the unit, one can look out over ridge after ridge of pinyon and juniper-covered hillsides interrupted by brief flats of large sagebrush. This is a unit to get lost in—boulder-strewn canyons lead to dryfalls and dead-ends, and the countless draws and cliff-topped slopes make every distance further than it appears. Because of its convoluted nature, Upper Coal Oil Rim has outstanding opportunities for solitude; a hiker or horseback rider is immediately swallowed by the landscape. The numerous drainages and densely forested hillsides deaden outside sounds and screen the visitor from activities beyond the unit.

Upper Coal Oil Rim is one of three adjacent proposed LWC units including Coal Oil Gulch and Coal Oil Rim. The area lies just north of Rangely, Colorado between Colorado State Highway 64 and US 40. The boundaries of the unit are formed by Rio Blanco County Road 96 to the west; BLM 1736 and BLM 1738 to the south; and Scullion Gulch, the Deserado Mine, and BLM 1739 to the north. The area has elevations between 5400 and 6500 feet, and lies entirely within Rio Blanco County.

Upper Coal Oil Rim was identified by BLM's White River Field Office (WRFO) as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In the report, the BLM identified an area of 9,000 acres around Upper Coal Oil Rim (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer that doesn't differentiate between those roads that qualify for Wilderness Inventory Roads under BLM Manual 6310 and those that do not. Therefore, the boundaries proposed by the BLM in the LWC inventory report contain small inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During August and September of 2012, The Wilderness Society visited the Upper Coal Oil Rim area to conduct an in-depth, on-the-ground field inventory of the Upper Coal Oil Rim LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made. Our findings are detailed below along with suggested boundary adjustments.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Upper Coal Oil Rim proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Upper Coal Oil Rim unit comprises a block of 10,400 contiguous roadless acres. 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). Our inventory of the area revealed that in several cases along the northern and eastern boundaries, the BLM's proposed boundaries for this unit do not meet the above criteria for WIRs and as such need to be modified; our proposed modifications are detailed below. All photopoints referred to in the narrative can be seen in the attached photosheet for Upper Coal Oil Rim.

Waypoint 2 marks the intersection of BLM roads 1735, 1736 and 1737. At this point, BLM 1736 travels directly up hill and to the northeast. It is unclear whether this route was ever originally constructed using mechanical means. As seen in Waypoint 2, the route shows no signs of cutting or blading and seems to be a hill-climb created by use. By Waypoint 4, BLM 1736 is clearly not maintained; large shrubs clog the route and large boulders have rolled down the steep slopes and into the sandy track (Waypoint 4). Further north, at Waypoint 5, the route passes through a burn area. The route here continues to be overgrown and sees little to no use. At this point, the route switchbacks underneath and around a steep slope; however, the BLM boundary does not follow this switchback and instead cuts directly up the steep slope where no route or road presently exists. The switchback itself is completely impassable to passenger vehicles, as gigantic boulders have slid down the slope and onto the old road bed (Waypoint 7). This route is clearly not maintained to ensure regular and continuous use; the only path through the area is via a small foot or cattle singletrack (Waypoint 8). This unmaintained switchback meets the BLM boundary again at Waypoint 9; again, the route here is overgrown, nearly entirely reclaimed by natural processes and does not meet the criteria of a WIR. Waypoint 10 shows the terminus of BLM 1736 near its intersection with the Deserado Mine access road; even on this northern end the route is obviously unmaintained. BLM 1736, north of its intersection with BLM 1738, does not meet the criteria for a WIR as it is not maintained and impassable to vehicles. Thus, the boundary following this route should be moved east to BLM 1738 (see map).

Because BLM 1736 between Waypoints 3 and 10 is clearly not maintained and does not meet the criteria for a WIR, we have opted to move the boundary east to BLM 1738. It is unclear whether BLM 1738 receives regular maintenance beyond the communications facility located near its eastern starting point on CR 65. However, the route does provide a means of accessing the Upper Coal Oil Rim unit's upper reaches (although in 2012 it was impassable to most passenger vehicles). Although there are no roads or other qualifying boundary features at the bottom of Scullion Gulch, we have opted to draw the boundary up this gulch in order to avoid the Deserado Mine facilities located at Waypoint 15.

At Waypoint 18, the BLM's desktop inventory boundary for this unit heads northeast, following no visible road or other qualifying feature (Waypoint 18). However, in order to do so, it crosses BLM 1739, which travels across the highest elevations of Upper Coal Oil Rim from CR 65 in the east to CR 96 in the west. BLM 1739 appears to be maintained

(Waypoint 19) all the way through (Waypoint 39) to its intersection with CR 96 (just south of Waypoint 38). Except for one area where a maintained road leads to an array of communications towers at Waypoint 35, BLM 1739 should be the northern boundary of the Upper Coal Oil Rim unit.

Between waypoints 37 and 38, the BLM's desktop inventory boundary departs the maintained BLM 1739 road and parallels it just to the west for about one mile. This section of the boundary follows no visible road or other qualifying boundary feature; it could be that this boundary was drawn here because of a faulty GIS road layer. Whatever the reason, the boundary should be moved back to the east to BLM 1739.

After incorporating the small change listed above and shown on the attached map, the Upper Coal Oil Rim unit contains 10,400 contiguous roadless acres of BLM lands and thus meets the size criterion as outlined in BLM Manual 6310.

II. Upper Coal Oil Rim proposed LWC is primarily affected by the forces of nature.

To the casual visitor, Upper Coal Oil Rim appears entirely natural and affected only by the forces of nature. Human impacts within the unit are minor—primarily consisting of small sections of cattle fencing and a number of deteriorating and rarely used vehicle routes. The vehicle routes are generally limited to the northern reaches of the unit near BLM 1739. The most prominent of these routes are BLM 1736 (described above) and a 3.5 mile route that connects BLM 1739 (near the silted-in stock pond labeled Fossil Reservoir on the map) to BLM 1736 east of Waypoint 33. This latter route begins in the north at Waypoint 22 and traverses southwest and then directly east through Waypoint 33. While the route was originally constructed using mechanical means (Waypoint 23), at least down to Fossil Reservoir, it shows no signs of regular maintenance or construction beyond this point (Waypoint 26, Waypoint 29, Waypoint 33). Further along this route, more evidence that the route is not maintained is visible (Waypoint 24 and Waypoint 27). At Waypoint 29, the route splits into two. One route heads west towards a lookout point at Waypoint 31 and is not maintained and is generally impassable to vehicles (Waypoint 30). The left spur heads east and is overgrown and unmaintained (Waypoint 32 and Waypoint 33). Besides not qualifying as Wilderness Inventory Roads for boundary delineation purposes, these routes are so overgrown, eroded, and deteriorated that their impact on the apparent naturalness of the unit as a whole is minor. In some places these routes are nearly invisible to somebody standing directly over them (Waypoint 32, Waypoint 26), and in other places the routes are screened by steep roadside slopes or large pinyon and juniper trees (Waypoint 34, Waypoint 29). Presently, these routes have no impact on naturalness; within a few more years of natural rehabilitation, many of them will be obliterated from the landscape entirely.

Elsewhere in the more than 10,000-acre unit, these types of vehicle routes are non-existent and the landscape is unimpeded by human impacts of any kind. The Upper Coal Oil Rim unit as a whole is primarily affected by the forces of nature and appears natural to the casual visitor.

III. Upper Coal Oil Rim proposed LWC provides outstanding opportunities for solitude and primitive recreation.

It doesn't take much effort to find solitude in Upper Coal Oil Rim. The terrain undulates and swells into numerous small drainages, deep canyons and hidden breaks. Trails are limited and visitation is low, so only a short hike or ride will provide the casual visitor with an immense perception of solitude and isolation. In the deeper canyons such as Chase Draw and Dead Dog Draw, steep canyon walls isolate the visitor and enhance a feeling of aloneness and wild isolation

(Waypoint 6, Waypoint 36). On the middle levels of the unit, healthy and dense forests of pinyon and juniper provide the visitor with outstanding opportunities to escape and experience these ecological communities as the Native Americans and original settlers once did (Waypoint 43). In our three visits to the area during August and September of 2012, we did not encounter another human being either within the unit or along any of its boundary roads; the area is truly one of profound solitude.

In addition to the opportunities for solitude in the unit, Upper Coal Oil Rim offers outstanding opportunities for primitive and unconfined recreation. Along the southeastern boundary of the unit, one can sit for hours with a pair of binoculars, and watch raptors such as golden eagles, bald eagles, peregrine falcons and ospreys work the thermals or scan the riparian zones along the White River for a meal. The lack of formal trails or other infrastructure allows for challenging hiking and backpacking opportunities in a primitive setting. And with the surface of the surrounding terrain dropping off quickly below Upper Coal Oil Rim on three sides (north, east, and south), revealing remarkable views, the photography opportunities are unlimited.

VIII. Upper Coal Oil Rim proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found Upper Coal Oil Rim proposed LWC to contain several supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. Because of the unit's topographic prominence and proximity to the White River, numerous golden eagles nest sites are found throughout the unit. The entirety of the unit is also classified by Colorado Parks and Wildlife as an elk winter concentration area and a small section of the unit overlaps with an active white-tailed prairie dog colony—a mammal that is found in only around 8 percent of its historic habitat. The southwestern portion of Upper Coal Oil Rim overlaps with the BLM-designated Coal Oil Rim Area of Critical Environmental Concern—an area with enhanced protections in order to preserve its uniquely diverse plant communities and riparian habitats. Upper Coal Oil Rim is also entirely within the Dinosaur Lowlands Master Leasing Plan area (MLP) that the BLM recognized and accepted in 2011.

Summary Conclusion

Our extensive on-the-ground inventory of the Upper Coal Oil Rim unit shows that the BLM was correct in identifying this area as one that could qualify as Lands with Wilderness Characteristics. The boundaries created through the BLM's desktop inventory of potential LWCs is largely correct for this unit. The one exception is along the eastern boundary of the unit, where a boundary was drawn along BLM 1736—an unmaintained and rarely used route that no longer qualifies as a Wilderness Inventory Route for LWC boundary delineation purposes. Two additional boundary changes are proposed for the northern boundary of the unit. With its relatively large size, lack of significant human impacts, and convoluted topography, Upper Coal Oil Rim has apparent naturalness and outstanding opportunities for both solitude and primitive and unconfined recreation.

Our inventory has documented necessary boundary adjustments as well as the wilderness characteristics of the area. It is imperative that the BLM now do the same, before any land management decisions are made that might degrade these qualities

This overview provides new information, including maps and photos, documenting that the 10,400 acre Upper Coal Oil Rim unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Upper Coal Oil Rim Photopoints

The following photographs correspond with the numbered icons on the attached Upper Coal Oil Rim unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Upper Coal Oil Rim (2) - NE

Upper Coal Oil Rim (4) - NE

Upper Coal Oil Rim (5) - SW

Upper Coal Oil Rim (6) - NW

Upper Coal Oil Rim (7) - SW

Upper Coal Oil Rim (8) - SW

Upper Coal Oil Rim (9) - E

Upper Coal Oil Rim (10) - SSW

Upper Coal Oil Rim (11) - N

Upper Coal Oil Rim (18) - SE

Upper Coal Oil Rim (19) - SW

Upper Coal Oil Rim (20) - SSE

Upper Coal Oil Rim (21) - SW

Upper Coal Oil Rim (22) - E

Upper Coal Oil Rim (23) - WNW

Upper Coal Oil Rim (24) - NE

Upper Coal Oil Rim (26) - SE

Upper Coal Oil Rim (27) - SW

Upper Coal Oil Rim (29) - SW

Upper Coal Oil Rim (30) - NW

Upper Coal Oil Rim (31) - SE

Shavetail (32) - WNW

Upper Coal Oil Rim (33) - W

Upper Coal Oil Rim (34) -S

Upper Coal Oil Rim (35) - NE

Upper Coal Oil Rim (36) - SSW

Upper Coal Oil Rim (39) - NW

Upper Coal Oil Rim (40) - WSW

Upper Coal Oil Rim (41) - SSW

Upper Coal Oil Rim (42) - SW

Upper Coal Oil Rim (43) - S

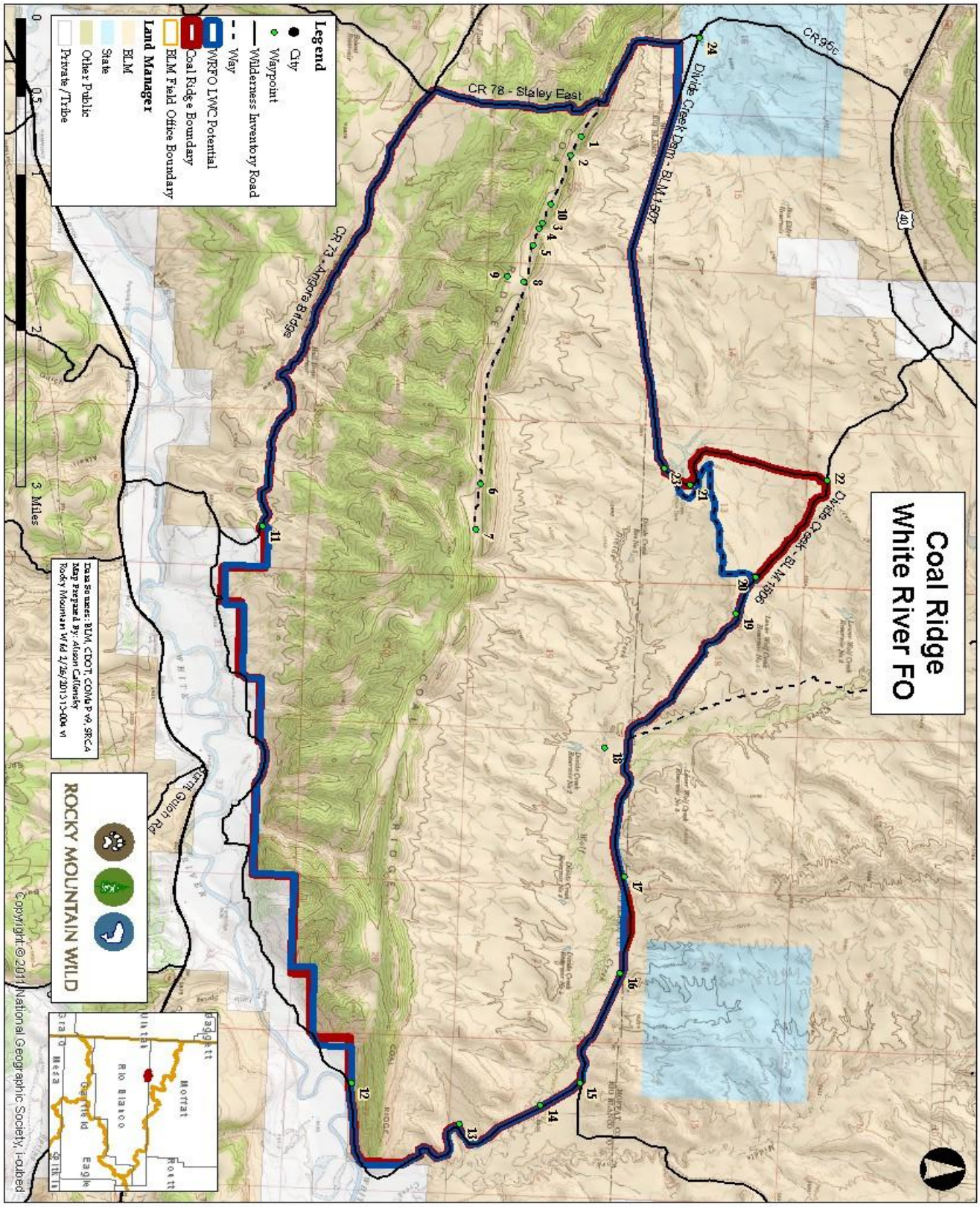
Upper Coal Oil Rim (44) - SW

Upper Coal Oil Rim (45) - SW

Lands with Wilderness Characteristics Recommendations: Coal Ridge

Coal Ridge, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Coal Ridge
White River FO
Legend
City
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Coal Ridge Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
CR 78 - Staley East
Divide Creek Dam - BLM 1507
Divide Creek - BLM 1505
CR 73 - Argenta Bridge
CR 95c
Data Sources: BLM, CDOT, COMaP v9, SRC4
Map Prepared by: Alison Gallowsky
Rocky Mountain Wild 1/26/2011 3:04 pm
0 0.5 1 2 3 Miles
ROCKY MOUNTAIN WILD
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Overview and Boundary Delineation:

Coal Ridge proposed Lands with Wilderness Characteristics (LWC) unit is a 9,300-acre unit made up of a long east to west running ridge paralleling the White River between Meeker and Rangely, Colorado. The unit's north side is defined by a dramatic tilted reef overlooking the saltbush and sagebrush of Lower Wolf Creek. On its south side, Coal Ridge is split by numerous narrow escarpments cloaked in pinyon and juniper leading down to the banks of the White River.

Coal Ridge is a conglomeration of multiple important wildlife habitats. All three of the cornerstone big game species (elk, mule deer, and pronghorn) utilize the area. Because of its proximity to the White River and dense prairie dog colonies, multiple birds of prey can be spotted within the unit, including bald and golden eagles, burrowing owls, red-tailed hawks, northern harriers, and ferruginous hawks. Coal Ridge is also the site of attempted reintroductions of the extremely rare black-footed ferret, and greater sage-grouse leks can be found on the north side of Coal Ridge.

Recreational opportunities at Coal Ridge include wildlife viewing, hunting, geologic interpretation, horseback riding and hiking. Outstanding opportunities for solitude can be found along the high rim and in the narrow gulches along the southern aspects of the unit.

The unit's boundaries are made up by County Road 78 on the west, County Road 73 and private land on the south and east, and BLM 1506 and 1507 on the north. The unit sits at elevations between 6200' atop the ridge to 5500' near Divide Creek.

Coal Ridge was identified by BLM's White River Field Office as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In the report, the BLM identified an area of 9,100 acres around Coal Ridge (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in the LWC inventory report contain small inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During May and July of 2012, The Wilderness Society visited the Coal Ridge area to conduct an in-depth, on-the-ground field inventory of the Coal Ridge LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this particular case, the boundaries identified by the BLM appear to be largely accurate for this potential LWC unit. TWS proposes one minor boundary adjustment in order to bring this unit's boundaries in line with the policies laid out in Manual 6310. Once these adjustments are made, a more complete picture of the area's outstanding wilderness

character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Coal Ridge proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Coal Ridge unit comprises a block of 9,300 contiguous roadless acres. 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). In a few cases, the boundaries BLM has proposed for Coal Ridge 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 Coal Ridge.

The Wilderness Society has found that the BLM's desktop inventory boundary for the Coal Ridge unit largely mirrors the on-the-ground situation and thus our recommended boundary adjustments for this unit are relatively minor. However, there is one boundary change and one intrusive route worth mentioning in detail, which we've done below.

Waypoints 1 through 7 are taken along BLM 1074, which traverses between two steep ridges into the center of the Coal Ridge LWC unit. Waypoint 1 shows that BLM 1074 was originally constructed using mechanical means (bladed). The route at its onset here on the western side of the unit is passable, but is deeply entrenched and eroded after less than one quarter of a mile into the unit (Waypoint 1). After less than one half of a mile, the only tread visible in the route was a single-file cattle path (Waypoint 3). At one mile in, the route still shows signs of mechanical blading. However, it is unclear whether this blading was done recently or was simply a result of the original construction; the route here is grown over with grasses and occasional shrubs and the surface is very uneven and rough (Waypoint 5). By Waypoint 7, the route is impassable to most motor vehicles because of very loose, sandy soils on the road bed. The only sign of use after this point is the cattle path. It is unclear whether or not BLM 1074 is regularly maintained using mechanical means to ensure relatively continuous use. The original purpose of this route may have been to provide access to the antiquated water impoundment structure near Waypoint 7; however, we did not see any evidence of recent vehicle travel on this route in either May or July of 2012. For this route, we agree with the BLM's desktop inventory. BLM 1074 does not meet the criteria of a WIR and should be left out of the unit.

The BLM's desktop boundary follows the Rio Blanco/Moffat County line between Waypoints 16 and 17, and should instead follow the road. At Waypoint 18, an unmaintained route heads west towards the sediment-filled and non-functioning "reservoirs" along Divide Creek. This route had not seen any recent use during our visits in 2012 and does not appear to be regularly maintained, possibly because of the apparent non-functionality of the impoundments.

At Waypoint 20, the BLM's desktop inventory boundary cuts south and west off of Divide Creek Road (BLM 1506) and towards Divide Creek Detention Dam. This route shows no signs of use and is overgrown with mature sagebrush in spots. This boundary segment should be moved north to follow BLM 1507 and 1506, as seen in the map.

After incorporating the small change listed above and shown on the attached map, the Coal Ridge unit contains 9,300 contiguous roadless acres of BLM lands and thus meets the size criterion as outlined in BLM Manual 6310.

II. Coal Ridge proposed LWC is primarily affected by the forces of nature.

The lack of oil and gas facilities within or in the vicinity of this unit is a unique feature and is likely one reason the area retains its naturalness and is primarily affected by the forces of nature. Only three oil and gas wells are found near the unit, and all three are plugged and abandoned wells with reclaimed well pads.

The Coal Ridge unit contains numerous small water impoundments that were built as early as the 1930s to control erosion of the fragile soils and to diminish downstream sediment and salinity loads in the White River. While numerous, these structures are generally natural in appearance, have in many cases been reclaimed through natural weather processes, and are difficult to distinguish, even when standing right on top of them. The impoundments are isolated to the northern portions of the unit in the feeder drainages above Wolf and Divide Creeks and most do not have existing vehicle access. The largest of these impoundments—the Divide Creek Detention Dam—is almost entirely filled in with sediment, yet still supports a small and overgrown riparian area popular with wildlife. Collectively, these structures do not have a detrimental impact on the naturalness of the unit as a whole.

The Coal Ridge unit is primarily affected by the forces of nature, and contains only minor human impacts. These impacts do not affect the area's overall naturalness, either individually or cumulatively.

III. Coal Ridge proposed LWC provides outstanding opportunities for solitude and primitive recreation.

There are two sides to Coal Ridge which provide two distinct experiences. On the north, Coal Ridge is defined by the saltbush badlands surrounding the important riparian areas of Wolf and Divide Creeks (Waypoint 30). Because of the wide-open topography and gentle grade (Waypoints 25 and 19), this part of the unit contains outstanding opportunities for primitive and unconfined recreation, primarily in the form of horseback riding, hiking, bird-watching, and small-game hunting. To the south, Coal Ridge proper is comprised of deep escarpments bounded by high titled slopes (Waypoint 28 and 29). From the highest points of Coal Ridge, beautiful pinyon- and juniper-lined valleys drain north to the White River (Waypoint 31), providing outstanding opportunities for solitude, as both the vegetation and topography provide screening from any nearby sights and sounds (Waypoint 27).

VIII. Coal Ridge proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found Coal Ridge proposed LWC to contain numerous supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. Much of the Coal Ridge unit lies within the White River Field Office's (WRFO) Wolf Creek Ferret Management Area (Wolf Creek MA). The Wolf Creek MA was delineated as part of the WRFO's Resource Management Plan in 1997 and is the site of extensive efforts to

reestablish the black-footed ferret in Colorado. The black-footed ferret is possibly the rarest mammal in North America and one of the rarest mammals in the world; it was one of the first species offered protection under the Endangered Species Act of 1973. The Wolf Creek MA was chosen as a location for black-footed ferret reintroductions for several reasons which coincide with its wilderness character, including its current land-use practices, the fact that "it has little ongoing or prospective mineral development", and its healthy white-tailed prairie dog colonies (*A Cooperative Plan for Black-Footed Ferret Reintroduction and Management,* 2001). Over 4,000 acres of black-footed ferret release sites exist within the Coal Ridge unit itself.

In addition to providing likely the most important habitat for black-footed ferrets remaining in Colorado, Coal Ridge is also the site of important habitat for the ESA-candidate greater-sage grouse, including leks sites, winter habitat, production areas, and around 4,600 acres of Preliminary General Habitat (PGH) as defined by Colorado Parks and Wildlife. Coal Ridge is also utilized by elk, mule deer, and pronghorn. The area is used heavily by elk in winter and spring, and acts as a migration corridor for both elk and mule deer coming north out of the White River drainage. Raptors are unusually common in the area, with prairie falcons, red-tailed hawks, burrowing and great horned owls, and northern harriers all utilizing the area. Many ferruginous hawk nest sites are found along Coal Ridge along with nest sites for both bald and golden eagles. The area's wildlife resources are truly abundant; protecting the wilderness character of this area will undoubtedly help preserve these sensitive resources into the future.

Summary Conclusion

Our extensive on-the-ground inventory of the Coal Ridge unit shows that the BLM was correct in identifying this area as one that could qualify as Lands with Wilderness Characteristics. Except for one minor change in the northern portion of the unit, the boundaries identified in the BLM's desktop inventory were largely correct.

Despite a size of less than 10,000 acres, the Coal Ridge unit contains a wide variety of wildlife habitats, making it a unique region in the White River Field Office. The fact that elk, mule deer, pronghorn, ferruginous hawks, white-tailed prairie dogs, eagles, falcons, greater sage-grouse and the black-footed ferret—the rarest mammal in North America—all have important habitat here shows that Coal Ridge is primarily affected by the forces of nature and retains its naturalness. These amazing wildlife resources also provide outstanding wildlife viewing and hunting opportunities along with other types of primitive and unconfined recreation. Our inventory has documented necessary boundary adjustments as well as the wilderness characteristics of the area. It is imperative that the BLM now do the same, before any land management decisions are made that might degrade these qualities

This overview provides new information, including maps and photos, documenting that the 9,300-acre Coal Ridge unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Coal Ridge Photopoints

The following photographs correspond with the numbered icons on the attached Coal Ridge unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Coal Ridge (1) - E

Coal Ridge (2) - NW

Coal Ridge (3) - E

Coal Ridge (4) - N

Coal Ridge (5) - E

Coal Ridge (6) - E

Coal Ridge (7) - E

Coal Ridge (8) - S

Coal Ridge (9) - S

Coal Ridge (14) - SSE

Coal Ridge (15) - SSE

Coal Ridge (18) - S

Coal Ridge (19) - S

Coal Ridge (20) - SW

Coal Ridge (22) - SW

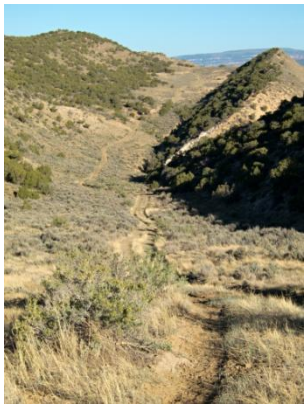
Coal Ridge (23) - S

Coal Ridge (24) - E

Coal Ridge (25) – Unconfined Rec.

Coal Ridge (26) - Scenic

Coal Ridge (27) - Scenic



Coal Ridge (28) - Scenic

Coal Ridge (29) - Solitude

Coal Ridge (30) – Unconfined Rec.

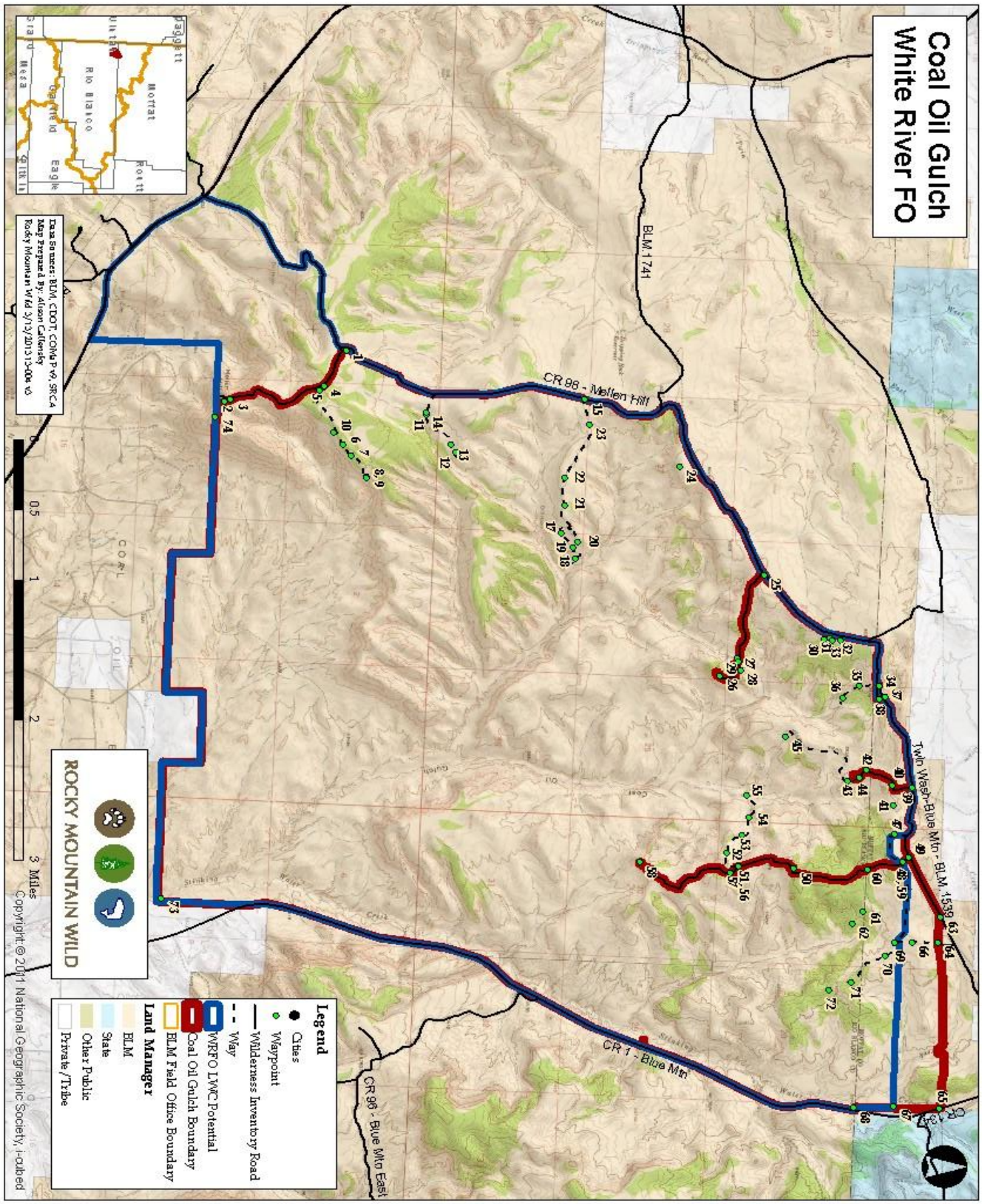
Coal Ridge (31) - Solitude

Coal Ridge (32) - Scenic

Lands with Wilderness Characteristics Recommendations: Coal Oil Gulch

Coal Oil Gulch, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Coal Oil Gulch
White River FO
BLM 1741
CR 98 - Melten Hill
Twin Wash-Blue Mtn - BLM 1539
CR 1 - Blue Mtn
CR 98 - Blue Mtn East
Data Sources: BLM, CDOT, COMap PyG, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 3/13/2013-004 v3
Moffat
Routt
Rio Blanco
Garfield
Eagle
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Coal Oil Gulch Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
ROCKY MOUNTAIN WILD
0 0.5 1 2 3 Miles
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Overview and Boundary Delineation:

Above the oil fields and neighborhoods of Rangely, Colorado lies a broad plateau that has been eroded into several interlocking canyons and gulches, much like the veins of a leaf. Above these gulches, elk and mule deer winter among the high sage, and, in summer, healthy pinyon and juniper forests make even short hikes seem like remote adventures. Below the mesas, one can encounter deep arroyos and hidden alcoves where outstanding campsites sit beneath colorful shale cliffs.

The Coal Oil Gulch proposed Lands with Wilderness Characteristics (LWC) is a 12,400-acre unit about halfway between Rangely and Dinosaur, Colorado. The unit is bounded by Rio Blanco County Road 98 (CR 98) on the west, BLM 1539 and a transmission line corridor on the north, Rio Blanco CR 1 and state and private lands on the east, and private lands and the Rangely Oil Field to the south. The unit lies primarily within Rio Blanco County with a small portion in the northern reaches of the unit lying within Moffat County.

Because of the broken topography and variety of vegetations, Coal Oil Gulch provides outstanding opportunities for solitude. This is a place where visitors can go to escape the sights and sounds of nearby industrial-scale oil and gas development. Camping, hiking, bird-watching, hunting and geocaching all occur within this unit, and opportunities for other types of primitive recreation, including rock climbing also exist.

Coal Oil Gulch was identified by BLM's White River Field Office (WRFO) as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In the report, the BLM identified an area of 13,100 acres around Coal Oil Gulch (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer that doesn't differentiate between those roads that qualify for Wilderness Inventory Roads under BLM Manual 6310 and those that do not. Therefore, the boundaries proposed by the BLM in the LWC inventory report contain small inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During September of 2012, The Wilderness Society visited the Coal Oil Gulch area to conduct an in-depth, on-the-ground field inventory of the Coal Oil Gulch LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this particular case, the boundaries identified by the BLM appear to be largely accurate for this potential LWC unit. TWS proposes small boundary adjustments in the north and southwest of the unit in order to bring this unit's boundaries in line with the policies laid out in Manual 6310; these changes actually decrease the size of the unit from the BLM's 13,100 acres to a more accurate 12,400 acres. Once these adjustments are made, a more complete picture of

the area's outstanding wilderness character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Coal Oil Gulch proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Coal Oil Gulch unit comprises a block of 12,400 contiguous roadless acres. 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). Although our inventory of the area revealed that BLM's proposed boundaries for this unit largely mirror on-the-ground realities, in one instance we found that the boundary BLM has proposed for this unit does not meet the above criteria for a Wilderness Inventory Road and thus should be moved to roads or impacts that do meet the criteria. Also, in the southwest corner of the unit, BLM's boundary failed to account for the graded and maintained road leading up to the communications towers atop Mellen Hill. Finally, short routes were cherrystemmed into the unit as they appear to meet the criteria for WIRs. All photopoints referred to in the narrative can be seen in the attached photosheet for Coal Oil Gulch.

In the southwest corner of the unit, the BLM's desktop inventory boundary followed Rio Blanco County Road 98 south and west to its intersection with Highway 64. However, at Waypoint 1, Rio Blanco CR 98A cuts east and south into the unit and leads up to the array of communications facilities on top of Mellen Hill (Waypoint 2). Besides being listed as a County Road, this route is regularly maintained and leads to substantially noticeable human impact; as such, the route, facilities, and section of the unit to the southwest have been removed from our proposed LWC.

Along CR 98A, a short spur route leads northeast along a steep cliff overlooking southern Coal Oil Gulch. As seen in Waypoints 4 through 8, this route does see some use by OHVs; however, while the route may have been originally constructed using mechanical means at the start of the route (Waypoint 4), it shows no signs of ongoing maintenance using mechanical means to ensure regular and continuous use. By Waypoint 5 the route is deteriorating and seems to be maintained solely by the passage of vehicles. At Waypoint 6, large shrubs and plants can be seen growing in the median between the two tracks, and at Waypoints 7 and 8 the route shows no signs of construction or maintenance, although vehicles are occasionally passing through cross-country to reach the cliff rim. This route does not meet the criteria of a WIR and should be left out of the unit.

Further north, at Waypoint 11, a BLM route leads east into the unit. This route seems to have been constructed to provide access to two historic wells which were both drilled and then abandoned in 1963. These wells have been plugged and abandoned for nearly 50 years and the route leading to them shows no signs of maintenance (Waypoints 12 and 13). Another spur route leads south at Waypoint 14; this route was not constructed and exists only because of infrequent cross-country travel by OHVs. Because these routes are not maintained and have no contemporary purpose, they should be left out of the unit.

Similarly, at Waypoint 15 a route departs CR 98 and heads east towards a very old drill site further into the unit. Colorado Oil and Gas Conservation Commission records show this well as having been drilled and abandoned in the early 1950s. The route leading to the well is no longer maintained and is very overgrown in spots (Waypoints 16, 17, and 18); this route does not qualify as a road for wilderness inventory purposes.

At Waypoint 25 there is a route leading to a primitive campsite just beyond Waypoint 26. This campsite is located on a rim overlooking Coal Oil Gulch, and as such, likely sees regular use for car campers or hunting parties. Evidence of recent use was found, including a fire pit. The route leading to this site does show signs of construction (blading). While no obvious signs of recent maintenance were visible, significant growth of plants and shrubs were not found in the median and some maintenance may occur here. Combined with the fact that this short route leads to an outstanding campsite, we have chosen to cherrystem this route into the unit. However, two routes which spur off of this route to the north and south were not cherrystemmed. The route heading north at Waypoint 27 shows signs of original construction (Waypoint 28), yet the likely purpose for this construction (a historical drill location) no longer exists and the route shows no signs of recent maintenance; the route is eroded (Waypoint 28) and overgrown (Waypoint 27) and is largely impassable to passenger vehicles at this time. A pirate route heads south at Waypoint 29—this route was never constructed and also does not qualify as a WIR.

Another short spur route departs CR 98 near Waypoint 30. Waypoint 31 shows this route as it heads north to a point where it disappears at Waypoint 32. This route is a two-track route that is likely maintained solely by the occasional passage of vehicles. No known purpose of this route could be ascertained and no signs of original construction or maintenance were found. Large sagebrush is growing in the median of the route and the route disappears completely after less than 200 yards. A small spur route heading east off the main route is recovering its natural contours and is obviously not maintained (Waypoint 33).

On the northern boundary of Coal Oil Gulch, a number of routes venture south into the unit. These routes largely do not meet the criteria for WIRs and as such should be left out of the unit. However, there are two routes that we have chosen to cherrystem into the unit for several reasons. These routes and the non-maintained ways are detailed here. First, at Waypoint 34, the BLM's desktop inventory boundary temporarily travels south away from CR 98 along a constructed but unmaintained route. Waypoint 34 shows this route at its conjunction with CR 98. In less than a tenth of a mile this route shows obvious signs of a lack of maintenance, including a sloped and unbladed road course (Waypoint 35); less than two-tenths of a mile further south, the route is washed out and impassable and sees no use (Waypoint 36). On the east side of this short cut-out, BLM's desktop inventory comes back to CR 98 along a route that is so overgrown and unmaintained as to be unnoticeable (Waypoint 38); where this boundary meets CR 98, the route is in better shape, but does not show signs of original construction using mechanical means or maintenance. The boundary for the Coal Oil Gulch unit here should follow BLM 1539, rather than briefly cut into the unit along these overgrown and non-maintained routes.

At Waypoint 39, a route leaves BLM 1539 and heads south past a small stock pond (Waypoint 41) and then makes its way down to the bottom of a small drainage feeding Coal Oil Gulch. This route appears to be maintained to the stock pond (Waypoint 44). There is a small section of fencing along the route here which, although substantially unnoticeable, does appear to be recently maintained and is in working order (Waypoint 42). Just past the stock pond the road rapidly deteriorates—there are large shrubs and bushes in the center of the route and no signs of maintenance (Waypoints 43

and 45). For this reason, we have chosen to cherrystem this route for one-half mile from BLM 1539 to the stock pond at Waypoint 44. A small spur route departs this route near the top and leads east (Waypoint 40). This route is obviously not maintained (Waypoint 41) and does not meet the criteria for a WIR.

The BLM's desktop inventory boundary again leaves BLM 1539 to head south and then east at Waypoint 46. Initially, this boundary follows a route; however, this route is not maintained and is not constructed using mechanical means (Waypoint 47). At Waypoint 47 the route is impassable and shows no signs of use, let alone maintenance. South of Waypoint 47, the BLM's boundary (now following no visible road or other impact) turns east, eventually meeting an overgrown and non-maintained two-track route that sees little to no use (Waypoint 48). The boundary then continues east along this unmaintained route (Waypoint 59) towards Blue Mountain Road. Because neither the north-to-south, nor west-to-east portions of this boundary follow WIRs or other features, this boundary should be moved north back to BLM 1539.

Although the BLM's desktop inventory boundary does not include it, we have opted to cherrystem into the unit the route heading south from BLM 1539 at Waypoint 49. At the onset, this route appears to be regularly maintained—unlike similar routes in the area, this route has no visible vegetation growing in the median (Waypoint 49) and appears to be regularly traveled. However, at Waypoint 51 the route splits, with one branch heading south and then west into Coal Oil Gulch proper, and another route heading up a hill to the east, eventually dropping down to a primitive campsite along the rim at Waypoint 58. The character of the route shifts sharply at this point; the route leading west into Coal Oil Gulch no longer shows signs of maintenance, with large rocks and shrubs in the tread and median (Waypoints 51 and 53). Further down (west), this route becomes washed out as it crosses a deep arroyo (Waypoint 54). As the route enters the deepest part of Coal Oil Gulch, it is very overgrown and sees little to no use (Waypoint 55). Because of the lack of maintenance and no obvious signs of original construction using mechanical means, this route does not qualify as a WIR. However, the route leading up the hill and east at the fork does show signs of maintenance (Waypoints 56 and 57) and has a purpose of leading to the established primitive campsite along the rim at Waypoint 58. This route should be cherrystemmed into the unit as it appears to qualify as a WIR.

At Waypoint 64, an unmaintained but passable two-track departs the powerline corridor and heads south into the unit. This route shows no signs of regular maintenance (Waypoint 69) and simply fades out altogether near Waypoint 71. At Waypoint 72 there is no track remaining whatsoever. This route has no known purpose, appears to see little use, does not have any obvious evidence of original construction, and shows no signs of regular maintenance using mechanical means; thus, it does not qualify as a WIR.

As mentioned above, the BLM's desktop inventory produced a northern boundary for the Coal Oil Gulch unit that, instead of following the graded and maintained CR 98/BLM 1539, follows an unmaintained two track just to the south—from roughly Waypoint 47 east along the routes shown in the photos Waypoint 48 and Waypoint 59. The desktop inventory boundary continues east past Waypoint 59 along this unmaintained route for three-fourths of a mile until it eventually crosses the route represented by Waypoint 69, where it then cuts directly east across the sagebrush desert to its intersection with CR 134 at Waypoint 67. This section of the BLM's northern boundary does not follow a WIR, and between Waypoints 69 and 67 this boundary line follows no on-the-ground feature at all. This boundary should be moved north to the graded and maintained BLM 1539 and the substantially noticeable transmission line corridor between Waypoints 64 and 65.

The eastern boundary of the Coal Oil Gulch Unit should begin where the transmission lines cross CR 134 (Blue Mountain Road) at Waypoint 65. The boundary then travels south along the State Land/BLM boundary line to where it meets CR 134 again at Waypoint 68. From here the route travels south along the paved road until it reaches private property. From Waypoints 73 to 74, the southern boundary of the unit follows the lines produced by the BLM desktop inventory, avoiding private lands and the extensive oil and gas development of the Rangely Oil Field.

After incorporating the small change listed above and shown on the attached map, the Coal Oil Gulch unit contains 12,400 contiguous roadless acres of BLM lands and thus meets the size criterion as outlined in BLM Manual 6310.

II. *Coal Oil Gulch proposed LWC is primarily affected by the forces of nature.*

Coal Oil Gulch is a relatively large area of intact public lands with very few human impacts. From atop one of the numerous ridges along the western and northern edges of the unit (Waypoint 9, Waypoint 58), one can look out over large sections of Coal Oil Gulch and see no sight that appears man-made or unnatural. At the lower elevations of the unit, among the sagebrush and deep arroyos in the center of the unit, the area appears natural in almost every sense—long plains of sagebrush spread out uninterrupted below sandstone cliffs, and deep arroyos continue to be shifted and carved out by the occasional flash flood (Waypoints 22, 23, and 68).

The primary human impacts are associated with oil and gas development and remnant OHV trails. Just outside the southern boundary of the unit, intensive oil and gas activity occurs in and around the Rangely Oil Field. In the far northern portion of the unit, several antiquated and non-maintained two-tracks and other OHV trails exist, as well as some minor cattle infrastructure including fencing and stock ponds. As seen in Waypoint 44, even the stock pond in this portion of the unit has a natural appearance. The oil and gas development in the south is outside of the unit, and although occasionally visible from the highest reaches of the unit to the north and west, remains screened and imperceptible from the vast majority of the unit. When viewed in the scope of the entire 12,400 acre unit, these impacts are relatively minor and in no way detract from the overall naturalness of Coal Oil Gulch.

III. Coal Oil Gulch proposed LWC provides outstanding opportunities for solitude and primitive recreation.

With 12,400 acres of twisting arroyos, immaculate juniper forests, broken shale badlands, and vast sagebrush flats, Coal Oil Gulch provides ample opportunities for solitude and primitive recreation. Because the topography of this unit is so varied—with high pinyon-covered mesas separating numerous sandstone-sided gulches and narrow arroyos, the casual visitor can easily escape other human interactions and have an experience of solitude and quiet. The lower depths of any of the side canyons of Coal Oil Gulch are rarely visited, and provide hidden reaches where one could stay for days in solitude. In the dense pinyon and juniper woodlands in the north part of the unit and on the higher mesas in the west, a short walk will immediately sweep you away into a perception of deep remoteness. The shape of the unit also contributes to the opportunities for solitude, as the compact rectangular shape means that anyone who ventures into the center of the unit is unlikely to encounter another human being. During our two visits to the unit in September of 2012, not one other human being was encountered either within the unit, or along its boundary roads. Solitude is not difficult to find in Coal Oil Gulch.

Opportunities for primitive and unconfined recreation are also found in Coal Oil Gulch. One can sit below the striking cliffs along the northwest and central part of the unit and watch prairie falcons, ferruginous hawks and golden eagles soar on the thermals or prey the flatlands for a mid-day meal. In the darkest winters, elk and mule deer can be found in large numbers along the northern reaches of the unit, providing wildlife-viewers and photographers with an outstanding opportunity to witness these iconic animals while experiencing the solitude that a winter in this isolated portion of Colorado can provide. Hiking and camping opportunities also exist and are especially enjoyable along the northern and western sandstone rims, where one can experience vast views over the White River to the south and east.

VIII. Coal Oil Gulch proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found Coal Oil Gulch proposed LWC to contain several supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. Nearly the entire unit is classified by Colorado Parks and Wildlife as a winter concentration area for elk, and pronghorn and mule deer also utilize parts of the unit in the winter. Coal Oil Gulch also contains over 1,000 acres of active white-tailed prairie dog colonies, and the entire unit is considered historical habitat for the greater sage-grouse. This unit also overlaps with the Dinosaur Lowlands Master Leasing Plan area that was accepted by the BLM in 2011.

Summary Conclusion

Our extensive on-the-ground inventory of the Coal Oil Gulch unit shows that the BLM was correct in identifying this area as one that could qualify as Lands with Wilderness Characteristics. The boundaries created through the BLM's desktop inventory of potential LWCs is largely correct for this unit, except for the southwestern corner of the unit. That should be deleted to account for the graded and maintained road leading to the Mellen Hill communications array and the incorrectly placed northern boundary of the unit. At 12,400 acres in size and with a broken and convoluted topography, Coal Oil Gulch easily offers up outstanding solitude and places of refuge. Human impacts are minor, heavily screened by topography and vegetation, and lie primarily just outside or on the fringes of the unit, meaning that the majority of the unit has apparent naturalness and impacted primarily by the forces of nature.

Our inventory has documented necessary boundary adjustments as well as the wilderness characteristics of the area. It is imperative that the BLM now do the same, before any land management decisions are made that might degrade these qualities

This overview provides new information, including maps and photos, documenting that the 12,400 acre Coal Oil Gulch unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Coal Oil Gulch Photopoints

The following photographs correspond with the numbered icons on the attached Coal Oil Gulch unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Coal Oil Gulch (1) - NE

Coal Oil Gulch (2) - S

Coal Oil Gulch (3) - NE

Coal Oil Gulch (4) - ESE

Coal Oil Gulch (5) - NE

Coal Oil Gulch (6) - NNE

Coal Oil Gulch (7) - NNE

Coal Oil Gulch (8) - SSW

Coal Oil Gulch (9) - NNE

Coal Oil Gulch (10) - NE

Coal Oil Gulch (11) - NE

Coal Oil Gulch (12) - NE

Coal Oil Gulch (13) - N

Coal Oil Gulch (14) - S

Coal Oil Gulch (15) - E

Coal Oil Gulch (16) - SE

Coal Oil Gulch (17) - S

Coal Oil Gulch (18) - SE

Coal Oil Gulch (19) - N

Coal Oil Gulch (20) - E

Coal Oil Gulch (21) - SE

Coal Oil Gulch (22) - S

Coal Oil Gulch (23) - NE

Coal Oil Gulch (24) - ESE

Coal Oil Gulch (26) - NNE

Coal Oil Gulch (27) - ENE

Coal Oil Gulch (28) - NE

Coal Oil Gulch (29) - S

Coal Oil Gulch (30) - E

Coal Oil Gulch (31) - N

Coal Oil Gulch (32) - N

Coal Oil Gulch (33) - E

Coal Oil Gulch (34) - S

Coal Oil Gulch (35) - SSE

Coal Oil Gulch (36) - SE

Coal Oil Gulch (37) - S

Coal Oil Gulch (38) - W

Coal Oil Gulch (40) - SE

Coal Oil Gulch (41) - E

Coal Oil Gulch (42) - NNW

Coal Oil Gulch (43) - SW

Coal Oil Gulch (44) - W

Coal Oil Gulch (45) - NW

Coal Oil Gulch (47) - S

Coal Oil Gulch (48) - SW

Coal Oil Gulch (49) - S

Coal Oil Gulch (50) - SE

Coal Oil Gulch (51) - S

Coal Oil Gulch (52) - S

Coal Oil Gulch (53) - NE

Coal Oil Gulch (54) - WNW

Coal Oil Gulch (55) - SW

Coal Oil Gulch (56) - E

Coal Oil Gulch (57) - W

Coal Oil Gulch (58) - W

Coal Oil Gulch (59) - E

Coal Oil Gulch (60) - E

Coal Oil Gulch (61) - SE

Coal Oil Gulch (62) - ESE

Coal Oil Gulch (68) - W

Coal Oil Gulch (69) - SE

Coal Oil Gulch (70) - ENE

Coal Oil Gulch (72) - SE

Coal Oil Gulch (73) - Solitude

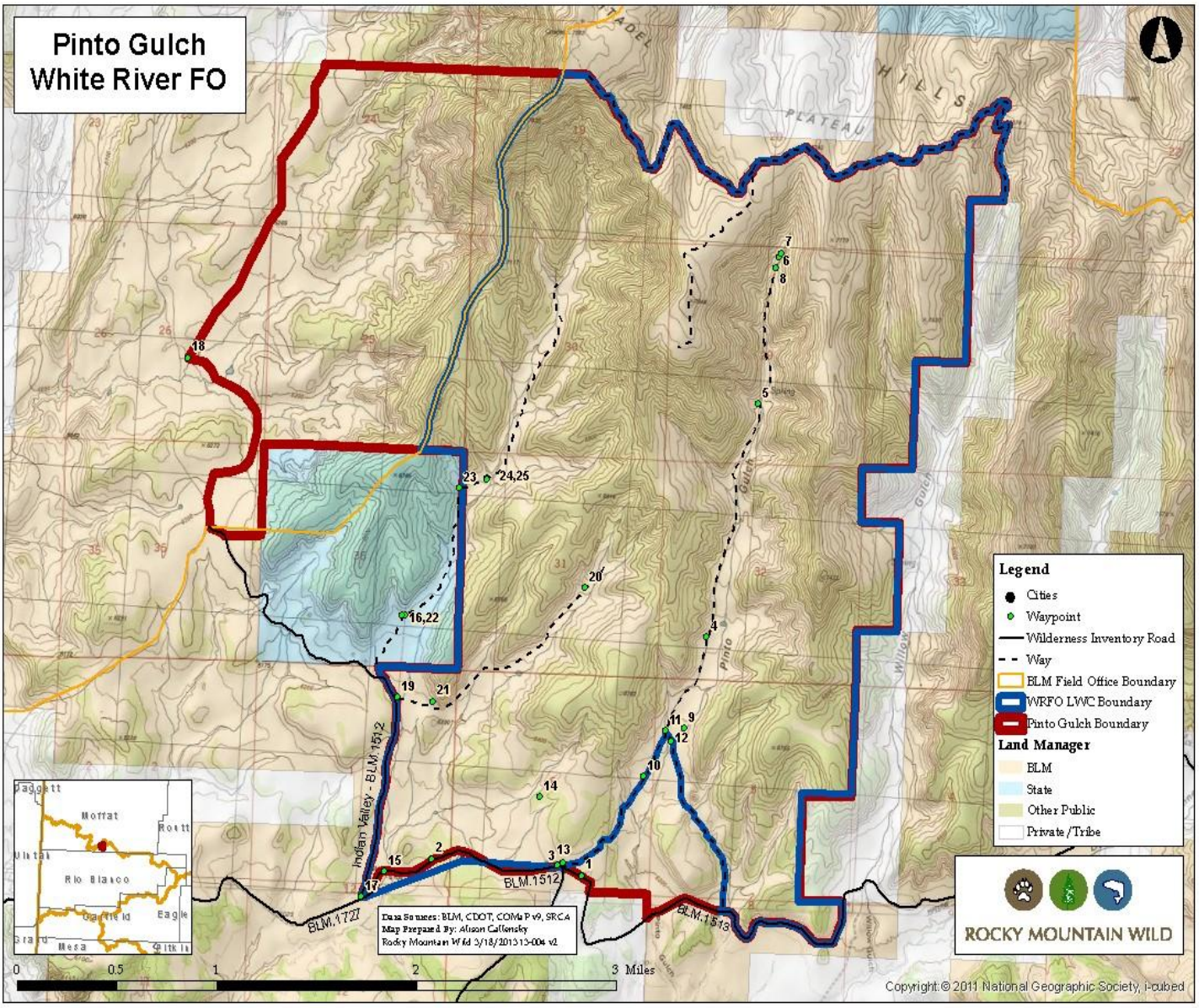
Coal Oil Gulch (74) – Unconfined Rec

Coal Oil Gulch (75) - Scenic

Lands with Wilderness Characteristics Recommendations: Pinto Gulch

Pinto Gulch. *Photo: Kurt Kunkle*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Pinto Gulch
White River FO
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
BLM Field Office Boundary
WRFO LWC Boundary
Pinto Gulch Boundary
Land Manager
BLM
State
Other Public
Private /Tribe
BLM.1512
BLM.1727
BLM.1513
Indian Valley - BLM.1512
Data Sources: BLM, CDOT, COMaP v9, SRC4
Map Prepared By: Alison Caffensky
Rocky Mountain Wild 3/18/2013-004 v2
ROCKY MOUNTAIN WILD
0 0.5 1 2 3 Miles
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Overview and Boundary Delineation:

The Pinto Gulch proposed Lands with Wilderness Characteristics unit (LWC) is about 22 miles northwest of Meeker, Colorado in the Danforth Hills of Moffat County. The 6,360 acre Pinto Gulch unit is comprised of several drainages, including Pinto Gulch, which begin on the Citadel Plateau and drain into Deep Channel Creek. Sagebrush dominates the bottom lands and pinion-juniper woodlands dominate the uplands. Deer, elk, golden eagle, sage grouse and black bear can be found in Pinto Gulch. The unit is bounded on the east by private property, on the south by BLM road 1512, and on the west and north by unnamed BLM roads.

Pinto Gulch was identified by BLM's White River Field Office as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In their report, the BLM identified an area of 6,000 acres (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in their LWC inventory report contain several inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During the summer of 2012, Conservation Colorado visited the Pinto Gulch area to conduct an in-depth, on-the-ground field inventory of the Pinto Gulch LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this case, Conservation Colorado identified several adjustments that should be made to the BLM's proposed Pinto Gulch LWC boundary in order to bring it in line with the policies laid out in Manual 6310. Once these adjustments are made, a more complete picture of the area's outstanding wilderness character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary changes:

I. Pinto Gulch proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Pinto Gulch unit comprises a block of 6,360 acres of contiguous roadless acres. 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 road, 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). All Waypoints referred to in the narrative below can be seen in the attached photo sheet for Pinto Gulch.

Conservation Colorado has found several instances where the BLM's desktop inventory boundaries do not match up to realities on the ground and must be altered to match the language and intent of Manual 6310. The southern boundary which is defined by BLM road 1513 and 1512 is shown in Waypoints 1 and 2. Waypoint 1 shows a private gate blocking public access along 1513 to the east and Waypoint 2 shows road 1512. BLM's boundary for Pinto Gulch excluded the beginning of the unnamed route up Pinto Gulch and a connector road in a triangle shape. As demonstrated in Waypoints 3, 4 and 5, the route up Pinto Gulch is a 'way' and can be included in the unit. The Pinto Gulch route is not maintained by mechanical means, so the BLM included the remainder of this route within the boundary. The route that connects to 1513 beyond the private gate has been closed by the BLM as shown in Waypoint 12. The beginning of this route can be seen in Waypoint 11. A short 'way' begins at Waypoint 13 and ends at Waypoint 14. Conservation Colorado updated the southern boundary so that it follows BLMs road 1513 and 1512, including the triangle shape that the BLM had excluded. Another route enters the unit along the southern boundary in the southwest corner at Waypoint 9; this 'way' ends at Waypoint 16. This route has been included in the unit.

The BLM's proposed western boundary has also been updated. BLM's boundary followed BLM Road 1512, excluding state land, and then followed a ridgeline. Starting at the southwest corner of the unit photo, Waypoint 17 shows BLM Road 1512, this acts as the boundary. Waypoint 18 helps denote the boundary as it continues north. Conservation Colorado field staff checked two of the routes that enter the unit along the western boundary; both routes are included within the BLM boundary. One route begins at Waypoint 19 and can be seen near its end in Waypoint 20. This route is not maintained and does not access any feature, so is considered a 'way'. The other inventoried 'way' enters the unit from the state land section at Waypoint 23. The beginning of the route is shown in Waypoint 22 and a difficult ravine crossing in Waypoint 24. The section of the western boundary along the ridgeline has been moved to follow an unnamed BLM road consistent with policies laid out in Manual 6310. This expansion has not been field checked, but review on Google Earth leads us to believe that it is a qualifying addition to the unit.

The northern boundary of the unit follows private lands and an unnamed BLM route. Conservation Colorado does not recommend any changes to the BLM boundary here. Vehicle access is blocked by private land.

The eastern boundary follows an unnamed BLM route and private land. Conservation Colorado does not recommend any changes to the BLM boundary. Vehicle access is blocked by private land.

II. Pinto Gulch LWC is primarily affected by the forces of nature.

Pinto Gulch has been affected primarily by the forces of nature and all human impacts within the unit are substantially unnoticeable. The vehicle routes discussed above are of a low density, and do not impact the unit's naturalness. A small dam and defunct stock trough were discovered at the top of Pinto Gulch proper (Waypoints 6 and 7). These features are well-screened and are substantially unnoticeable. Waypoints 8, 9 and 10 show the natural quality of the unit along Pinto Gulch. Waypoints 21 and 25 show the natural quality of the unit west of Pinto Gulch. No other human impacts were found within the unit. The Pinto Gulch unit is natural.

III. Pinto Gulch LWC provides outstanding opportunities for solitude and primitive recreation.

The Pinto Gulch unit is comprised of several drainages leading from the Citadel Plateau down toward Deep Channel, which is outside of the unit. There are two main drainages, Pinto Gulch being the longest and only named drainage, and several smaller drainages. The drainages are divided by scenic ridges. The unit offers outstanding opportunities for solitude, and for primitive and unconfined recreation. Both solitude and recreation can be found hiking up any of the diversity of drainages. For more challenging recreation opportunities, one could climb to the ridge tops and explore the unit from above. A diverse array of activities can be sought within the unit including hiking, camping, horseback riding, hunting, nature photography, and nature study. Waypoints 8, 9, 10, 21 and 25, as well as the various shots of the two tracks, depict a unit with varying topography, vegetation and ample opportunities for young and old to explore, challenge oneself, and seek solitude from everyday life.

VIII. Pinto Gulch LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Pinto Gulch LWC has supplemental values. The values described here are a result of comparing the Pinto Gulch boundaries to data available from Colorado Parks and Wildlife. Other values such as cultural, historic, geologic and others have yet to be researched. These other values must be researched to gain a full picture of the unit's supplemental values.

Colorado Parks and Wildlife's information tells us that Pinto Gulch provides historic habitat, brood area, Northwest Colorado Population Preliminary Priority Habitat and Production Area and overall range for the Greater Sage-grouse; active leks are present in the area. In addition, this is considered fall/winter range and/or production areas for bald eagles, black bears, elk, golden eagles and mule deer.

The Citadel STL Colorado State Wildlife Area is adjacent to the unit.

Summary Conclusion

Our on-the-ground inventory of the Pinto unit shows that the BLM was correct in identifying this as having Lands with Wilderness Characteristics. Two boundary changes, one at the base of Pinto Gulch and the other in the north western section of the unit are warranted based on our field work and Google Earth investigations.

The Pinto Gulch unit is a unique area that provides solitude and primitive recreation. Taken in the context of the larger landscape that is experiencing pressure from drilling activity, the Danforth Hills is experiencing increasing development, oil and gas leasing and drilling, making the Pinto Gulch area more valuable as a LWC. Much of the Danforth Hills is either private land or the private land inhibits access to public lands and this unit provides a great opportunity for the public to have a wilderness experience.

Our inventory has documented suggested boundaries as well as the wilderness characteristics located in the Boise Creek unit. It is imperative that the BLM give this unit a full inventory to document these and any additional outstanding wilderness characteristics before any land management decisions are made that might negatively affect these resources.

This overview provides new information, including maps and photos, documenting that the 6,360 acre Pinto Gulch unit meets wilderness criteria. This area deserves to be recognized as a Lands with Wilderness Characteristics unit and its wilderness values protected.

Pinto Gulch Photo Points

The following photographs correspond with the numbered icons on the attached Pinto Gulch unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Pinto (1) - E

Pinto (2) - W

Pinto (3) - E

Pinto (4) - N

Pinto (5) - N

Pinto (6) - S

Pinto (7) - S

Pinto (8) - W

Pinto (9) - N

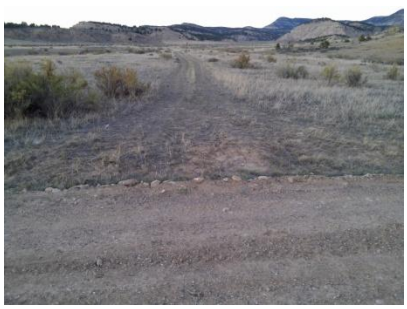
Pinto (10) - W

Pinto (11) - SE

Pinto (12) - SE

Pinto (13) - N

Pinto (14) - N

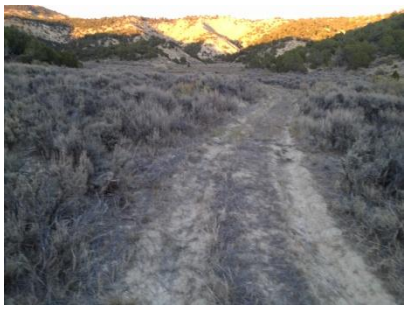


Pinto (15) - N

Pinto (16) - S

Pinto (17) - N

Pinto (19) - E



Pinto (20) - N

Pinto (21) - NE

Pinto (22) - NE

Pinto (23) - N

Pinto (24) - NE

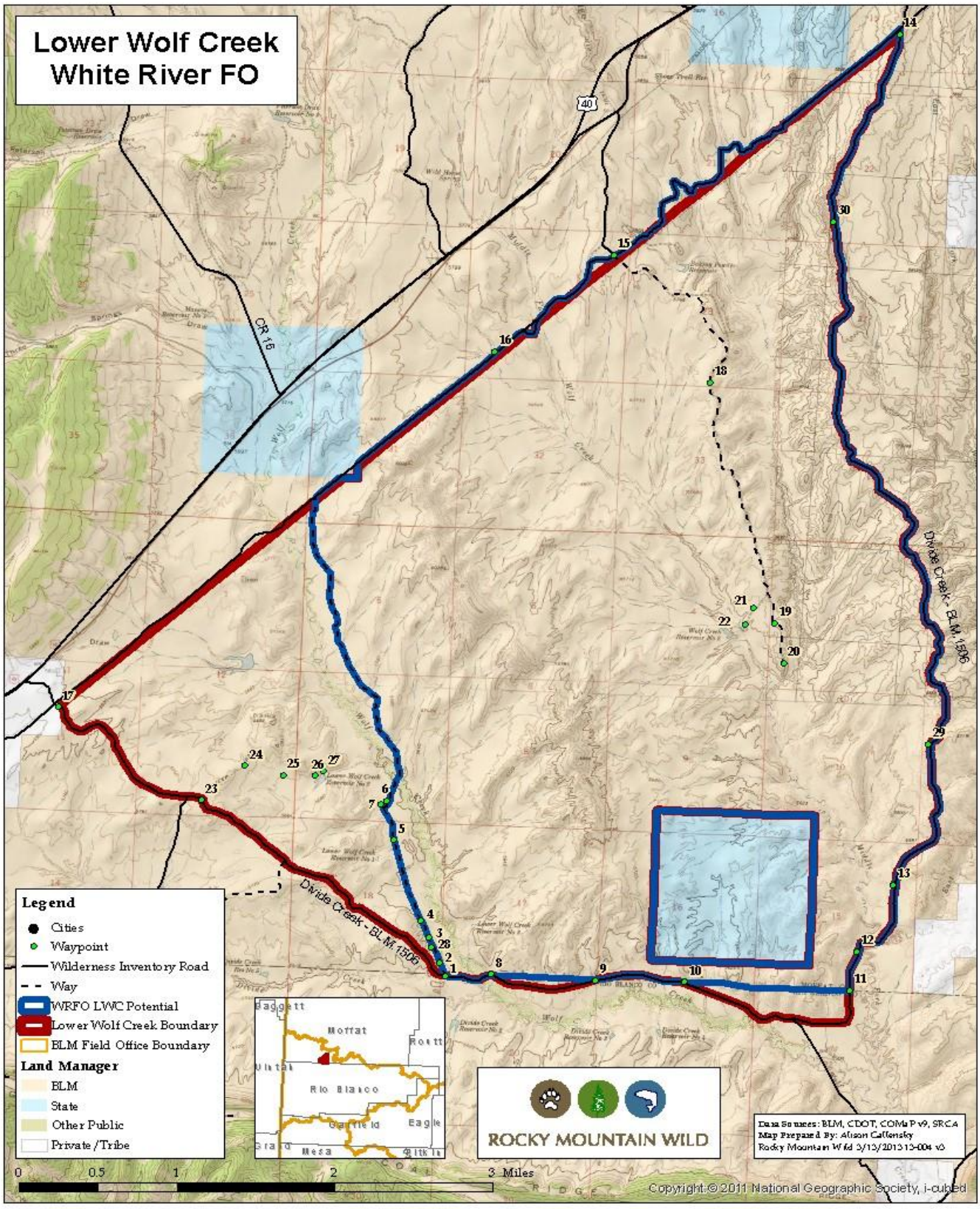
Pinto (25) - NE

Lands with Wilderness Characteristics Recommendations:

Lower Wolf Creek

Lower Wolf Creek, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Lower Wolf Creek
White River FO
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Lower Wolf Creek Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private / Tribe
Divide Creek - BLM 1506
CR 15
40
Baggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
0
0.5
1
2
3 Miles
ROCKY MOUNTAIN WILD
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 3/13/2013-004 v3
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Overview and Boundary Delineation:

Two broad drainages of Wolf Creek flow south through multi-hued badlands and broken arroyos towards the White River east of Rangely, Colorado. These drainages contain the ephemeral creeks of the lower main stem of Wolf Creek and the Middle Fork of Wolf Creek, and provide small pockets of unique riparian habitats in an otherwise arid saltbush- and sagebrush-dominated environment. Above and separating these two drainages is a large and barren ridge rising to over 6,600', which provides excellent views over these unique habitats and north towards Dinosaur National Monument. The Lower Wolf Creek proposed Lands with Wilderness Characteristics (LWC) unit is an 11,600-acre unit encompassing these features.

Nearly the entirety of the Lower Wolf Creek unit overlaps with lands utilized for the multi-agency effort to reintroduce the extremely rare black-footed ferret. In addition, thousands of acres of priority habitat for the greater sage-grouse are located within the unit. Lower Wolf Creek is truly a refuge for some of northwest Colorado's rarest species.

Because of Lower Wolf Creek's unique topography and outstanding naturalness, the area provides opportunities to experience solitude while exploring the big skies and unimpeded views of the relatively low-lying area of northwest Colorado. On a clear day, one gets the impression that the sagebrush plains are endless and that the only impediment to your travels is your own will to continue. Outstanding opportunities for primitive recreation are found bird-watching and hunting, and in the unique backpacking, hiking, and camping opportunities found among the wild arroyos of Lower Wolf Creek and its tributaries.

The unit's boundaries are made up by: BLM 1506 (Divide Creek Road) and unnamed BLM roads on the west and south; BLM 1506 on the east: and a large energy transmission line corridor on the north. The unit sits at elevations between 5,500' and 6,600'.

Lower Wolf Creek was identified by BLM's White River Field Office as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In the report, the BLM identified an area of 9,600 acres around Lower Wolf Creek (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in the LWC inventory report contain small inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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). During May of 2012, The Wilderness Society visited the Lower Wolf Creek area to conduct an in-depth, on-the-ground field inventory of the Lower Wolf Creek LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this particular case, the Wilderness Society identified several prominent locations where the BLM's proposed boundary failed to meet the criteria laid out in its own policies. The northern portion of the unit included a large

transmission line and corridor which we found to be substantially noticeable and which we have therefore cut out from the unit. Further, the BLM's western boundary for the unit followed a non-maintained route that does not meet the criteria for a LWC boundary as laid out in BLM's own policies. Once these adjustments are made, a more complete picture of the area's outstanding wilderness character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Lower Wolf Creek proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Lower Wolf Creek unit comprises a block of 11,600 contiguous roadless acres. 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).

The Wilderness Society proposes two changes to the BLM's desktop inventory boundaries for the Lower Wolf Creek unit to better meet the policies recited above. These changes, and other assessments of boundary features, are detailed below and in the attached photo sheet for Lower Wolf Creek.

The BLM's desktop inventory produced a western boundary for the Lower Wolf Creek unit beginning at Waypoint 1. This boundary departs BLM 1506 and heads north along a faint and revegetating, unnamed BLM route along the banks of the main stem of lower Wolf Creek. At its inception, this route shows no signs of maintenance (Waypoint 1). Numerous small plants can be seen growing in the roadbed, both within the tracks and inside the median, and in many places this vegetation is similar in size and maturity to the vegetation on the edges of the route, indicating a lack of maintenance (Waypoint 2). At Waypoint 4, the route is nearly invisible to the naked eye, and by Waypoint 5, the route only shows signs of travel by cattle or big game; no vehicle tracks are visible (Waypoint 6). After just over a mile, the BLM's boundary departs this unnamed and unmaintained route and crosses the Lower Wolf Creek arroyo where no visible road exists (Waypoint 7). This boundary revealed no signs of original construction using mechanical means and is clearly no longer being maintained. This boundary should be deleted and moved west to BLM 1506 (see map).

Along the southern boundary of the unit, the BLM drew a straight line along the county line separating Moffat County and Rio Blanco County (Waypoints 8 through 11). County lines are not qualifying features for LWC boundary delineation and as such this boundary should be moved slightly south to the unnamed BLM road paralleling the north banks of Wolf Creek (see map).

At Waypoint 12, a short non-constructed and non-maintained route heads west towards a Colorado State Lands parcel. This route does not qualify as a WIR.

The BLM's desktop inventory produced a northern boundary for the Lower Wolf Creek unit which followed an unnamed BLM route roughly paralleling, and just to the north of, a large power line and transmission corridor (Waypoint 16). Rather than following the road, this boundary should be drawn just to the south of the transmission line and corridor in order to exclude it from the unit entirely.

A short route departs this power line corridor at Waypoint 15 and heads south into the unit. This route shows no signs of original construction using mechanical means; the route appears to have been created solely through the passage of vehicles (Waypoint 18). As the route proceeds south, large sagebrush can be seen growing inside the median and within the tracks (Waypoint 19, Waypoint 20). The route ends abruptly where it drops into the arroyos of Middle Fork Wolf Creek just south of Waypoint 20. A small spur route at Waypoint 21 leads southwest into the Middle Fork Wolf Creek drainage and an antiquated water impoundment structure. As seen in Waypoint 22, this route is impassable to vehicles and is not maintained. Neither of these routes qualifies as WIRs.

Along the western boundary of our proposed Lower Wolf Creek LWC unit, a short route heads east off of BLM 1506 at Waypoint 23. This route leads to a small, dry water impoundment structure (Waypoint 27). While this structure appears to have been somewhat recently lined, the route leading to the structure does not appear to be either constructed or maintained (Waypoints 24 through 26). This route does not qualify as a WIR and should be left in the unit.

After incorporating the changes listed above and shown on the attached map, the Lower Wolf Creek unit contains 11,600 contiguous roadless acres of BLM lands and thus meets the size criterion as outlined in BLM Manual 6310.

II. Lower Wolf Creek proposed LWC is primarily affected by the forces of nature.

The Lower Wolf Creek unit exists largely in its natural state. The most significant human impacts in the unit are limited to vehicle routes and water impoundment features. Two relatively lengthy vehicle routes intrude into the unit and are described above; in addition, several short routes lead into the unit, primarily off of BLM 1506 in the western fifth of the unit. All of these vehicle routes are generally reclaiming themselves naturally—many of them are difficult to differentiate from surrounding terrain (Waypoint 1, Waypoint 4, Waypoint 24) and others are simply lightly traveled two-tracks with little significant effect on the naturalness of the unit as a whole (Waypoint 20, Waypoint 3).

The Lower Wolf Creek unit contains numerous small water impoundments that were built as early as the 1930s to control erosion of the fragile soils and to diminish downstream sediment and salinity loads in the White River. While numerous, these structures are generally natural in appearance, have in many cases been reclaimed through natural weather processes, and are difficult to distinguish, even when standing right over them. The impoundments are primarily isolated to the western portions of the unit in the small drainages feeding the main stem of Wolf Creek and most do not have existing vehicle access. Collectively, these structures do not have a detrimental impact on the naturalness of the unit as a whole.

Possibly due to the fact that the entirety of the Lower Wolf Creek proposed LWC unit overlaps with lands given added protections through the BLM's Wolf Creek Ferret Management Area, this unit still exhibits a naturalness that is exceedingly rare in the White River Field Office. No producing oil and gas facilities are located either within or near the periphery of the unit, and only four plugged and abandoned wells are found within the unit—these plugged wells date

as far back as 1950 and are completely obliterated from the landscape at this time. The lack of oil and gas facilities within or in the vicinity of this unit is a unique feature and is likely one reason the area retains its naturalness and is primarily affected by the forces of nature.

The Lower Wolf Creek unit is primarily affected by the forces of nature, and contains only minor human impacts. These impacts do not affect the area's overall naturalness, either individually or cumulatively.

III. Lower Wolf Creek proposed LWC provides outstanding opportunities for solitude and primitive recreation.

The most striking feature of the Lower Wolf Creek unit is its apparent solitude. Whether hiking across one of the wide sagebrush flats in the eastern portions of the unit (Waypoint 32), or scrambling up the rolling ridges that separate the east and main forks of Wolf Creek in the center of the unit (Waypoint 38), the primary experience is one of solitude and quiet. This unit receives very little visitation. Outside of few unmaintained vehicle routes, no existing trail network exists, which in turn provides the visitor an opportunity to get away from signs of man and to experience the rolling terrain in an unimpeded and free manor. In winter, this area is particularly remote and untraveled and any excursion into the area during snowbound months is guaranteed to provide an unrivaled experience of solitude and isolation.

Recreational opportunities are of the primitive sort with outstanding opportunities to explore the wide ephemeral drainages by foot or horseback without being confined to trails or other developed routes. Backpacking to one of the highpoints of the central ridges would provide extraordinary views, and an aficionado of wildlife would no doubt appreciate the unique opportunity to witness the huge colonies of white-tailed prairie dogs that reside throughout much of the unit. With 100 percent of the unit designated by Colorado Parks and Wildlife as either Preliminary Priority or Preliminary General Habitat for the greater sage-grouse, opportunities to witness the unforgettable mating dance of the greater sage-grouse also exist within the unit.

VIII. Lower Wolf Creek proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found Lower Wolf Creek proposed LWC to contain numerous supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. Much of the Lower Wolf Creek unit lies within the White River Field Office's (WRFO) Wolf Creek Ferret Management Area (Wolf Creek MA). The Wolf Creek MA was delineated as part of the WRFO's Resource Management Plan in 1997 and is the site of extensive efforts to reestablish the black-footed ferret in Colorado. The black-footed ferret is possibly the rarest mammal in North America and one of the rarest mammals in the world; it was one of the first species offered protection under the Endangered Species Act of 1973. The Wolf Creek MA was chosen as a location for black-footed ferret reintroductions for several reasons which coincide with its wilderness character, including its current land-use practices, the fact that "it has little ongoing or prospective mineral development", and its healthy white-tailed prairie dog colonies (*A Cooperative Plan for Black-Footed Ferret Reintroduction and Management,* 2001). The entirety of the Lower Wolf Creek proposed LWC unit overlaps with these designated black-footed ferret release sites.

In addition to providing likely the most important habitat for black-footed ferrets remaining in Colorado, Lower Wolf Creek is also the site of important habitat for the ESA-candidate greater-sage grouse, including a lek site, winter habitat, and brood areas. It also contains thousands of acres of Preliminary Priority and Preliminary General Habitat (PGH) as defined by Colorado Parks and Wildlife. Raptors are unusually common in the area, with prairie falcons, red-tailed hawks, burrowing and great horned owls, and northern harriers all utilizing the area. Many ferruginous hawk nest sites are found along Lower Wolf Creek along with nest sites for both bald and golden eagles.

Summary Conclusion

Our extensive on-the-ground inventory of the Lower Wolf Creek unit shows that the BLM was correct in identifying this area as one that could qualify as Lands with Wilderness Characteristics. With 11,600 acres of salt-desert shrublands, sagebrush communities, grasslands, and barren lands, the Lower Wolf Creek unit contains a wide variety of wildlife habitats, making it a unique region in the White River Field Office. With no ongoing oil and gas development and few vehicle routes or other intrusions, the Lower Wolf Creek unit is primarily affected by the forces of nature and retains its apparent naturalness. With 100 percent of the unit recognized as important habitat for the greater sage-grouse and with the area designated as a special management area for the reintroduction of the black-footed ferret — the rarest mammal in North America—the Lower Wolf Creek unit has amazing wildlife resources that would benefit from the added protections afforded an LWC. Our inventory has documented necessary boundary adjustments as well as the wilderness characteristics of the area. It is imperative that the BLM now do the same, before any land management decisions are made that might degrade these qualities

This overview provides new information, including maps and photos, documenting that the 11,600 acre Lower Wolf Creek unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Lower Wolf Creek Photopoints

The following photographs correspond with the numbered icons on the attached Lower Wolf Creek unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Lower Wolf Creek (1) - NNW

Lower Wolf Creek (2) - NNW

Lower Wolf Creek (3) - NNW

Lower Wolf Creek (4) - N

Lower Wolf Creek (5) - N

Lower Wolf Creek (6) - NNW

Lower Wolf Creek (7) - N

Lower Wolf Creek (12) - W

Lower Wolf Creek (13) - WSW

Lower Wolf Creek (15) - W

Lower Wolf Creek (16) - W

Lower Wolf Creek (17) - NE

Lower Wolf Creek (18) - S

Lower Wolf Creek (19) - SE

Lower Wolf Creek (20) - S

Lower Wolf Creek (21) - SW

Lower Wolf Creek (22) - S

Lower Wolf Creek (23) - N

Lower Wolf Creek (24) - NNE

Lower Wolf Creek (25) - SE

Lower Wolf Creek (26) - WSW

Lower Wolf Creek (27) - E

Lower Wolf Creek (28) - S

Lower Wolf Creek (29) - W

Lower Wolf Creek (30) - SW

Lower Wolf Creek (31) - Naturalness

Lower Wolf Creek (32) - Solitude

Lower Wolf Creek (33) - Naturalness

Lower Wolf Creek (34) - Naturalness

Lower Wolf Creek (35) - Naturalness

Lower Wolf Creek (36) - Naturalness

Lower Wolf Creek (37) - Naturalness

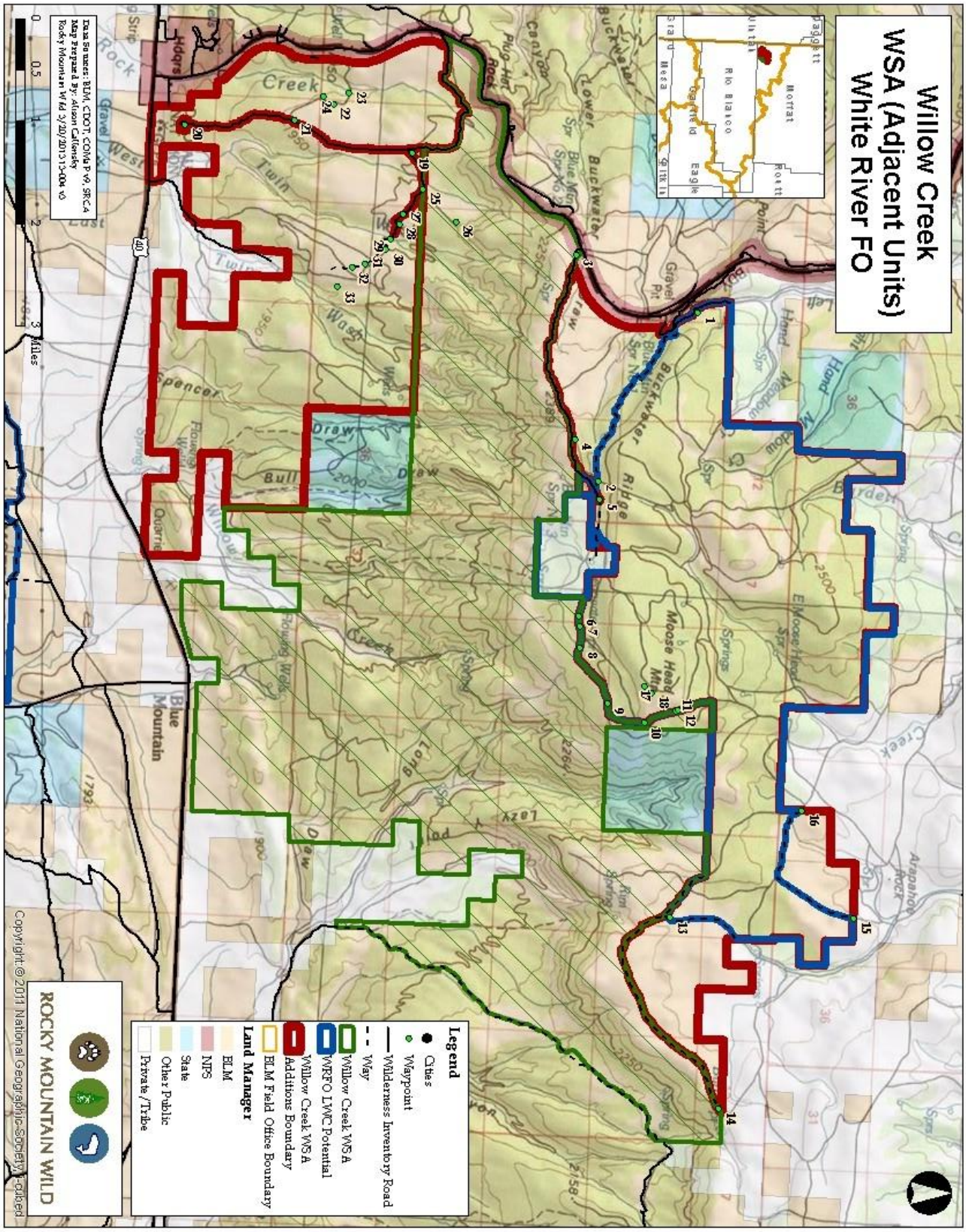
Lower Wolf Creek (38) - Solitude

Lands with Wilderness Characteristics Recommendations:

Willow Creek WSA (Adjacent Units)

Willow Creek WSA (Adjacent Units) *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Willow Creek
WSA (Adjacent Units)
White River FO
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
Willow Creek WSA
WRFO LWC Potential
Willow Creek WSA
Additions Boundary
ELM Field Office Boundary
Land Manager
ELM
NPS
State
Other Public
Private/Tribe
ROCKY MOUNTAIN WILD
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Overview and Boundary Delineation:

The Willow Creek WSA (Adjacent Units) proposed Lands with Wilderness Characteristics (LWC) unit is located between Dinosaur National Monument and US Highway 40 near the town of Dinosaur in Moffat County, Colorado. These units offer some of the most spectacular scenery in Colorado, with 1,000-foot-high sandstone cliffs guarding cottonwood-lined canyons, and thick aspen stands overlooking sprawling sagebrush flats. At the highest elevations near Moosehead Mountain, views can be had both north towards Dinosaur National Monument and south across much of Western Colorado.

The Willow Creek WSA (Adjacent Units) is made up of two units—Moosehead Mountain and Twin Wash. Moosehead Mountain abuts the northern boundary of Willow Creek WSA and is 8,100 acres of aspen woodlands, sagebrush hills, and hidden springs. The unit is bounded by private lands on the north and east; the Willow Creek Wilderness Study Area to the south; and National Park Service and private lands to the west. Moosehead Mountain was identified by BLM's White River Field Office (WRFO) as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In the report, the BLM identified an area of 6,500 acres around Moosehead Mountain (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer that doesn't differentiate between those roads that qualify for Wilderness Inventory Roads under BLM Manual 6310 and those that do not. Therefore, the boundaries proposed by the BLM in the LWC inventory report contain small inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

Twin Wash is 5,900 acres of healthy sagebrush flats, pinyon and juniper lined draws, and ephemeral waterways lined with cottonwood trees. It is bounded by the Willow Creek WSA and lands owned by the State of Colorado on the north; private lands and the Willow Creek WSA on the east; private lands on the south; and National Park Service lands on the west. The Twin Wash unit was not identified as a potential LWC through the BLM's desktop inventory of this area; however, our in-depth field inventory of this unit shows that Twin Wash does in fact meet the criteria for a Lands with Wilderness Characteristics unit, based on its size and location adjacent to the Willow Creek WSA, along with its other wilderness characteristics which are documented below.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

Together these units comprise 14,000 acres of contiguous roadless lands that lie adjacent to the BLM recommended wilderness currently being managed by the Bureau of Land Management as the Willow Creek Wilderness Study Area.

The Willow Creek WSA (Adjacent Units) unit are roadless, natural and offers outstanding opportunities for solitude and primitive and unconfined recreation. These units represents an extension of the Wilderness characteristics documented for Willow Creek WSA in both the 1991 *Craig District Wilderness Study Report* and in the BLM's earlier *Final Wilderness Study Report* from November of 1980. These reports found the Willow Creek WSA to contain apparent naturalness, outstanding opportunities for solitude, and to have a variety of primitive and unconfined recreational opportunities.

The 1980 Final Wilderness Study Report for Willow Creek also found the area to have supplemental values including fossil-bearing formations much like those for which Dinosaur National Monument was created to protect, as well as the oldest known living pinyon trees in North America. Significant undocumented cultural resources also exist in the area.

During September and October of 2012, The Wilderness Society visited the Willow Creek WSA (Adjacent Units) area to conduct an in-depth, on-the-ground field inventory of the Willow Creek WSA (Adjacent Units) LWC. Our goal was to assess whether contiguous acres of unroaded BLM lands abutted the portions of the Willow Creek WSA that has been recommended for wilderness designation by the BLM's White River Field Office and to assess the wilderness characteristics of these areas. As a result of this inventory, we concluded that two separate parcels, totaling approximately 14,000 acres, do in fact meet these criteria and should be considered for protection as Lands with Wilderness Characteristics.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Willow Creek WSA (Adjacent Units) proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Willow Creek WSA (Adjacent Units) unit is made up of two separate blocks of contiguous roadless acres totaling approximately 14,000 acres. BLM's Manual 6310 states that the size criteria for Lands with Wilderness Characteristics can be met for units less than 5,000 acres when "they are contiguous with lands which have been formally determined to have wilderness or potential wilderness values". Not only are these two units contiguous with lands that have been formally determined to have wilderness values and are currently being managed to protect these values, each individual unit meets the size criteria separately—the Twin Wash unit is 5,900 acres and the Moosehead Mountain unit contains 8,100 acres.

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).

The Wilderness Society proposes the following boundaries for the Willow Creek WSA (Adjacent Units) to better meet the policies recited above. These proposals, and other assessments of boundary features, are detailed below and in the attached photo sheet for Willow Creek WSA (Adjacent Units).

The BLM's desktop inventory boundary for the Moosehead Mountain unit follows a signed closed route between Waypoints 1 and 2 on the attached map. This boundary follows a route that is not maintained and has been closed since at least the signing of the final White River Resource Management Plan and Record of Decision (RMP/ROD). The route lies within the Moosehead Mountain road closure area. As seen in Waypoint 2, the route is unmaintained, overgrown, and closed to vehicular traffic. Because this route does not qualify as a WIR, the boundary for this unit should move south to the gated but open WIR between Waypoints 3 and 5.

At Waypoint 5, a signed and locked gate prohibits motorized vehicle access from the Moosehead Mountain area. Beyond this gate, several routes exist which are becoming increasingly overgrown and which are no longer maintained by mechanical means. BLM's desktop inventory for the Moosehead Mountain unit drew a boundary along one of these routes, shown in Waypoints 5 through 12. This route is entirely reclaimed and is nearly impossible to distinguish without GPS assistance (Waypoints 7, 8). Besides being clearly unmaintained, the route shows no signs of construction using mechanical means. This route does not qualify as a WIR. Similarly, an unnamed route travels south from private lands to the north of the unit through Waypoint 13 and along the northern boundary of the Willow Creek WSA. This route has no public access and is not maintained. This route does not qualify as a WIR, and as such, the boundary for the potential LWC unit should be moved east to the corner formed by the private lands and the WSA boundary at Waypoint 14.

Between Waypoints 15 and 16, another route with no public access and no maintenance passes through the potential LWC unit. Because this route is unmaintained, it does not qualify as a road for boundary delineation purposes. The potential LWC unit should contain all public lands in this area, and the boundary should be moved north to include the small parcel of public lands north of the route between Waypoints 15 and 16.

A small communications facility is located at Waypoint 18. This facility is reached via an unmaintained route (Waypoint 17). This facility is well screened by surrounding trees and shrubs and does not detract from the naturalness of the unit as a whole at this time.

In the Twin Wash unit to the south and west of the Willow Creek WSA, several routes exist which may have precluded this area from WSA designation in 1980. However, over the intervening years many of these routes have naturally reclaimed for lack of mechanical maintenance. BLM 1518 travels south from near Waypoint 19 to a dead-end at an antiquated well pad at Waypoint 20. This dry well has been abandoned since 1970 and is no longer being maintained or used. However, BLM 1518 does seem to get some maintenance. For this reason, we have opted to cherrystem BLM 1518 to the abandoned well pad. At Waypoint 21, a spur route heads northwest off of BLM 1518. As seen in Waypoints 22 and 24, this route is being reclaimed by large sagebrush and shows no signs of maintenance. The route is impassable to passenger vehicles and does not appear to be regularly used in any way. This route is not a WIR and should be left within the unit.

At Waypoint 19, a BLM route travels west and south, generally running parallel to the southern boundary of the Willow Creek WSA. At Waypoint 27, the route is overgrown with grasses, yet is still passable to passenger vehicles. The character of the route changes significantly as it crosses West Twin Wash at Waypoint 29. On the eastern side of this wash, the route has large shrubs growing in the roadbed and shows no signs of regular maintenance (Waypoints 30, 31). By Waypoint 32, the route is almost completely indistinguishable from the surrounding terrain, and by Waypoint 33, the route disappears entirely. Because this route appears to be unmaintained beyond Twin Wash, we have opted to cherrystem the route to the western banks of the wash, beyond which its character changes to a decidedly non-maintained one.

After incorporating the boundary changes listed above to the proposed Willow Creek WSA (Adjacents Unit) LWC, it totals 14,000 acres—the 8,100-acre Moosehead Mountain unit in the north combined with the 5,900-acre Twin Wash unit in the south. Both individually and as adjacent units to the Willow Creek Wilderness Study Areas, these units meet the size criteria for a Lands with Wilderness Characteristics.

II. Willow Creek WSA (Adjacent Units) LWC is primarily affected by the forces of nature.

The BLM's 1980 *Final Wilderness Study Area Report* found that the Willow Creek area "appears to be natural with a few minor imprints of man in the form of ways and trails" and that "[t]hese imprints are growing over in most instances" (p. 35). Not only is the Willow Creek WSA primarily affected by the forces of nature, but the adjacent units of Twin Wash and Moosehead Mountain contain apparent naturalness as well. Moosehead Mountain is a ridgetop parcel of aspen stands, rolling sagebrush draws, and wide open views in all directions. The imprints of man within the unit are limited to closed and naturally reclaiming vehicle routes, as well as a small communications site near the top of Moosehead Mountain itself. Because much of the Moosehead Mountain unit has been closed to motorized vehicle travel since at least 1997 (Waypoint 5), the routes that remain in the unit are largely overgrown and are recovering naturally (Waypoint 8, 17); none of the routes within the motorized closure area are being maintained (Waypoint 10). The small communications facility atop Moosehead Mountain is not substantially noticeable, particularly when considered in context of the overall unit size and topography. In the Twin Wash unit, imprints of man are limited to grazing infrastructure (fencing) and rapidly recovering vehicle routes. The most prominent vehicle route in the unit is the unnamed BLM route which parallels the southern boundary of Willow Creek WSA between Waypoints 19 and 33. This route appears to get some use, primarily on its western end; however, after crossing West Twin Wash near Waypoint 29, the routes character distinctly shifts to an unmaintained one with little use. The route is often difficult to distinguish because of its overgrown and revegetated character and the route dead-ends near Waypoint 33, where it disappears entirely. This route does not meet the criteria for a WIR, and is not substantially noticeable. Both the Twin Wash and Moosehead Mountain parcels, which make up the Willow Creek WSA (Adjacent Units) proposed LWC, are apparently natural to the casual visitor and are primarily affected by the forces of nature.

III. Willow Creek WSA (Adjacent Units) LWC provides outstanding opportunities for solitude and primitive recreation.

The BLM White River Field Office's assessment of the opportunities for solitude and primitive recreation within the Willow Creek WSA stated that:

> *The relatively large size of the unit gives individuals room to disperse themselves. The highly dissected terrain provides ample topographic screening and would enable visitors to isolate themselves from others in the unit. Numerous vistas also enhance a feeling of solitude. Taken cumulatively, the opportunities for solitude are outstanding.*
>
> *-BLM Intensive Wilderness Inventory: Final Wilderness Study Areas, 1980*

The Willow Creek WSA (Adjacent Units) proposed LWC inherits these characteristics while also providing other outstanding opportunities for solitude. The high flat mesa of Moosehead Mountain is an area that has little public access. Because routes into the unit are closed off by private lands to the north and east, and by the Willow Creek Wilderness Study Area to the south, solitude is easily found by anyone who ventures into the unit. The high dome of Moosehead Mountain is a wild and isolated location. The small aspen groves and high shrubs in this area screen the visitor from others. A short walk or horseback ride along the sagebrush shelves near the northern boundary will reward the visitor with a sense of isolation and solitude that is similar to those found in Dinosaur National Monument just to the north. In Twin Wash, the deep, shady canyons and wild pinyon-sided draws shelter the visitor offer amazing solitude;

these numerous canyons and draws provide countless hidden alcoves and shady retreats where the visitor can easily find a profound and special solitude.

Opportunities for primitive recreation in the Willow Creek WSA (Adjacent Units) proposed LWC include hunting, hiking, backpacking, horseback riding, rock climbing, geology, star-gazing, and bird-watching. The BLM White River Field Office's assessment of the primitive and unconfined recreational opportunities of the Willow Creek WSA included the following:

> *The outstanding scenery, unusual geology and big-game wildlife values of the unit contribute to a variety of primitive and unconfined recreational opportunities. These include hunting, hiking, photography, and scenic and wildlife viewing. The cumulative effect of these resources give the unit outstanding opportunities for primitive and unconfined recreation.*

-BLM Intensive Wilderness Inventory: Final Wilderness Study Areas, 1980VIII. Willow Creek WSA (Adjacent Units) LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found Willow Creek WSA (Adjacent Units) proposed LWC to contain supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. The most outstanding of these are the hunting opportunities in the region. The Willow Creek WSA (Adjacent Units) LWC is unique in that it hosts both prime summer and winter habitats for elk. The Moosehead Mountain area is important summer concentration area for elk and provides invaluable production areas. In the lower elevations of the unit, a large winter concentration area for elk is found. Numerous migration corridors travel between these two habitat types and north into the Blue Mountain area around Dinosaur National Monument. Because of this unique variety of habitats, the area is known as one of Colorado's most prized elk hunting locations. The unit is located in Colorado's Game Management Unit (GMU) 10. This unit is a totally restricted elk hunting area and is managed for trophy bulls. Sportsmen can wait years for the opportunity to hunt this highly valued GMU, and anyone who gets the opportunity to hunt the area has the opportunity to bag the bull of their lifetime. Mule deer are also scattered throughout the area where they summer in the higher elevations around Blue Mountain.

In addition to the regionally significant hunting opportunities of the unit, the Willow Creek WSA (Adjacent Units) proposed LWC is also likely to contain outstanding cultural and paleontological resources. According to the BLM, twelve significant fossil-bearing formations are found in the unit—the same formations that have proven to be a treasure-trove of nationally significant fossils and are the original resource for which Dinosaur National Monument was created to protect. Additionally, numerous documented and undocumented cultural resource sites exist in the unit. Lithic scatters are easily found, and petroglyphs and granaries can be found along the sandstone cliffs in many of the long draws which break south off of Moosehead Mountain and the Skull Creek Rim.

Colorado Parks and Wildlife has identified important greater sage-grouse habitat covering almost the entirety of the Moosehead Mountain portion of the proposed LWC. The greater sage-grouse is a highly threatened bird that was recently found to warrant protections through the Endangered Species Act. Protecting the wilderness characteristics of

the area will undoubtedly help ensure that the area's quality greater sage-grouse habitat is protected and that the bird continues to thrive in the area.

Finally, the Willow Creek WSA (Adjacent Units) unit is located within the Dinosaur Lowlands Master Leasing Plan (MLP) area, which was accepted by the BLM as a MLP in 2011.

Summary Conclusion

Our on-the-ground inventory of the Willow Creek WSA (Adjacent Units) proposed LWC shows that the BLM missed an opportunity to identify the full acreage of wilderness-quality lands surrounding and abutting the Willow Creek Wilderness Study Area, which is currently being managed for the protection of its wilderness characteristics by the BLM. In addition to the Moosehead Mountain unit that the BLM did identify as potentially containing wilderness characteristics, the Twin Wash unit to the west of the WSA has obvious and significant wilderness characteristics. Both these units should be considered together, as their 14,000 acres abut the WSA and inherit the wilderness characteristics located therein.

Our inventory has documented the suggested boundaries as well as the wilderness characteristics located in the Willow Creek WSA (Adjacent Units) proposed LWC. It is imperative that the BLM give this unit a full inventory to document these and any additional outstanding wilderness characteristics before any land management decisions are made that might negatively affect these resources.

This overview provides new information, including maps and photos, documenting that the 14,000-acre Willow Creek WSA (Adjacent Units) meets all wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Willow Creek WSA (Adjacent Units) Photopoints

The following photographs correspond with the numbered icons on the attached Willow Creek WSA (Adjacent Units) map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Willow Creek Adjacents (2) - W

Willow Creek Adjacents (4) - NNE

Willow Creek Adjacents (5) - ENE

Willow Creek Adjacents (6) - S

Willow Creek Adjacents (7) - W

Willow Creek Adjacents (8) - WNW

Willow Creek Adjacents (9) - W

Willow Creek Adjacents (10) - S

Willow Creek Adjacents (11) - S

Willow Creek Adjacents (12) - N

Willow Creek Adjacents (17) - W

Willow Creek Adjacents (18) - NE

Willow Creek Adjacents (21) - W

Willow Creek Adjacents (22) - SW

Willow Creek Adjacents (23) - SSW

Willow Creek Adjacents (24) - SW

Willow Creek Adjacents (25) - NE

Willow Creek Adjacents (26) - NE

Willow Creek Adjacents (27) - ESE

Willow Creek Adjacents (28) - N

Willow Creek Adjacents (29) - NE

Willow Creek Adjacents (30) - SE

Willow Creek Adjacents (31) - S

Willow Creek Adjacents (32) - S

Willow Creek Adjacents (33) - N

Willow Creek Adjacents (34) -

Willow Creek Adjacents (35) - Rec

Willow Creek Adjacents (36) - Natural

Willow Creek Adjacents (37) - Solitude

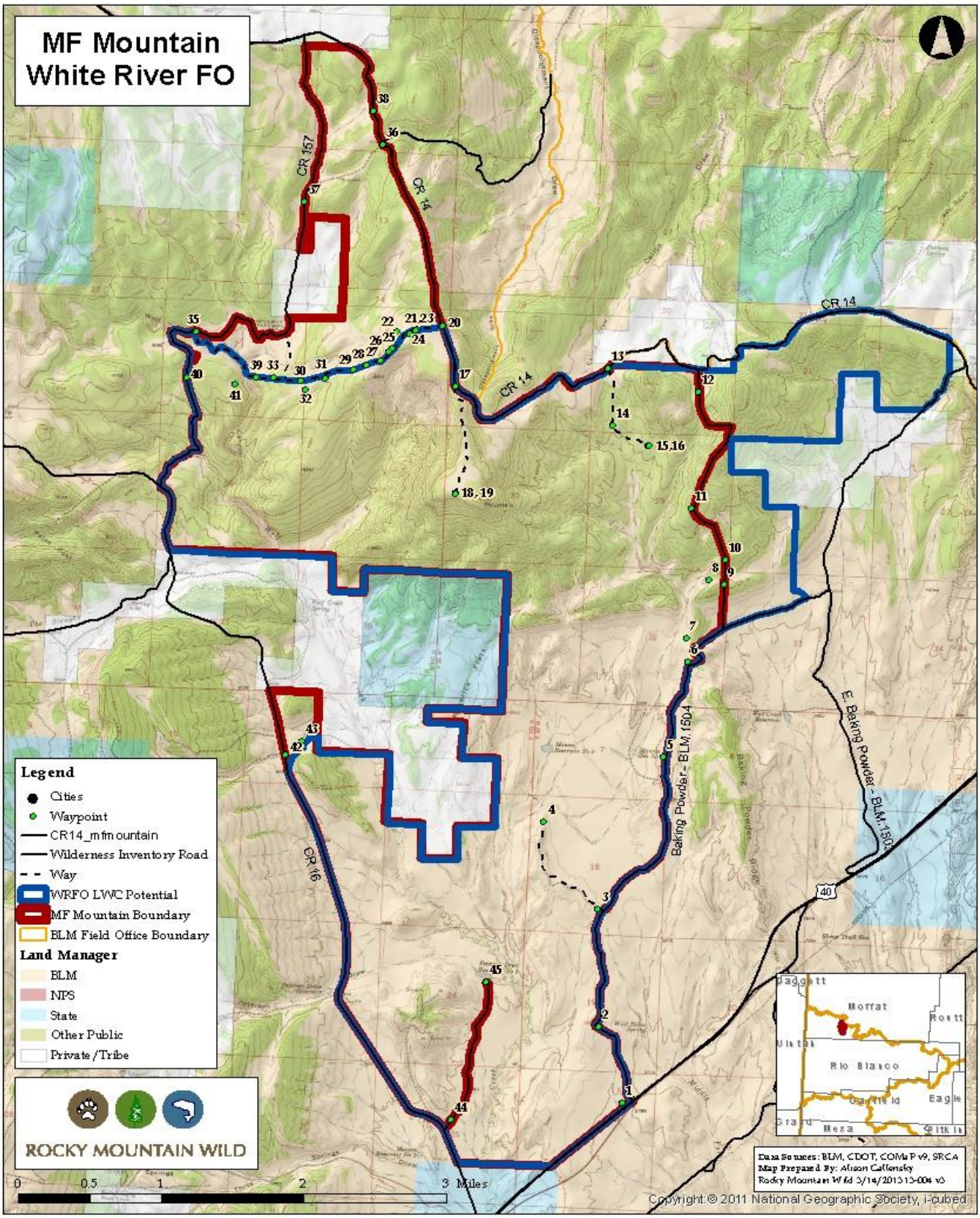
Willow Creek Adjacents (38) - Solitude

Willow Creek Adjacents (39) - Solitude

Lands with Wilderness Characteristics Recommendations: MF Mountain

MF Mountain, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


MF Mountain
White River FO
CR 157
CR 14
CR 14
CR 14
CR 16
Baking Powder - BLM 1604
E. Baking Powder - BLM 1604
40
Legend
Cities
Waypoint
CR14_mfmountain
Wilderness Inventory Road
Way
WRFO LWC Potential
MF Mountain Boundary
BLM Field Office Boundary
Land Manager
BLM
NPS
State
Other Public
Private/Tribe
ROCKY MOUNTAIN WILD
0
0.5
1
2
3 Miles
Jaggett
Moffat
Routt
Uintah
Rio Blanco
Eagle
Grand
Mesa
Pitkin
Data Sources: BLM, CDOT, COMaP v9, SRC4
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 3/14/2013-004 v3
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Overview and Boundary Delineation:

The enigmatically-named MF Mountain unit is a unit with two personalities. At the lowest elevations, arid and windswept flats provide wide views in every direction. Ephemeral streambeds course across the flaky soils and crumbling badlands provide the only topographical relief. These lowlands provide habitat for greater sage-grouse, white-tailed prairie dogs, and summer habitat for mule deer. Above the flats, the iron-red slopes of MF Mountain are speckled with pinyon and juniper. Broken slopes rise high above the plains below, providing a colorful foreground for the endless views to the south. This unit is the source of Wolf Creek—a prominent drainage that empties into the White River nearly 20 miles to the south.

The MF Mountain proposed Lands with Wilderness Characteristics (LWC) is an 8,900-acre unit located north of US Highway 40 and just five miles south of Dinosaur National Monument. The unit is bounded by Colorado State lands and US Highway 40 on the south; BLM 1504 and an unnamed BLM road on the east; Moffat County Road 14 on the north; and Moffat County Road 157, Moffat County Road 16, and private and state lands on the west. The MF Mountain unit lies at elevations between 5700' and 7082' and lies entirely within Moffat County.

MF Mountain was identified by BLM's White River Field Office (WRFO) as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In the report, the BLM identified an area of 9,100 acres around MF Mountain (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer that doesn't differentiate between those roads that qualify for Wilderness Inventory Roads under BLM Manual 6310 and those that do not. Therefore, the boundaries proposed by the BLM in the LWC inventory report contain small inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During May and July of 2012, The Wilderness Society visited the MF Mountain area to conduct an in-depth, on-the-ground field inventory of the MF Mountain LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made. This field inventory resulted in several proposed boundary changes, while also documenting the condition of numerous roads and routes, both within the unit and along the periphery of its boundary. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. MF Mountain proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The MF Mountain unit comprises a block of 8,900 contiguous roadless acres. 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). Our inventory of the area revealed that, in several locations, BLM's proposed boundaries for this unit are not based on Wilderness Inventory Roads or other qualifying features as defined in BLM policies. We have suggested several changes to these boundaries below, which in turn would decrease the size of the unit to 8,900 acres from BLM's proposed 9,100 acre size. These boundary adjustments are detailed below. All photopoints referred to in the narrative can be seen in the attached photosheet for MF Mountain.

The eastern boundary of the unit is formed by BLM 1504, which travels north from US Highway 40 to an intersection with BLM 1503 further to the north and east. This route is signed, numbered, constructed using mechanical means, and shows signs of maintenance to ensure regular and continuous use (Waypoint 1).

At least three individual routes spur off of BLM 1504 and head west or north into the MF Mountain unit. At Waypoint 2, a very short spur route leads for around one-tenth of a mile to a dead-end (Waypoint 2). This route shows no signs of construction using mechanical means and is not maintained (Waypoint 2); this route does not qualify as a WIR. At Waypoint 3, another route spurs off of BLM 1504 to the northwest. This route appears to have been created by the passage of vehicles and shows no signs of construction using mechanical means. The route fades out and dead-ends at a small hilltop along the ridge (Waypoint 4) and is not maintained. This route does not qualify as a WIR and should be left within the unit. The third spur departs BLM 1504 at Waypoint 6 and heads north into the unit. This route shows no signs of construction using mechanical means (Waypoint 6), and the overgrowth and biological soils in the track indicate that this route sees little to no use and is not maintained (Waypoint 7, Waypoint 8).

The BLM's desktop inventory boundary follows BLM 1504 to its intersection with private lands near BLM 1503. However, a route departs BLM 1503 just west of the private property line and follows a prominent fence line almost directly north to its terminus with Moffat County Road 14. This route, visible in Waypoints 9 through 12, is very rough and is nearly impassable to passenger vehicles in several locations. However, it follows a fence line that seems to have been recently repaired and is still functioning (Waypoint 11). We have opted to draw the boundary for this unit along this fence line road. If, in fact, this road is not maintained, the boundary should be moved east to the private property line as suggested in the BLM's desktop inventory boundary.

Along the northern boundary of the proposed MF Mountain LWC unit, three routes are found which lead south into the unit. The first of these is located at Waypoint 13. This route shows no signs of original construction using mechanical means; at its onset, the elevation of its roadbed is significantly higher than the bladed and maintained CR 14 (Waypoint 13) and the median between the tracks has significant growth. At Waypoint 14, a small, antiquated stock pond is found

that may have been the original purpose for this route. This stock pond is now so overgrown and silted-in that it blends seamlessly into the surrounding terrain (Waypoint 14). Just south of this relic stock pond, the route deteriorates so much that it is nearly indistinguishable (Waypoint 15). Because this route does not appear to have been constructed using mechanical means, and because it is clearly not maintained, it does not qualify as a WIR and should be left within the unit.

At Waypoint 17, a short route leads south to the summit of MF Mountain proper. This route may have been constructed at one point (Waypoint 17); however, once on the summit plateau it fades out into an unbladed and unmaintained two-track (Waypoint 18); because of this lack of maintenance, the route does not qualify as a WIR and has been left in the unit.

The BLM's desktop inventory boundary departs CR 14 at Waypoint 20 and heads west to an intersection with CR 157. At the onset of this boundary line, the route is faint and overgrown (Waypoint 20). The vegetation in the median of the route is roughly the same height and condition of the vegetation on either side of the route (Waypoint 21), which indicates that this route was never constructed using mechanical means; clearly it is not being maintained. A right fork of this route shows no signs of construction or maintenance (Waypoint 22), while the left (south) fork seems to be a user-created route as it squeezes through tall juniper trees (Waypoint 24) where a blade has not passed, and down a slope with no visible cut banks or other signs of mechanical construction (Waypoints 25, 26, and 27). Below the hill, at Waypoint 27, the route is overgrown and unbladed, and at Waypoint 29 the route is so narrow that it prohibits the passage of any vehicles except for small OHVs; the route here is also clearly not constructed using mechanical means nor is it maintained to ensure regular and continuous use. At Waypoint 33, the route has large sagebrush growing directly in the track, and there is no tread or other signs of use. Finally, as the boundary approaches CR 157 between Waypoints 34 and 35, it is drawn directly in the bottom of the narrow slot of Wolf Creek Canyon where there is no route whatsoever. This route, between Waypoints 20 and 35, does not qualify as a WIR and as such the BLM's desktop inventory boundary line should be deleted here and moved to the north.

At Waypoint 30, two spur routes head in a generally eastern direction off of the non-WIR route described in the paragraph above. Like the route from which they originate, these routes are neither constructed nor maintained and do not qualify as WIRs (Waypoints 30, 31, and 32).

The northern boundary of the MF Mountain unit should reach as far north as the intersection between CR 14 and CR 157. Two routes leave CR 14 just south of this intersection and head southwest; neither of these routes is currently maintained. The route between Waypoints 36 and 37 was not constructed using mechanical means; as seen in Waypoint 37, the route is completely reclaimed and indistinguishable from surrounding terrain. The route beginning at Waypoint 38 may once have been constructed through the thick sagebrush but is now overgrown and appears only to be used occasionally (Waypoint 38) to access a small stock pond near CR 157.

The western boundary proposed here largely follows the BLM's desktop inventory boundary. The boundary line follow CR 157 to its intersection with CR 16, then juts west and south along private and state boundary lines, eventually returning to CR 16. Waypoints 42 and 43 show an unmaintained route that does not qualify as a WIR—the boundary here should stay on the private property line to the north rather than follow this short section of unmaintained road.

At Waypoint 44, we have opted to cherrystem out of the unit a roughly one and one-quarter mile road that leads to the developed stock pond at Waypoint 45. This road appeared to have regular and continuous use to access the pond and also appeared to have been recently maintained.

After incorporating the boundary adjustments detailed above and shown on the attached map, the MF Mountain unit contains 8,900 contiguous roadless acres of BLM lands and thus meets the size criterion as outlined in BLM Manual 6310.

II. MF Mountain proposed LWC is primarily affected by the forces of nature.

To the casual visitor, MF Mountain appears primarily affected by the forces of nature. Small water impoundment structures in the unit (primarily in the low elevations around Maverick Flats) are no longer functioning or are so overgrown or silted-in as to appear natural (Waypoints 5, 14 and 16). Existing user-created and unmaintained vehicle routes do exist along the periphery of the unit; however, as shown in the narrative above and in the attached photosheet, these features are in various states of deterioration and most are re-vegetating naturally—neither alone or collectively do they detract from the overall naturalness of the unit.

MF Mountain is unique in that it contains a large swath of low elevation roadless acreage of a generally flat topography that appears natural and affected primarily by the forces of nature (Waypoint 5). In a region where this type of landscape is often encumbered by oil and gas development or significant ranching infrastructure, large tracts of naturally appearing low elevation sagebrush and saltbush terrain is especially valuable and provides the visitor with a unique experience of naturalness found in decreasingly few locations in the region.

III. MF Mountain proposed LWC provides outstanding opportunities for solitude and primitive recreation.

With such close proximity to Dinosaur National Monument, opportunities for solitude at MF Mountain are exceptional. Whether it occurs in the low elevation flats in the south, or in the steep gullies and draws peeling off of MF Mountain in the north, the casual visitor is likely to have few, if any, encounters with other human beings or other human impacts. A short walk off of BLM 1504 towards Maverick Flats lets the visitor experience how small a human being can feel when surrounded by wide open expanses without other human intrusion. Further north, a visitor can easily hide away in the folds and creases of MF Mountain, with no sounds audible but his or her own breathing. In our two visits during May and July of 2012, not another human being was encountered within this unit.

The primitive recreational opportunities on MF Mountain are unique and outstanding. A visitor has an opportunity to enjoy outstanding hiking, backpacking, scrambling, photography, and bird-watching. Several deteriorating vehicle tracks provide nice opportunities to access primitive campsites with outstanding views to the south. The variety of terrain—the narrow depths of upper Wolf Creek Canyon, the lonesome views from atop MF Mountain, and the unimpeded spaces to the west of Baking Powder Ridge—affords the casual visitor opportunities to enjoy an array of landscapes and aesthetic experiences with just a little effort.

VIII. MF Mountain proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found MF Mountain proposed LWC to contain several supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. The lower half of the unit lies within the Lower Wolf Creek White River Field Office's Wolf Creek Ferret Management Area (Wolf Creek MA). The Wolf Creek MA was delineated as part of the WRFO's Resource Management Plan in 1997 and is the site of extensive efforts to reestablish the black-footed ferret in Colorado. The black-footed ferret is possibly the rarest mammal in North America and one of the rarest mammals in the world; it was one of the first species offered protection under the Endangered Species Act of 1973. The Wolf Creek MA was chosen as a location for black-footed ferret reintroductions for several reasons which coincide with its wilderness character; these include its current land-use practices, the fact that "it has little ongoing or prospective mineral development", and its healthy white-tailed prairie dog colonies (*A Cooperative Plan for Black-Footed Ferret Reintroduction and Management,* 2001). Over 4,000 acres of black-footed ferret release sites exist within the MF Mountain unit.

Rare birds also occupy the MF Mountain unit. The greater sage-grouse—a bird recently found eligible for protection under the Endangered Species Act—makes the unit home. At least one lek is found within the unit. In addtion, over 2,000 acres of the lower elevations have been classified by Colorado Parks and Wildlife as Preliminary Priority Habitat for this amazingly unique bird, and around 4,000 acres has been classified as Preliminary General Habitat. Protecting the wilderness values of this area will undoubtedly help to ensure that this sensitive bird continues to have the habitat it requires to sustain itself into the future.

Finally, the MF Mountain unit lies within the Dinosaur Lowlands Master Leasing Plan area that was accepted by the BLM in 2011.

Summary Conclusion

Our extensive on-the-ground inventory of the MF Mountain unit shows that the BLM was correct in identifying this area as one that could qualify as Lands with Wilderness Characteristics. The boundaries created through the BLM's desktop inventory of the MF Mountain unit are largely correct, except for two locations in the northeast and northwest corners of the unit; we have proposed changes to both of these boundaries and explained the rationale for doing so above. At 8,900 acres in size and with a unique variety of topographies, unique opportunities for solitude and primitive and unconfined recreation are plentiful. Human impacts to the unit are slight and do not affect the overall naturalness of the unit.

Our inventory has documented necessary boundary adjustments as well as the wilderness characteristics of the area. It is imperative that the BLM now do the same, before any land management decisions are made that might degrade these qualities

This overview provides new information, including maps and photos, documenting that the 8,900 acre MF Mountain unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

MF Mountain Photopoints

The following photographs correspond with the numbered icons on the attached MF Mountain unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

MF Mountain (1) - N

MF Mountain (2) - W

MF Mountain (3) - Nw

MF Mountain (4) - N

MF Mountain (5) - W

MF Mountain (6) - N

MF Mountain (7) - N

MF Mountain (8) - E

MF Mountain (9) - S

MF Mountain (10) - N

MF Mountain (11) - N

MF Mountain (12) - S

MF Mountain (13) - S

MF Mountain (14) - SSW

MF Mountain (15) - E

MF Mountain (16) - W

MF Mountain (17) - S

MF Mountain (18) - N

MF Mountain (19) - SSE

MF Mountain (20) - S

MF Mountain (21) - SSW

MF Mountain (22) - WNW

MF Mountain (23) - S

MF Mountain (24) - SE

MF Mountain (25) - SE

MF Mountain (26) - S

MF Mountain (27) - NNE

MF Mountain (28) - ENE

MF Mountain (29) - E

MF Mountain (30) - E

MF Mountain (31) - E

MF Mountain (32) - SSE

MF Mountain (33) - W

MF Mountain (36) - S

MF Mountain (37) - NE

MF Mountain (38) - S

MF Mountain (40) - ENE

MF Mountain (41) - SE

MF Mountain (42) - NNE

MF Mountain (43) - E

MF Mountain (44) - NE

MF Mountain (45) - N

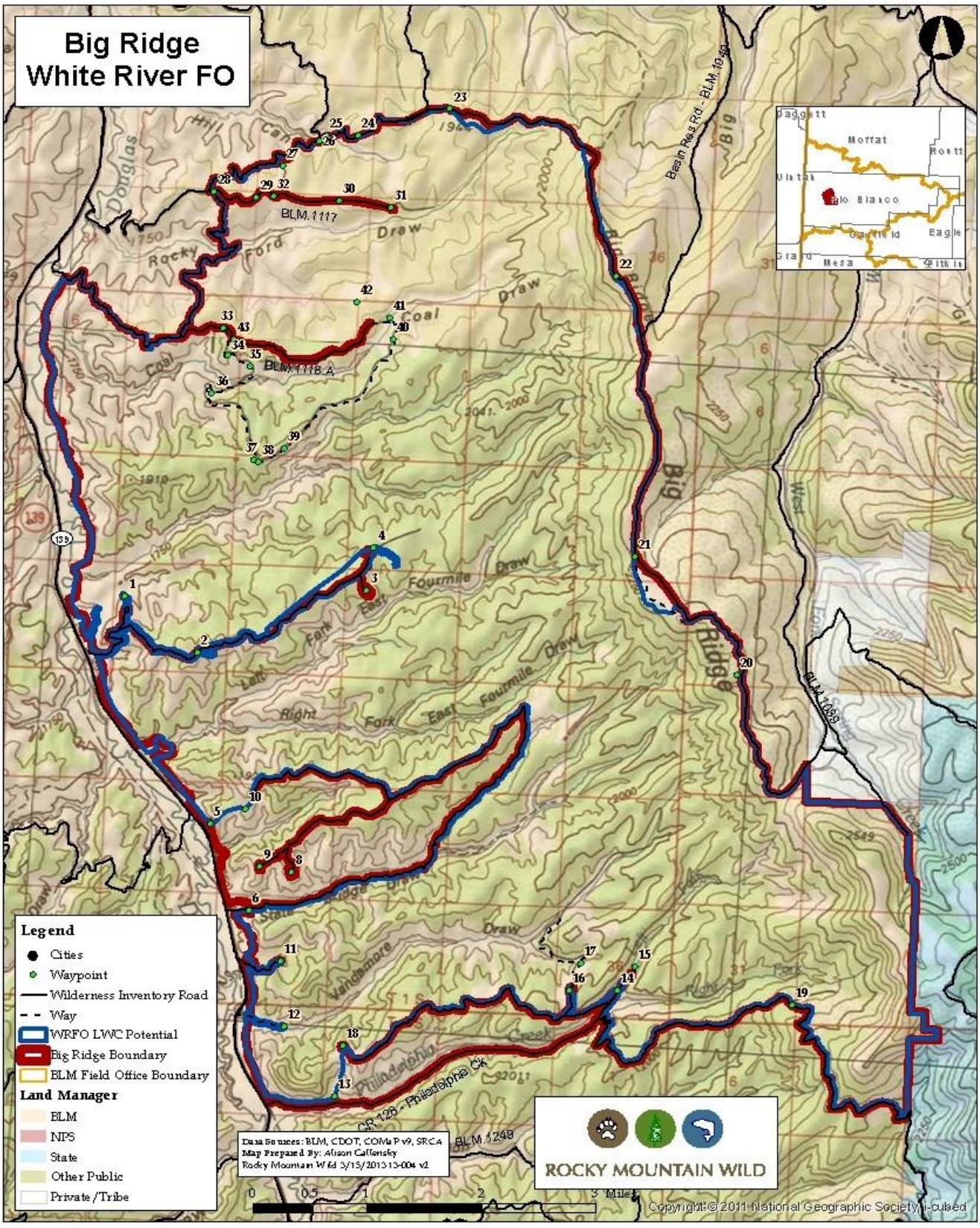
MF Mountain (46) - Naturalness

MF Mountain (47) - Naturalness

Lands with Wilderness Characteristics Recommendations: Big Ridge

Big Ridge, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Big Ridge
White River FO
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Big Ridge Boundary
BLM Field Office Boundary
Land Manager
BLM
NPS
State
Other Public
Private /Tribe
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 3/15/2013 13-004 v2
ROCKY MOUNTAIN WILD
Copyright © 2011 National Geographic Society, i-cubed
Fourmile Draw
Coal Draw
Rocky Ford Draw
Big Ridge
BLM.1117
BLM.1118.A
BLM.1249
Moffat
Routt
Rio Blanco
Garfield
Eagle
Mesa
Pitkin

Overview and Boundary Delineation:

Covered by a patchwork of pinyon-juniper woodland and semi-desert shrubland, Big Ridge rises above an array of attendant hills, remote and indifferent. A series of drainages dissect the ridge, falling steeply at first, and then winding placidly through flat-bottomed draws of terraced sandstone, before finally joining Douglas Creek. To the southwest, Oil Spring Mountain and Texas Mountain swell beneath green mantles of pinyon pine and one-seed juniper; to the southeast, the stunning Cathedral Bluffs draw a firm line across the horizon.

The blended ecosystems host a variety of animal species, including mountain lions and coyotes, deer, rattlesnakes, golden eagles, blue-gray gnatcatchers, and American kestrels. Mountain-mahogany, bitterbrush, junegrass, and indian ricegrass shelter cottontail rabbits, collared and side-blotched lizards, and pinyon mice. In spring and early summer, a blush of color spreads through the sageland, as paintbrush, arrowleaf balsamroot, and prickly pear bloom.

In addition to this abundance of flora and fauna, the unit overlaps with the Canyon Pintado National Historic District.

Opportunities for backpacking, hunting, hiking, and photography are excellent, and the lack of roads within the unit ensures a solitary experience. Wildflower viewing opportunities are also quite good, and the possibility of stumbling across one of the area's many Fremont Culture archaeological sites adds a touch of mystery and suspense to any excursion in the area.

Several archaeological sites developed for the public use are located along the eastern boundary. Other archaeological sites are as yet undiscovered but many are believed to exist. Both the recognized and potential archaeological value of the area, along with the unit's proximity to the Canyon Pintado National Historic District, firmly establishes the historical and archaeological significance of the area.

Big Ridge proposed Lands with Wilderness Characteristics (LWC) unit is a 27,300-acre unit located just east of Colorado State Highway 139. The unit is bounded on the west by CO 139 and the Canyon Pintado National Historic District, on the north by Rio Blanco County Road 138 and unnamed BLM roads, on the east by lands owned by the State of Colorado as well as unnamed BLM roads atop Big Ridge, and on the south by Rio Blanco County Road 128.

The Big Ridge unit was inventoried by the BLM as part of the 2012 *Non-WSA Lands with Wilderness Characteristics Update* which found the unit to be primarily affected by the forces of nature, and possessing outstanding opportunities for solitude and primitive and unconfined recreation. The report concluded that the Big Ridge unit does possess the criteria for wilderness characteristics.

During September of 2012, The Wilderness Society visited the Big Ridge area to conduct an in-depth, on-the-ground field inventory of the potential LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

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 found that the BLM's boundaries for the Big Ridge unit were largely accurate and met the criteria as laid out in Manual 6310. Our inventory did find the presence of two Wilderness Inventory Roads in the northern portions of the unit which we have cut out or cherrystemmed out of the unit (see attached map). Additionally, we have proposed boundary adjustments to portions of the unit along State Bridge Draw and Philadelphia Creek in order to better meet the criteria for boundary delineation laid out in BLM Manual 6310. These boundary adjustments are detailed below (and in the attached photosheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Big Ridge proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Big Ridge unit comprises a block of 27,300 contiguous roadless acres. BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying for wilderness characteristics (Wilderness Inventory Road). 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).

The Wilderness Society has found that the BLM's desktop inventory boundary for the Big Ridge unit largely mirrors the on-the-ground situation and thus our recommended boundary adjustments for this unit are relatively minor. However, there are two routes leading into the northern portion of the unit—one in Rocky Ford Draw and the other in Coal Draw—that we found meet the criteria for consideration as WIRs and thus were cherrystemmed into the unit; we also have cherrystemmed the oil and gas well pad access roads above State Bridge Draw, rather than cutting them out of the unit entirely. Similarly, we have cherrystemmed the one oil and gas well pad access road on the ridge above Philadelphia Creek, rather than cutting that entire ridge out of the unit entirely. These changes are described in detail below.

To the north and above the Left Fork East Fourmile Draw, a number of oil and gas well pads are currently active. These pads (Waypoints 1 through 4) are linked together by a series of maintained access roads; these roads should be cherrystemmed out of the unit.

At Waypoint 5, the BLM's desktop inventory boundary for this unit cuts directly up a steep hillside to connect with the oil and gas well pad access road at Waypoint 10. This short boundary segment follows no visible route or road or other feature that meets the definition of a Wilderness Inventory Road. This boundary should be deleted and the maintained road which travels up State Bridge Draw and leads to the oil and gas well pads at Waypoints 8, 9, and 10 should be cherrystemmed out of the unit. These features are not significant enough to detract from the naturalness of the unit as a whole, and thus a cherrystem is more appropriate than cutting these ridges and respective slopesides from the unit entirely.

A producing well pad with a currently maintained access road is located at Waypoint 11. This short road should be cherrystemmed into the unit. Further south, at the mouth of Vandamore Draw, a plugged and abandoned well pad

exists at Waypoint 12. This well has been plugged and abandoned since 1994 and the road does not appear to be maintained. This route should be left in the unit as it does not meet the criteria for a WIR.

At Waypoint 13, the BLM's boundary for this unit travels directly north up the center of a short drainage to the producing well pad at Waypoint 18. This boundary follows no road or other qualifying feature for boundary delineation purposes. The boundary should instead follow the north side of CR 128 and the oil and gas well pad access road ending at Waypoint 18 should be cherrystemmed out of the unit.

A short route heads northeast up the Left Fork of Philadelphia Creek at Waypoint 14 towards a plugged and abandoned well at Waypoint 15. This route is not maintained and should be left within the unit.

A longer route departs BLM 1121A near Waypoint 16 and heads over the ridge and into the upper reaches of Vandamore Draw. This route once provided access to three well pads along this route; all of these wells are currently non-producing, and the two well pads in Vandamore Draw are dry and have long been abandoned. The route leading into Vandamore Draw after the well pad at Waypoint 16 is no longer being maintained; large shrubs grow directly in the road bed and the surface of the route is severely eroded. The route does not qualify as a WIR and should be left within the unit.

Near the southeast corner of the unit, a short route can be found leading into the top of the Right Fork Philadelphia Creek. As seen in Waypoint 19, this route receives little to no use, is clearly not maintained, and does not qualify as a WIR.

In the northern portion of the unit, two routes depart CR 138 and head east into the unit. The northernmost of these routes begins at Waypoint 28. At its onset, this route is signed (BLM 1117) and maintained. The route is clear of all vegetation and appears to have been recently bladed (Waypoint 29). Although the route degrades in condition by Waypoint 30, it appears to be maintained as far as the dead-end and primitive campsite at Waypoint 31. Although this route was not cherrystemmed in the BLM's desktop inventory of this unit, it appears to meet the criteria for a WIR and should be cherrystemmed out of the unit.

BLM 1118A departs CR 138 and heads east along the north rim of Coal Draw. This route appears to have been recently bladed to as far as the intersection of routes just south of Waypoint 42. The route forks here, with one fork heading north towards the closed well pad access road at Waypoint 42, and another fork looping southwest and then north back towards the beginning of the route near Waypoint 33. The northern fork, as mentioned above, is currently signed as closed to motorized vehicles and has access blocked via a temporary fence (Waypoint 42). This route may have been constructed to provide access to a well pad just beyond Waypoint 42; however, this well is listed as dry and abandoned, and no access or maintenance is currently ongoing at the site. This route should remain in the unit as it does not appear to qualify as a WIR. The eastern or southern fork, which forms a loop route along the southern rim of Coal Draw, appears to get some use from OHVs; however, the route is in exceedingly poor condition and is not maintained. The uppermost reaches of the route are rutted, eroding, and not maintained (Waypoint 42). As the route moves south and west, the route continues to deteriorate (Waypoint 40) and passage appears to be maintained solely by the passage of vehicles. By Waypoint 38, the route is ungraded, rutted, and difficult to follow, even on an OHV. At Waypoint 36, large shrubs can be seen growing in the roadbed, indicating a lack of maintenance. The route continues to show large ruts, severe erosion including trenches and loose boulders, and little indication of frequent use (Waypoints 35 and 34).

Because this route is not maintained using mechanical means, but rather solely by the passage of vehicles (OHVs), this loop route does not qualify as a WIR and should be left within the unit.

After incorporating the two new cherrystems listed above and shown on the attached map, as well as modifying the western boundary along State Bridge Draw and above Philadelphia Creek, the Big Ridge unit contains 27,300 contiguous roadless acres of BLM lands and thus meets the size criterion as outlined in BLM Manual 6310.

II. Big Ridge proposed LWC is primarily affected by the forces of nature.

The Big Ridge unit is primarily affected by the forces of nature and impacts of man are substantially unnoticeable. The unit is characterized by Big Ridge proper on the eastern end of the unit and drainages that run from Big Ridge west to Douglas Creek. Ridges that provide varied topography and an undulating landscape separate the drainages. Pinyon and juniper forests cover hillsides and mesas within the unit and the draws host a variety of native shrubs and forbs. A variety of wildlife inhabits the area, including deer, mountain lion and a variety of birds.

We agree with the BLM's assessment in their 2012 *Non-WSA Lands with Wilderness Characteristics Inventory Update* that the Big Ridge unit "is a large unit and the overall human modifications to the landscape are substantially unnoticeable, giving the area a highly apparent naturalness to the average visitor" (p.8). The Big Ridge unit's 27,000 roadless acres make it an unusual resource in the highly industrialized surrounding area. Human impacts to the area are primarily related to historic oil and gas drilling activity, as well as OHV use. All active oil and gas well pads and substantially noticeable routes have been cherrystemmed from the unit; the remaining routes are unmaintained, deteriorating rapidly, and do not affect the overall naturalness of the unit, particularly because of the unit's size. The dense pinyon and juniper forests (Waypoints 7 and 19), as well as the undulating topography (Waypoint 39), screen these deteriorating routes from view, granting the unit an apparent naturalness to the casual visitor.

The Big Ridge unit is primarily affected by the forces of nature, and contains only minor human impacts. These impacts do not affect the area's overall naturalness, either individually or cumulatively.

III. Big Ridge proposed LWC provides outstanding opportunities for solitude and primitive recreation.

The BLM's 2012 *Non-WSA Lands with Wilderness Characteristics Inventory Update* concluded that the "limited access, generally steep terrain, dramatic views of the Cathedral Bluffs, apparent naturalness, and lack of outside intrusions [in] the area presented an outstanding opportunity for solitude". Certainly, ample outstanding opportunities for solitude exist within the Big Ridge unit. One can find outstanding solitude by exploring the area's drainages such as Vandamore Draw, Right Fork of State Bridge Draw, East Fourmile Draw (including the Right and Left Fork) and upper Rocky Ford Draw. Outstanding opportunities for solitude exist along several ridges within the unit and at the base of Big Ridge. One can find solitude in the pinyon-juniper forests along the ridges, up against one of the unit's numerous small cliff bands, or in one of the many natural meadows within the unit. The area provides a quiet getaway from Highway 139 and explorations from within Canyon Pintado.

In addition to the easily experienced opportunities for solitude in the unit, Big Ridge also provides numerous opportunities for primitive and unconfined recreation. Hiking and backpacking up any of the named drainages peeling west off of Big Ridge provides a unique wilderness experience that is hard to find elsewhere in the vicinity. An excellent

example of the unit's outstanding opportunities for primitive and unconfined recreation would be to hike up Vandamore Draw about 2.25 miles, turn left up an unnamed side drainage and climb over the ridge to the Right Fork of State Bridge Draw. From here, one could continue to hike up the Right Fork drainage for around one mile and then find a way over to the Fourmile drainage, hiking down either the right or the left fork. The unit is easily experienced via hiking or horseback riding. Hunting is also popular in the unit. There are also outstanding opportunities for picnicking, photography, backpacking, nature study, and wildlife viewing.

The BLM's 2012 *Non-WSA Lands with Wilderness Characteristics Inventory Update* listed hunting, hiking, horseback riding, wildlife viewing, and photography as the outstanding opportunities for primitive and unconfined recreation present in the unit, while pointing out that the unit has "outstanding primitive recreational opportunities". It is clear that the Big Ridge unit possesses opportunities for solitude and primitive recreation that meet the criteria for consideration as a Lands with Wilderness Characteristics.

VIII. Big Ridge proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found Big Ridge proposed LWC to contain numerous supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected.

The Big Ridge area overlaps the Canyon Pintado National Historic District along the lower portion of the unit east of Douglas Draw. The Canyon Pintado National Historic District is dedicated to the Fremont culture, which used the area long ago. Evidence of the ancient dwellers is found in the form of rock art, lithic scatters, and other undocumented sites. Much of the Big Ridge area outside of Canyon Pintado National Historic District has not been inventoried for its archeological resources, but it is practical to assume that the ancient people used the area. The Colorado Office of Archaeology and Historic Preservation has identified at least 65 sites within the Big Ridge proposed LWC unit. Many other sites are likely to be associated with the Fremont culture. Because of the sensitive nature of the data managed by the Colorado Office of Archaeology and Historic Preservation, detail on the sites is not provided. But the type of sites can range from prehistoric – such as the Freemont culture sites – to historic sites related to early settlers and more recent activity.

In addition to the regionally significant cultural resources of the area, Big Ridge's large size and diverse topography support important wildlife values. Big Ridge is a key habitat for mule deer. In the summer, large mule deer utilize the upper reaches of the unit, primarily atop Big Ridge proper, while the lower elevations to the west are recognized by Colorado Parks and Wildlife as winter concentration areas and severe winter range for this highly valued species. A large mule deer migration corridor also crosses the unit. The unit also hosts populations of elk, black bear, and mountain lions.

Protecting the wilderness characteristics and roadless nature of this unit will help preserve these significant cultural and wildlife values.

Summary Conclusion

Our extensive on-the-ground inventory of the Big Ridge proposed LWC unit shows that the BLM was correct to determine in its 2012 *Non-WSA Lands with Wilderness Characteristics Inventory Update* that the Big Ridge unit has wilderness characteristics (p. 8). The area's 27,300 roadless acres provide outstanding opportunities for solitude and primitive and unconfined recreation, and have outstanding supplemental characteristics—including regionally significant cultural resources—whose protection would enhance the wilderness character of the area. Now that the BLM has recognized this area's wilderness characteristics, it should ensure that they are protected.

This report provides new information, including maps and photos, documenting that the 27,300-acre Big Ridge unit meets BLM's LWC criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Big Ridge Photopoints

The following photographs correspond with the numbered icons on the attached Big Ridge unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Big Ridge (7) - SSE

Big Ridge (14) - NW

Big Ridge (15) - S

Big Ridge (16) - NE

Big Ridge (17) - SW

Big Ridge (19) - NW

Big Ridge (20) - SSE

Big Ridge (21) - SSW

Big Ridge (22) - SW

Big Ridge (23) - E

Big Ridge (24) - NE

Big Ridge (25) - E

Big Ridge (26) - ENE

Big Ridge (27) - N

Big Ridge (28) - E

Big Ridge (29) - E

Big Ridge (30) - E

Big Ridge (31) - ESE

Big Ridge (32) - SW

Big Ridge (33) - S

Big Ridge (34) - NE

Big Ridge (35) - SE

Big Ridge (36) - NW

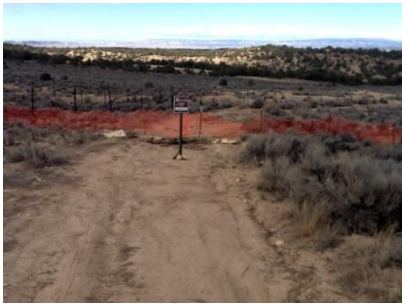
Big Ridge (37) - W

Big Ridge (38) - ENE

Big Ridge (39) - NE

Big Ridge (40) - N

Big Ridge (41) - E



Big Ridge (42) - N

Big Ridge (43) -

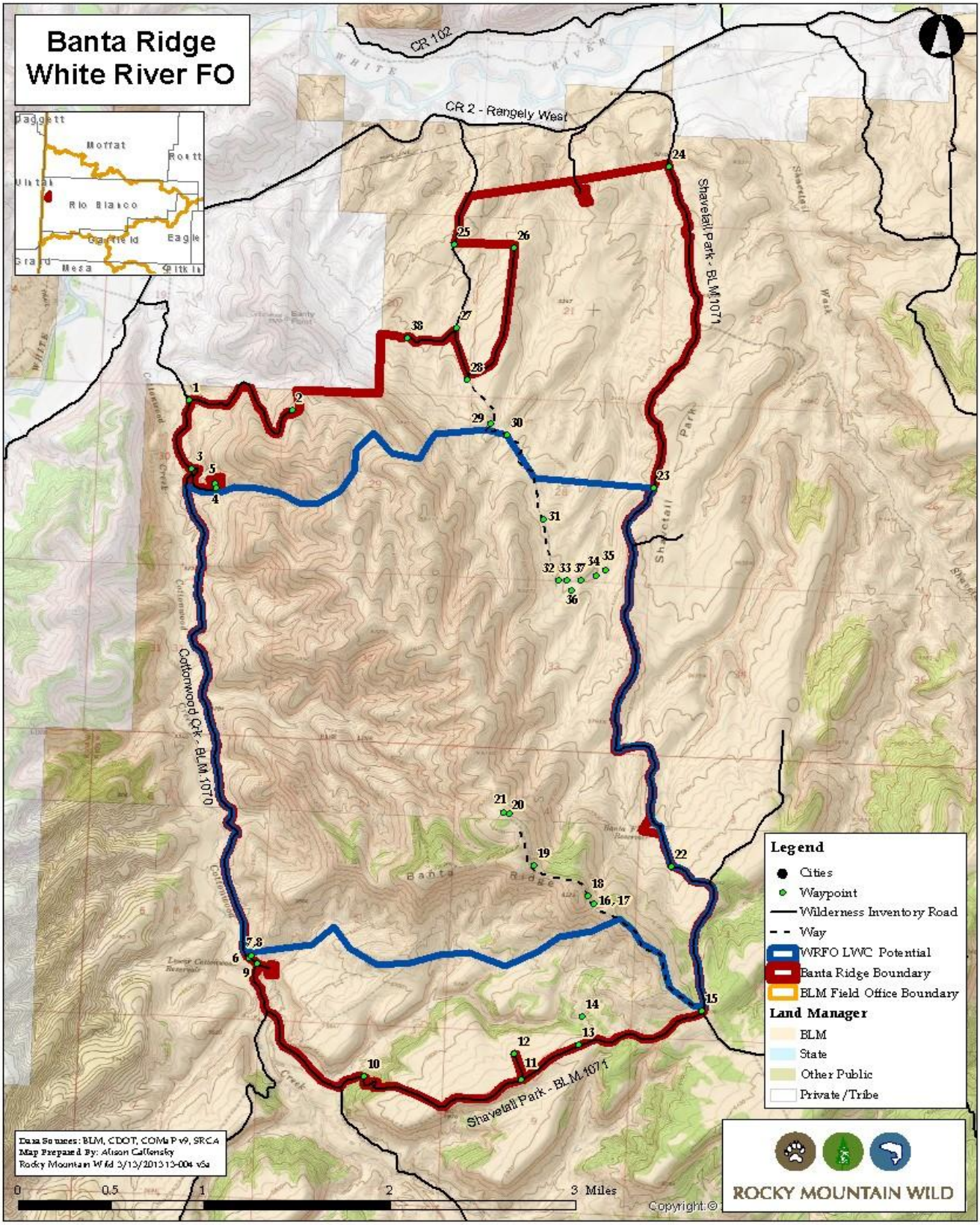
Big Ridge (44) -

Big Ridge (45) -

Lands with Wilderness Characteristics Recommendations: Banta Ridge

Banta Ridge. *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Banta Ridge
White River FO
CR 2 - Rangely West
CR 102
Shavetail Park - BLM 1071
Cottonwood Crk - BLM 1070
Banta Ridge
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Banta Ridge 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 5/13/2013 13-004 v5a
0 0.5 1 2 3 Miles
ROCKY MOUNTAIN WILD

Overview and Boundary Delineation:

The Banta Ridge proposed Lands with Wilderness Characteristics (LWC) unit is situated around nine miles west of Rangely, Colorado and just south of the White River in Rio Blanco County. The unit is bounded on the west by the Cottonwood Creek Road (BLM 1070), on the south and east by Shavetail Park Road (BLM 1071) and on the north by private lands, several oil and gas facilities, and a large interstate powerline. Just to the east, and separated only by BLM 1071, is the 15,200-acre Shavetail Wash proposed LWC unit. The bulk of the 6,600-acre Banta Ridge unit is made up a single long north to south trending ridge that rises to more than 6,500 feet in elevation. On the upper slopes of this ridge, pinyon-juniper woodlands can be found, while the lower washes and drainages below the ridge are dominated by sage shrublands. The area provides important mule deer, greater sage-grouse, and white-tailed prairie dog habitat, and is home to several rare plant species.

Banta Ridge was identified by BLM's White River Field Office as a potential LWC unit in its *Non-WSA Lands with Wilderness Characteristics Inventory Update* from August 2012. In the report, the BLM identified an area of 4,100 acres around Banta Ridge (delineated by the blue line on the attached map) that had the potential to qualify as a LWC unit. However, the BLM's boundary was not defined by an in-depth and on-the-ground inventory of these lands, and instead relied upon aerial imagery and GIS data which included, among other layers, an out-of-date road layer. Therefore, the boundaries proposed by the BLM in the LWC inventory report contain several inaccuracies that do not meet BLM's own policies for identifying and delineating Lands with Wilderness Characteristics.

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 objective and thorough assessment of that unit's wilderness characteristics be made.

During May and October of 2012, The Wilderness Society visited the Banta Ridge area to conduct an in-depth, on-the-ground field inventory of the Banta Ridge LWC unit. Our goal was to assess whether the BLM's desktop inventory boundaries needed to be adjusted in any way to better meet the criteria for an LWC boundary as laid out in Manual 6310. A secondary goal was to gather data on the wilderness characteristics of the unit after the necessary boundary adjustments were made.

In this particular case, TWS identified several adjustments that should be made to the BLM's proposed Banta Ridge LWC boundary in order to bring it in line with the policies laid out in Manual 6310. Once these adjustments are made, a more complete picture of the area's outstanding wilderness character can be assessed. These boundary adjustments are detailed below (and in the attached photo proof sheet), along with narratives describing the wilderness characteristics found within the unit.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Banta Ridge proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Banta Ridge LWC unit comprises a block of 6,600 acres of contiguous roadless acres. 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). All photopoints referred to in the narrative below can be seen in the attached photosheet for Banta Ridge.

Beginning in the northwest corner of the unit, TWS has found several instances where the BLM's desktop inventory boundaries do not match up to realities on the ground and must be altered to comply with Manual 6310. The BLM's northern boundary begins just south of Waypoint 3 and continues east following no existing road or way to its intersection with Shavetail Park Road at Waypoint 23. While the BLM's boundary may have been drawn to cut out the well pad at Waypoint 4, the well pad access road clearly ends at the pad, and this road should be cherrystemmed into the unit rather than act as a boundary. Waypoint 5 is looking east along the BLM's proposed boundary and shows clearly that there is no road or other qualifying boundary feature in this section.

Because the BLM's proposed northern boundary is not based on a WIR or other qualifying boundary feature, this boundary should be moved north. At Waypoint 1, a short dead end road leaves BLM 1070 and heads east to a producing oil and gas well. This road qualifies as a WIR as it is clearly maintained to ensure access to the well pad. At the well pad, the boundary bumps into and follows private land east and north, eventually intersecting with another well pad at Waypoint 38—this is the northwest boundary of the Banta Ridge unit.

BLM's proposed southern boundary for the Banta Ridge unit is similar to the northern boundary in that it does not appear to be based on any on-the-ground features or developments that would qualify it as a boundary for a LWC unit. At Waypoint 8, a boundary was drawn which cuts west across the southern slopes of Banta Ridge terminating at Waypoint 15. Except for a small section at the eastern edge of this boundary, the route does not follow any road, way, or developed right-of-way and does not qualify as a WIR. The southern boundary should be moved south to follow Shavetail Park Road (BLM 1071), which clearly meets the criteria of a WIR.

Following the new boundary south along BLM 1070 and east along BLM 1071, there are several features that should be cut out or cherrystemmed from the LWC unit. At Waypoint 9, a very short WIR accesses the producing well pad just off of BLM 1070. At Waypoint 11, another WIR provides access for a producing well pad at Waypoint 12. Waypoints 13 and 14 show an overgrown and out-of-use road that may have once provided access for a plugged and abandoned well to the north; no sign of this well exists and the road is not maintained, does not receive regular or continuous use, and has been reclaimed to the point of invisibility in several sections.

At Waypoint 15, the signed and numbered BLM 1109 departs Shavetail Park Road and heads northwest into the LWC unit. While this road is signed as open (Waypoint 15) and was obviously constructed using mechanical means, it quickly deteriorates in condition to the point where it is impassable to all vehicles but OHVs. Waypoints 16 and 17 show the current, non-maintained condition of BLM 1109 less than one mile from its beginning at the Shavetail Park Rd. The route here is overgrown, eroded, and showing no signs of maintenance using mechanical means to ensure regular or continuous use. Further along at Waypoint 21, the route reaches a flat bench where conditions seem to be reclaiming the road to a natural state and where no maintenance has occurred for a significant period of time. BLM 1109 does not qualify as a WIR and as such was not cherrystemmed into the unit.

The BLM correctly identified Shavetail Park Road (BLM 1071) as the eastern boundary for the Banta Ridge LWC. However, at a seemingly random point marked by Waypoint 23, the BLM boundary departs this WIR to head west. As mentioned earlier, this northern boundary follows no visible qualifying boundary feature and should be moved to the north.

Waypoint 24 marks the northern boundary of the Banta Ridge unit as this is where a large transmission line travels in an east/west direction. The transmission line itself is substantially noticeable and, because it is a developed right-of-way, it should constitute the boundary of the unit. The line between Waypoints 25, 26, and 28 is where the boundary must jog temporarily eastward to avoid some substantially noticeable impacts from oil and gas development. At Waypoint 28 there is a faint way that travels south into the unit. Immediately after the intersection with the well pad access road at Waypoint 28, this route is unmaintained and sees no regular or continuous use. Waypoints 29 through 35 show the condition of this way, including revegetated segments, severe erosion and wash outs, and faint to invisible tracks. Waypoints 34 and 35 show the eastern terminus where the route approaches Shavetail Park Road. At this point, the way is convex and impassable to vehicles, and the only sign of use is as a path for cattle. The purpose of this route may at one time have been to access the grazing improvement at Waypoint 36; however, this pond appeared to be out of use in 2012 and the access road leading up to it (Waypoint 37) was almost impossible to discern.

II. Banta Ridge LWC is primarily affected by the forces of nature.

While Banta Ridge lies very near the intensive oil and gas development in and around the Rangely Field, the unit itself is primarily absent of the sights and sounds of energy development and offers an unusual respite in the area from such activities. Six or seven active well pads are scattered evenly around the periphery of the unit, with several more dry and abandoned or plugged and abandoned wells with largely reclaimed or unnoticeable well pads interspersed throughout. All attempts were made to cut out or eliminate developed pipeline rights-of-way within the unit. While there are a few instances of visible grazing improvements such as fencing (Waypoint 18), corrals (Waypoint 7) and small water impoundments (Waypoint 36), these are not substantially noticeable as they are in unmaintained or degraded state, or are screened or overgrown in such a way that their presence is only noticeable in the immediate presence of the development. Because these human impacts are either substantially unnoticeable or have been cut out or removed from the boundaries of the unit, the cumulative effect of the aforementioned minor human impacts do not detract from the wilderness character of the unit itself. The Banta Ridge LWC is primarily affected by the forces of nature and thus meets the criteria for naturalness.

III. Banta Ridge LWC provides outstanding opportunities for solitude and primitive recreation.

The Banta Ridge unit is comprised of a long ridge dissected by several small drainages. These drainages, and the ridge tops themselves, provide opportunities for solitude that are outstanding on their own, and particularly in the context of the surrounding levels of existing and proposed oil and gas development. As seen in photos associated with Waypoints 5 and 10, the deep drainages that cut into Banta Ridge provide a sheltered and closed-in topography that increases the feeling of solitude. Up on the ridge tops, the wide open terrain and big views (Waypoints 19 and 20) provide outstanding hiking, hunting, and camping opportunities, and provide the user with a profound sense of solitude and isolation. Taken as a whole, this unit provides a surprising variety of terrain types and visual experiences.

VIII. Banta Ridge LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found Banta Ridge proposed LWC to contain numerous supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. More than one-third of the unit (primarily the lower elevations on the east and north sides) were identified by Colorado Parks and Wildlife as preliminary general habitat for the greater sage-grouse—a bird recently determined by the US Fish and Wildlife Service to be a candidate for listing on the Endangered Species Act. Much of the Banta Ridge unit also provides important winter habitat for mule deer. In addition to the important wildlife in this area, the Banta Ridge unit is home to several rare plant species, including a good occurrence of ephedra buckwheat (*Eriogonum ephedroides*), which is a BLM sensitive species that is very rare in Colorado. The Banta Ridge unit also lies within both the Dinosaur Lowlands and Eastern Book Cliffs Master Leasing Plans (MLPs), which were accepted by the BLM in 2011. Protecting the wilderness characteristics and roadless nature of this unit will help preserve these significant wildlife values, and these values also contribute to the outstanding recreational opportunities of these lands.

Summary Conclusion

Our extensive on-the-ground inventory of the Banta Ridge unit shows that the BLM was correct in identifying this area as one that could qualify as Lands with Wilderness Characteristics. However, it was readily apparent that the BLM's desktop inventory of the unit did not adequately define the area of contiguous roadless lands and thus any determination as to the area's wilderness character was not based on the entirety of the qualifying area.

The Banta Ridge unit is a unique area that provides an invaluable refuge from nearby intensive oil and gas development. The area provides outstanding opportunities for solitude in its deep drainages and its isolated ridges provide outstanding recreation opportunities. Our inventory has documented necessary boundary adjustments as well as the wilderness characteristics of the area. It is imperative that the BLM now do the same, before any land management decisions are made that might negatively affect these outstanding characteristics of the area.

This overview provides new information, including maps and photos, documenting that the 6,600-acre Banta Ridge unit meets wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Banta Ridge Photopoints

The following photographs correspond with the numbered icons on the attached Banta Ridge map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Banta (1) - E

Banta (2) - NE

Banta (3) - E

Banta (4) - E

Banta (5) - E

Banta (6) - E

Banta (7) - NE

Banta (8) - E

Banta (9) - SE

Banta (10) - NNE

Banta (11) - N

Banta (12) - N

Banta (13) - N

Banta (14) – N

Banta (15) - W

Banta (16) - NW

Banta (17) – NW

Banta (18) - E

Banta (19) - E

Banta (20) – N

Banta (21) - W

Banta (22) - SW

Banta (24) - W

Banta (25) - W

Banta (27) - S

Banta (28) - S

Banta (29)- SW

Banta (30) - SE

Banta (31) - S

Banta (32) - W

Banta (33) - E

Banta (34) - SW

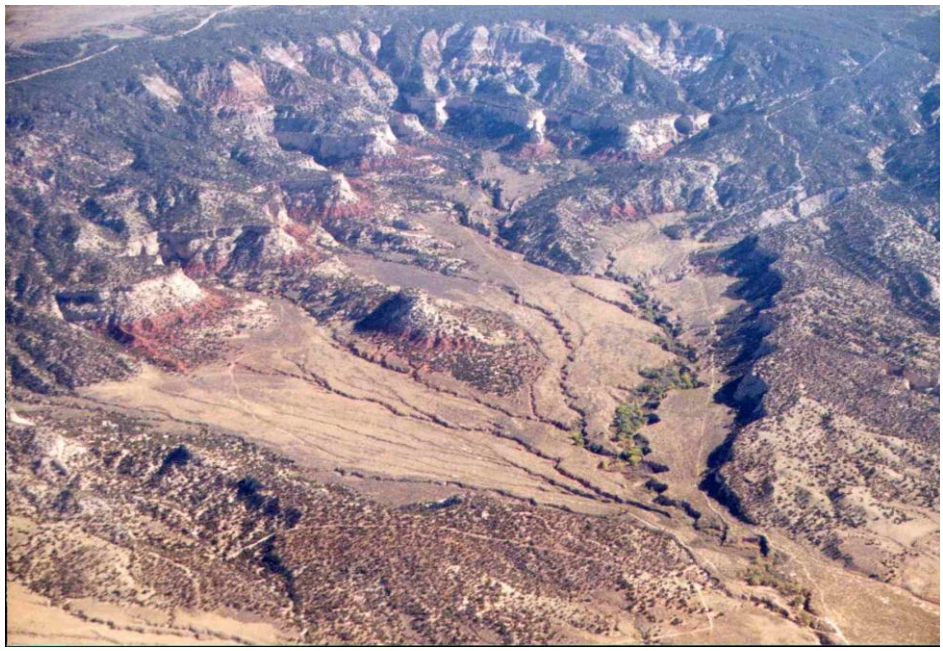
Banta (35) – NE

Banta (36) - SE

Banta (37) - SSW

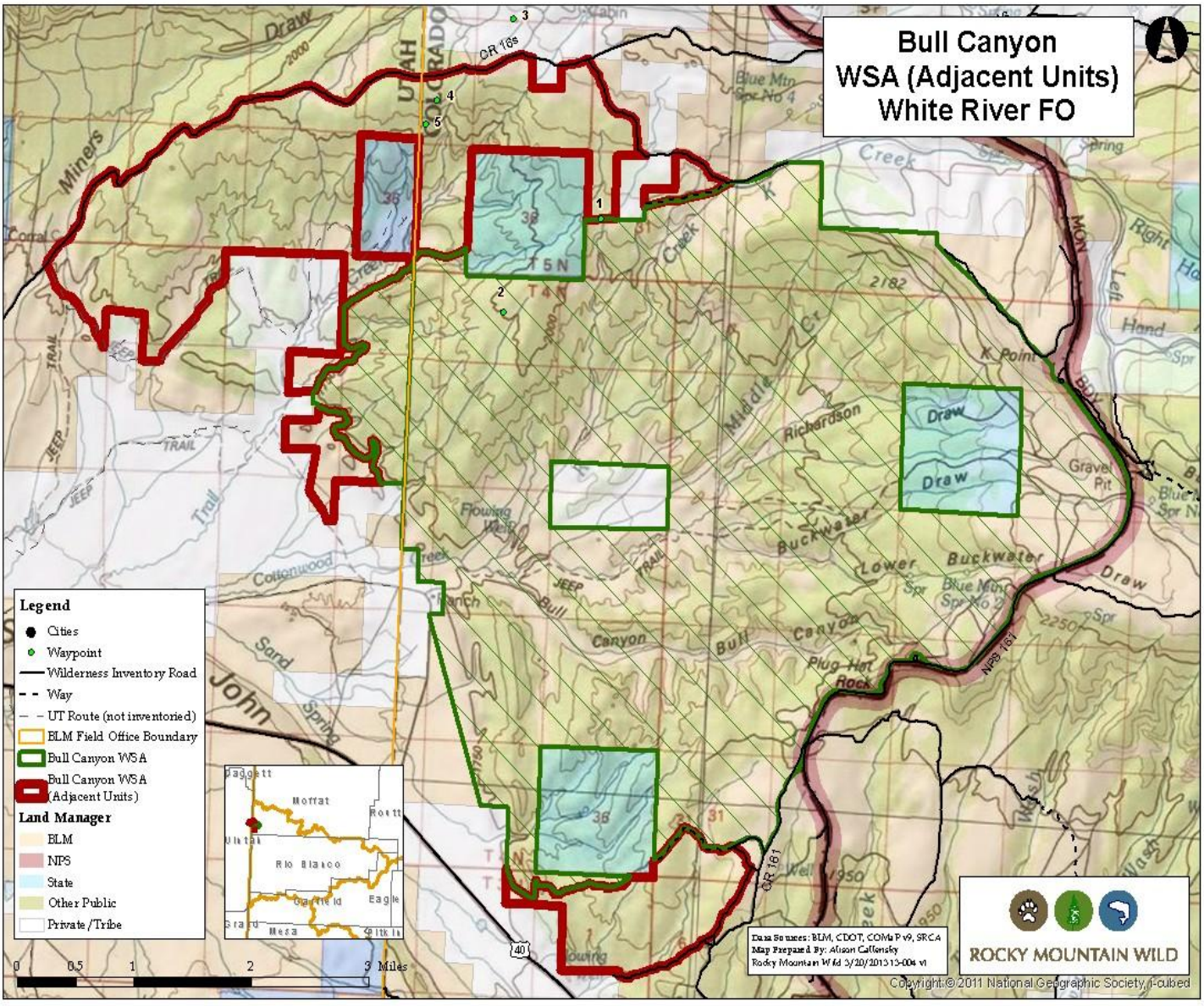
Banta (38) - W

Lands with Wilderness Characteristics Recommendations: Bull Canyon WSA (Adjacent Units)



Bull Canyon WSA (Adjacent Units) *Photo: Kurt Kunkle*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Bull Canyon
WSA (Adjacent Units)
White River FO
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
UT Route (not inventoried)
BLM Field Office Boundary
Bull Canyon WSA
Bull Canyon WSA (Adjacent Units)
Land Manager
BLM
NPS
State
Other Public
Private/Tribe
0 0.5 1 2 3 Miles
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Caffensky
Rocky Mountain Wild 5/20/2013-004 v1
ROCKY MOUNTAIN WILD
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Overview and Boundary Delineation:

The Bull Canyon WSA (Adjacent Units) proposed Lands with Wilderness Characteristics (LWC) unit is located between Dinosaur National Monument and US Highway 40 near the town of Dinosaur in Moffat County, Colorado. These units offer logical additions to the Bull Canyon WSA and enhance the area's wilderness characteristics. There are two adjacent units, one at the northwestern portion of the unit and the other at the southern tip of the WSA.

The Bull Canyon WSA was inventoried by the BLM and finalized in 1980. In the BLM's 1991 *Wilderness Study Report,* the BLM recommended to Congress and the President that Bull Canyon be designated a Wilderness Area. This report does not discuss the wilderness characteristics of the Bull Canyon WSA. We agree fully with the BLM's assessment that Bull Canyon WSA qualifies for, and should be managed for and designated as a wilderness area.

Here we discuss two parcels adjacent to the WSA that should be managed as LWC lands consistent with Manual 6310. 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 objective and thorough assessment of that unit's wilderness characteristics be made.

The expanded area along with Utah's portion and the WSA offers outstanding opportunities for solitude and primitive and unconfined recreation. The upper Tail Creek basin offers wonderful opportunities for peace, quiet and exploring.

These values, along with the wilderness qualities of the lands within the boardering Bull Canyon wilderness proposal—naturalness, opportunities for solitude, and opportunities for primitive and unconfined recreation—were not considered in the White River Field Office's Resource Management Plan.

Together these units comprise 4,400 acres of contiguous roadless lands that lie adjacent to the BLM-recommended wilderness currently being managed by the Bureau of Land Management as the Bull Canyon Wilderness Study Area.

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Bull Canyon WSA (Adjacent Units) proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Wilderness Society proposes the following boundaries for the Bull Canyon WSA (Adjacent Units) LWC unit to better meet the policies noted above. These proposals, and other assessments of boundary features, are detailed below and in the attached photo sheet for Bull Canyon WSA (Adjacent Units).

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).

The northwestern expansion moves the boundary from an unnamed way to County Road 16S. Waypoint 5 shows the route the WSA boundary follows; this route is not maintained or regularly used, so it is considered a way. When the Utah BLM inventoried the part of the unit across the state line, they included it with their boundary.

In 1999, Utah BLM completed a Wilderness Inventory for lands adjacent to Bull Canyon WSA and the northwestern expansion. Utah BLM found wilderness character and drew boundaries representing lands with wilderness character. The expanded area, combined with the Utah inventory area, includes the upper Trail Creek Basin, which is very similar to the Bull Canyon/Buckwater Draw complex. Geographically, Utah's inventoried area and the northwestern expansion are part of the same landscape divided only by the state line. Studying a topographical map of the area clearly shows the landscape connectivity across the state line and to CR 165. In fact, when considering the WSA and Utah's Wilderness Inventory, expanding protection to the wilderness quality lands in the northwest expansion area is a necessary piece of the puzzle.

The WSA adjacent on the southern WSA boundary was identified during a desktop inventory and needs to be field checked. We are confident that this area should be inventoried and likely has wilderness character.

After incorporating the boundary changes listed above to the proposed Bull Canyon WSA (Adjacents Unit) LWC, it totals 19,900 acres—this is a 4,400-acre addition to the WSA. Taken as a whole, this unit meet the size criteria for a Lands with Wilderness Characteristics.

II. Bull Canyon WSA (Adjacent Units) LWC is primarily affected by the forces of nature.

As mentioned above, the BLM found the WSA to be natural and recommended the area be designated as wilderness.

Waypoints 2 and 3 show aerial views of the northern adjacent unit from the north and south; the photos show a coehisive unit and a natural landscape. Waypoints 4 and 5 were taken within the adjacent unit and also show a natural landscape.

The adjacent area on the northern portion of the unit meets the naturalness requirement. Human impacts include the vehicle way mentioned above, a fence line and a short spur to a campsite. These impacts do not impair the area's naturalness and are considered substantially unnoticeable.

The Utah BLM 1999 Wilderness Inventory report states:

> *About 2,770 acres of the three Bull Canyon inventory units have wilderness characteristics. The three units, together with the contiguous Bull Canyon Wilderness Study Area (WSA), are large enough to manage as wilderness. Outstanding opportunities for solitude and recreation found within the Bull Canyon WSA extend into the inventory units. There are also scenic, archaeological, and wildlife values. About 30 acres in Unit 1, however, lack wilderness characteristics. p. 135*

The southern expansion shows no human impacts other than a few presumed vehicle ways. We assume that the southern expansion meets the naturalness criteria, pending field work

III. Bull Canyon WSA (Adjacent Units) LWC provides outstanding opportunities for solitude and primitive recreation.

The BLM White River Field Office found the WSA to have outstanding opportunities for primitive and unconfined recreation. The adjacent lands are natural extensions of the WSA, and offer outstanding solitude and recreation.

The Bull Canyon WSA (Adjacent Units) proposed LWC inherits these characteristics while also providing other outstanding opportunities for solitude. The inclusion of the northwestern adjacent unit allows for the entire Trail Creek Basin to be included in one cohesive wilderness unit, thereby enhancing and continuing the outstanding opportunities found in the WSA.

The southern adjacent unit will likely be a natural extension of the outstanding opportunities found in the WSA. There are two smaller drainages within the adjacent acreage that have a very high chance of containing outstanding opportunities on their own. On-the-ground field work should be completed to verify this finding.

Opportunities for primitive recreation in the Bull Canyon WSA (Adjacent Units) proposed LWC include hunting, hiking, backpacking, horseback riding, rock climbing, geology, star-gazing, and bird-watching.

Bull Canyon WSA (Adjacent Units) LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

The area has historical significance as the Dominguez/Escalante expedition camped near the present K Ranch in the 1700s. The BLM's 1991 *Wilderness Study Report* states:

> *The Dominguez/Escalante Expedition of 1776 reportedly camped within the west central portion of the WSA. The history of the encampment is well documented and recounts that the expedition drew water from a flowing well and hunted buffalo there. (p. 8)*

The expedition is named after Father Silvestre Velez de Escalante, a Spanish Franciscan missionary-explorer, who in 1776-77, along with his superior Francisco Dominguez, set out on an expedition seeking a northern route to Monterey in California from Santa Fe (now in New Mexico). Father Escalante chronicled this first European exploration across the Great Basin desert. (Source: http://www.desertusa.com/mag99/sep/papr/escalante.html).

While Dominguez and Escalante did not reach Monterey, their documented journey had a great impact on the interior west. The route of Dominguez and Escalante is being considered for inclusion in the National Trail System.

The area contains ancient pinyon pine forests that have been studied by the University of Arizona in relation to climatic variability. The BLM's 1991 Wilderness Study Report states:

> *The University of Arizona has studied relic pinyon pine in the area to establish dendrochronological data on climate extending more than 600 years into the past. Although none is currently proposed, continued research in the Bull Canyon area is anticipated. This would not affect wilderness characteristics. (p. 9)*

Two overlooks along the Dinosaur National Monument road provide views and educational opportunities of the Bull Canyon proposed Wilderness area. The Plug Hat Butte overlook and nature trail provides views of Bull Canyon proper as well as views farther afield of Stuntz Ridge and Cliff Ridge. The Escalante overlook provides views of the northern part of the proposed Wilderness area.

Summary Conclusion

Our on-the-ground inventory of the Bull Canyon WSA (Adjacent Units) proposed LWC shows that the BLM missed an opportunity to identify the full acreage of wilderness-quality lands surrounding and abutting the Bull Canyon Wilderness Study Area, which is currently being managed for the protection of its wilderness characteristics by the BLM. The WSA has also been recommended by the BLM for full wilderness designation. Both adjacent acreage on the north and south are significant continuations of the characteristics found in the WSA. Splitting Trail Creek Basin in half, which is what the WSA boundary does, makes little sense.

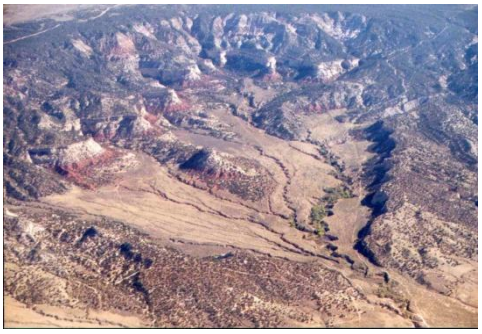
Our inventory has documented the suggested boundaries as well as the wilderness characteristics located in the Bull Canyon WSA (Adjacent Units) proposed LWC. It is imperative that the BLM give this unit a full inventory to document these and any additional outstanding wilderness characteristics before any land management decisions are made that might negatively affect these resources.

This overview provides new information, including maps and photos, documenting that the 4,400-acre Bull Canyon WSA (Adjacent Units) meets all wilderness criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Bull Canyon Photo Points

The following photographs correspond with the numbered icons on the attached Template unit map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Bull Canyon (1) - w



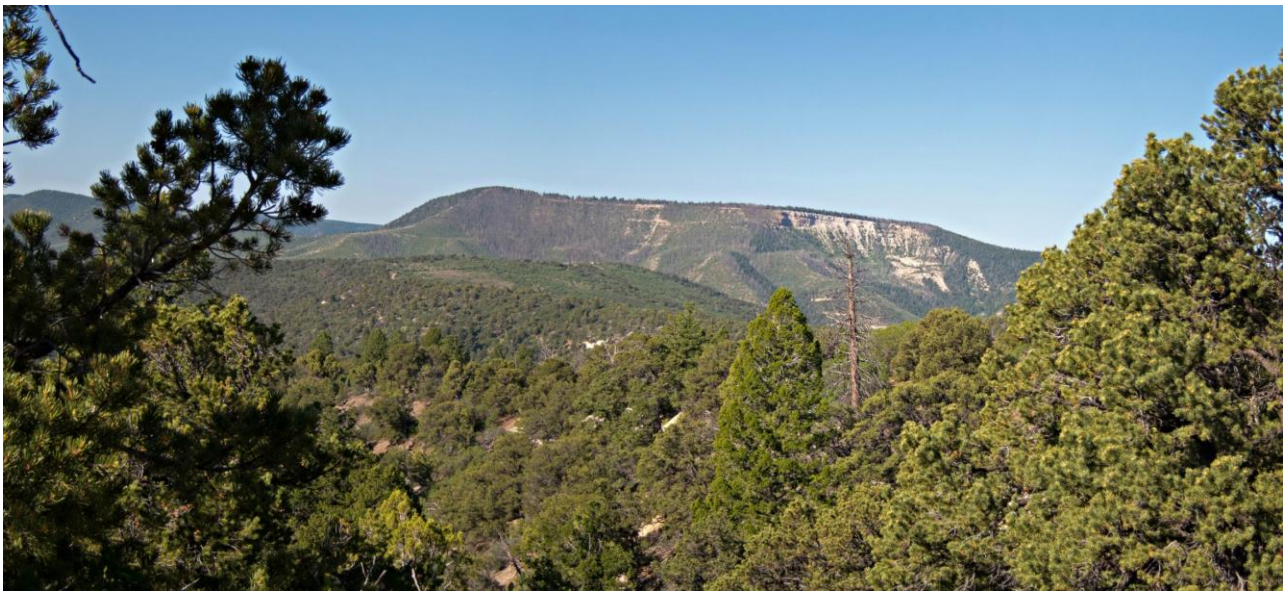
Bull Canyon (2) - s

Bull Canyon (3) - n

Bull Canyon (4) - w

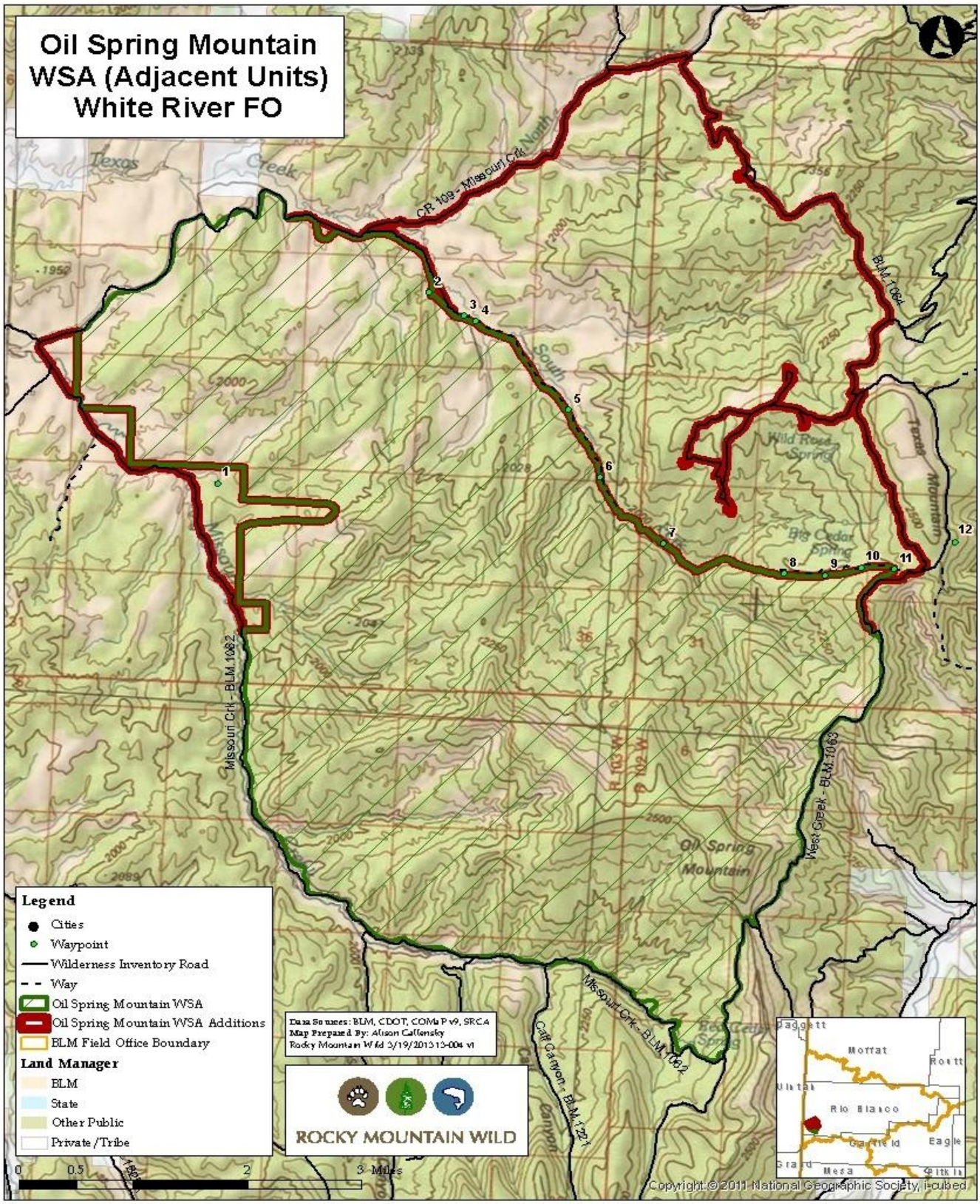
Bull Canyon (5) - e

Lands with Wilderness Characteristics Recommendations: Oil Spring Mountain WSA (Adjacent Units)



Oil Spring Mountain, White River Field Office *Photo: Soren Jespersen*

The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manuals 6310 and 6320 as Lands with Wilderness Characteristics (LWC). This information should be considered new information, as the BLM has yet to conduct and/or publish a full field inventory of this unit to document the wilderness characteristics of the unit and assess whether the boundaries comply with BLM's Lands with Wilderness Characteristics policies.


Oil Spring Mountain
WSA (Adjacent Units)
White River FO
Texas Creek
CR 109 - Missouri Crk North
BLM 1064
South
Wild Rose Spring
Texas Mountain
Big Cedar Spring
Missouri Crk - BLM 1062
West Creek - BLM 1063
Oil Spring Mountain
Missouri Crk - BLM 1062
Cliff Canyon - BLM 7221
Cliff Canyon
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
Oil Spring Mountain WSA
Oil Spring Mountain WSA Additions
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
Data Sources: BLM, CDOT, COMaP v9, SRC4
Map Prepared By: Alison Caffensky
Rocky Mountain Wfd 3/19/2013 13-004 v1
ROCKY MOUNTAIN WILD
0 0.5 2 3 Miles
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
Copyright © 2011 National Geographic Society, i-cubed

Overview:

Oil Spring Mountain is a centerpiece of the remote wildlands of northwestern Colorado. Rising above the deep forested canyons and vertical rock faces of the Texas, Missouri Creek, and West Douglas Creek drainages, Oil Spring Mountain hosts a variety of habitat types, making it a unique wildlife resource in the region. Wild horses roam these canyons and high meadows, and black bear, elk, mule deer, and mountain lions are also found in the area. Much of the area overlaps the BLM's Oil Spring Mountain Area of Critical Environmental Concern (ACEC), which was put in place in order to protect spruce fir and other important biologically diverse plant communities. The Texas and Missouri Creek drainages offer up the highest known cultural resource density (one site per 32 acres) in BLM's White River Resource Area; artifacts and rock art from prehistoric sites indicate that the area has been occupied from approximately 7,000 years ago to the late 1870s. There are three known petroglyph panels within Oil Spring Mountain.

17,740 acres of Oil Spring Mountain were designated as a Wilderness Study Area (WSA) as a result of inventories conducted by BLM in the late 1970s. However, thousands of acres to the north of the present WSA were never inventoried. The recently revised BLM Manual 6310 states that an area may qualify for Lands with Wilderness Character (LWC) protections if it is "contiguous with lands which have been formally determined to have wilderness or potential wilderness values, or any Federal lands managed for the protection of wilderness characteristics" - including Wilderness Study Areas. In the summer of 2012, The Wilderness Society visited the Oil Spring Mountain area to assess whether in fact certain lands met the above criteria for consideration as LWCs. In doing so we determined that nearly 8,000 acres of lands—primarily to the northeast of the existing WSA but also including a few hundred acres along Missouri Creek west of the WSA—met the above criteria because of their location adjacent to and contiguous with the existing WSA. A description of these findings is detailed below and in the attached photosheet for Oil Spring Mountain WSA (Adjacent Units).

Discussion of Wilderness Characteristics including Boundary Adjustments:

I. Oil Spring Mountain WSA (Adjacent Units) proposed Lands with Wilderness Characteristics meets the minimum size criteria for roadless lands.

The Oil Spring Mountain WSA (Adjacent Units) is made up of two units comprising approximately 8,000 roadless acres. 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 (Wilderness Inventory Road). 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 separated the Oil Spring Mountain WSA from lands to the west and northeast do not meet the above criteria for boundary roads; thus, these areas are contiguous with the WSA and meet the size criteria for a LWC. We have detailed these areas below and in the attached photosheet.

Waypoint 1 was taken in an area that was left out of the original WSA designation because it was at the time land managed by Colorado Department of Wildlife. These lands are now entirely under BLM jurisdiction. The small ways that enter the area near Waypoint 1 were once used to access two pre-FLPMA oil and gas well pads. These wells have been

abandoned since the early 1980s and their access roads are almost entirely reclaimed (Waypoint 1). These routes do not qualify as WIRs; all excluded lands north and east of BLM 1062 (Missouri Creek Road) are adjacent to the WSA and should be recognized as Lands with Wilderness Character according to BLM policies.

In the northeast, a large section of BLM lands north and east of the South Fork of Texas Creek was not included in the original inventories of the Oil Spring Mountain area. An antiquated and difficult to distinguish route (BLM 1211) follows the South Fork of Texas Creek southeast from its junction with Rio Blanco County Road 109. This route acts as the boundary of the WSA; however, it currently does not meet the criteria for a WIR. Waypoints 2 through 11 show that this route is unmaintained and impassable to vehicles throughout its length. The route is overgrown, eroded, washed out, and sees little use. Large sagebrush grow directly in the roadbed (Waypoint 7, Waypoint 9) and the only sign of traffic is that from wild horses. The lands north and east of this route—as far north as CR 69 and BLM 1064 (see map)—are adjacent to the WSA and as such meet the size criteria for consideration as Lands with Wilderness Character.

II. Oil Spring Mountain WSA (Adjacent Units) proposed LWC is primarily affected by the forces of nature.

The 1980 inventory that resulted in the creation of the Oil Spring Mountain WSA found the area to be primarily affected by the forces of nature and to possess apparent naturalness.

> *The Oil Spring Mountain WSA is predominantly natural in character with negligible human imprints. The flat-topped Oil Spring Mountain dominates the southeastern half of the WSA with associated ridges and numerous drainages radiating out in all directions. The WSA trends to the northwest from Oil Spring Mountain as elevations drop and landforms change from a mountain to arid slickrock type/landscapes with numerous sandstone draws, a cave and natural arch. Natural earth flows have occurred in several locations on the highly erosive soils an Oil Spring Mountain. Elevations range from 6,000 feet in the northwest to 8,550 feet on Oil Spring Mountain.*
>
> *At least 5 separate and diverse botanic communities are found in the WSA. The lower elevations support saltbush/greasewood, sagebrush steppe, and pinyon-juniper woodland plant communities. Dense mountain shrub communities with mountain mahogany, serviceberry, snowberry, oakscrub, pockets of aspen trees, and associated mountain shrub species dominate the mid to upper slopes. A dense stand of Douglas fir, and associated understory, dominates the top of Oil Spring Mountain.*
>
> *Oil Spring Mountain WSA is an undeveloped island surrounded by scattered oil and gas wells, roads, and drill pads. As more development occurs in surrounding lands, the WSA serves as a refuge for native flora and fauna that have been displaced by human activates. The WSA provides valuable and diverse habitat which supports mule deer, elk black bear, raptors and other species of wildlife indigenous to western Colorado. There are no other remaining undeveloped areas of similar landform and ecosystems in the oil and gas development belt in this region of Colorado.*
>
> *Only minor imprints of humans are scattered around the periphery of the WSA. Existing range improvements within the WSA include 5 improved springs and 7 stock ponds which are screened by vegetation and topography. Eleven abandoned or plugged drillholes occur within the WSA and 2 shut-in gas wells are in the western portion of the WSA, all of which are well screened by vegetation or topography and remain substantially unnoticeable with in the area.*

- *Wilderness Study Report Volume One, Craig District Study Areas, October 1991, pp. 67-68.*

BLM's WSA report for Oil Spring Mountain points out that the few human impacts in the unit are related to former oil and gas activities and that these impacts "are returning to a natural state". The report emphasizes that "the bulk of the unit remains in a natural condition". Northeast of South Fork Texas Creek, in the Oil Spring Mountain WSA (Adjacent Units), the primary human impacts are minor stock ponds, fencing, and surrounding oil and gas development. Two producing oil and gas well pads overlook the unit from west flank of Texas Mountain; other wells in the unit or on its periphery are currently non-producing or are plugged and abandoned entirely. The bulk of this infrastructure lies outside and above the unit; from within the unit, these features are not visible as the deep canyon walls impede sightlines from the bottoms, and large forested ridges provide thick screening for access roads or other infrastructure. Like its adjacent acreage described by the BLM above, the Oil Springs Mountain WSA (Adjacent Units) are largely free from significant human impacts and retain their apparent naturalness.

III. Oil Spring Mountain WSA (Adjacent Units) proposed LWC provides outstanding opportunities for solitude and primitive recreation.

The BLM found the Oil Spring Mountain WSA to have outstanding opportunities for solitude.

> *Topographic and vegetative screening within the WSA provides outstanding opportunities for visitors to experience solitude. The large blocked configuration of the WSA provides ample room for visitors to disperse and become isolated or segregated from others using the area. The relatively low use within the WSA also contributes to outstanding opportunities for solitude.*
>
> *The panoramic and expansive views from the top of Oil Spring Mountain gives one the sense of remoteness and vastness which* contributes to the feelings of isolation and solitude. Opportunities for solitude are somewhat lessened by oil and gas activity and traffic at the immediate periphery of the WSA although topographic and vegetative screening diminishes the effect of these outside sights and sounds.
>
> - *Wilderness Study Report Volume One, Craig District Study Areas, October 1991, p. 68.*

The deep and narrow canyon and associated ridges that make up the proposed 8,000 acres Oil Spring Mountain WSA (Adjacent Units) also contain similar outstanding opportunities for solitude. The drainage bottom sees little visitation outside of hunting season, and the thick slopeside timber acts as a sufficient screen to visitors from activity outside the unit to the north and east.

Abundant opportunities for primitive and unconfined recreation exist within the unit. The rugged and wild terrain of the unit enhances typical hiking, backpacking, and hunting opportunities that exist elsewhere in the region. Because of the plethora of cultural resources in the area, and the fact that many of these resources have yet to be documented or developed, short hikes through the area can provide surprising and fulfilling discoveries and give the casual visitor an opportunity to experience these artifacts in a primitive and natural setting.

VIII. Oil Spring Mountain WSA (Adjacent Units) proposed LWC has supplemental values that would enhance the wilderness experience and should be recognized and protected.

Our inventory of the area, along with Rocky Mountain Wild's *Assessment of Biological Impact Screen,* found Oil Spring Mountain WSA (Adjacent Units) proposed LWC to contain numerous supplemental values that contribute to the wildness of the area and provide additional evidence that this area's unique qualities should be recognized and protected. The most outstanding of these is undoubtedly the cultural resources of the area. The existing Resource Management Plan for the White River Field Office lists the Texas-Missouri-Evacuation Creek cultural resource area as having "high potential for cultural resources"; the unit contains petroglyphs, quarries and other unmarked and primitive cultural sites. The location of these sites is currently not popularly known, and thus the area provides a unique opportunity to experience these cultural treasures in an exciting way without signage, maps or other interpretive facilities. In addition to the outstanding cultural resources in the area, the unit also contains important fall habitat for black bears, summer and winter range for elk, and summer range for mule deer. The area also lies within the Eastern Bookcliffs Master Leasing Plan (MLP) area, which was accepted by the BLM as a MLP in 2011.

Summary Conclusion

Approximately 8,000 acres of BLM lands contiguous with the Oil Spring Mountain Wilderness Study Area were not analyzed by the BLM in their 2012 *Non-WSA Lands with Wilderness Characteristics Inventory Update.* However, these lands meet the criteria for inclusion as a potential Lands with Wilderness Character unit based on their size, apparent naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation. The BLM found the Oil Spring Mountain WSA to contain these characteristics, and because this proposed LWC unit is contiguous with this WSA, it is clear that this area shares these features as well. The BLM should recognize these facts and give the Oil Spring Mountain WSA (Adjacent Units) a full field inventory in order to formally document these features to ensure their protection.

This report provides new information, including maps and photos, documenting that the approximately 8,000-acre Oil Spring Mountain WSA (Adjacent Units) meets BLM's LWC criteria. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Oil Spring Mountain WSA (Adjacent Units) Photopoints

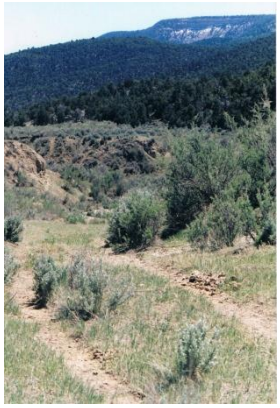
The following photographs correspond with the numbered icons on the attached Oil Spring WSA (Adjacent Units) map and may be referred to in the narrative describing the wilderness characteristics of the area. The direction of view is indicated in the caption.

Oil Spring Adjacents (1) - ESE

Oil Spring Adjacents (2) – SE

Oil Spring Adjacents (3) - SE

Oil Spring Adjacents (4) - ESE

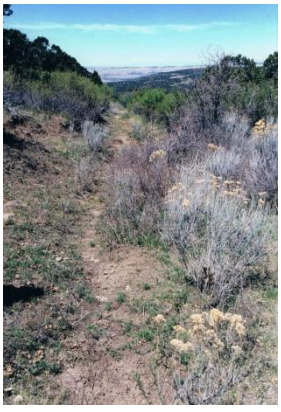


Oil Spring Adjacents (5) - SSE

Oil Spring Adjacents (6) - SSE

Oil Spring Adjacents (7) - SE

Oil Spring Adjacents (8) - W



Oil Spring Adjacents (9) - W

Oil Spring Adjacents (10) - W

Oil Spring Adjacents (11) - W

Oil Spring Adjacents (12) - SW

Other Lands with Wilderness Characteristics

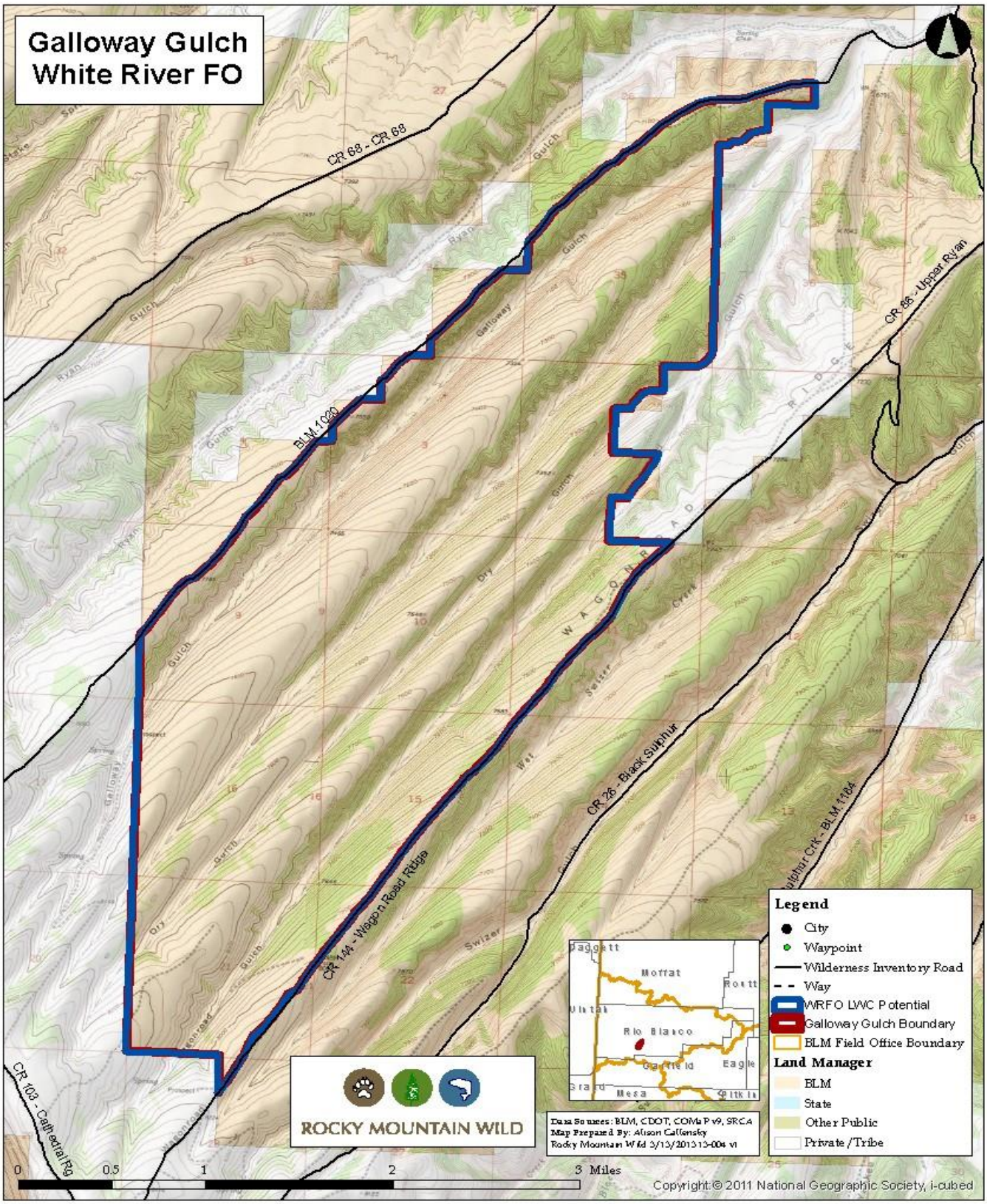
Galloway Gulch

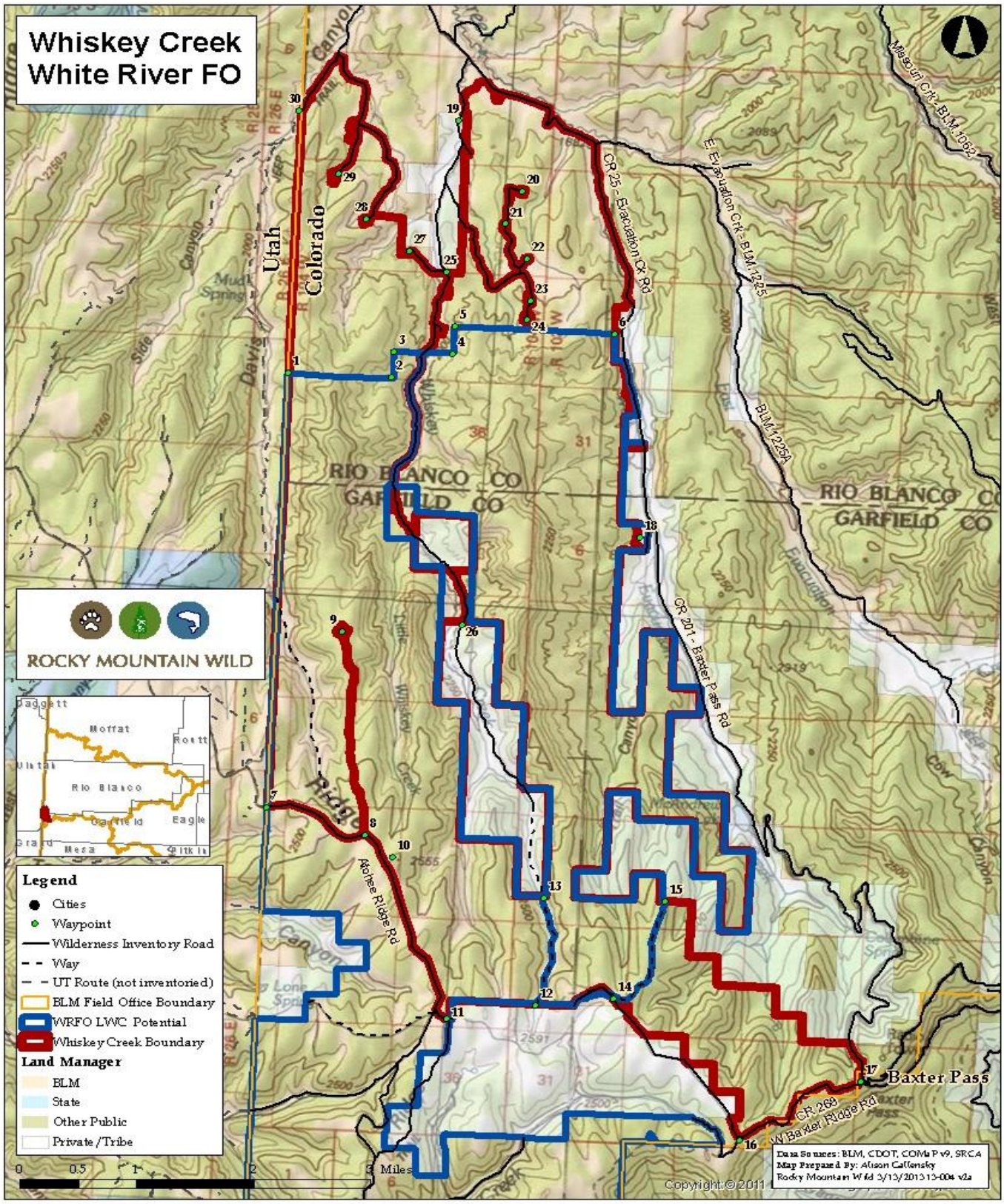
Whiskey Creek

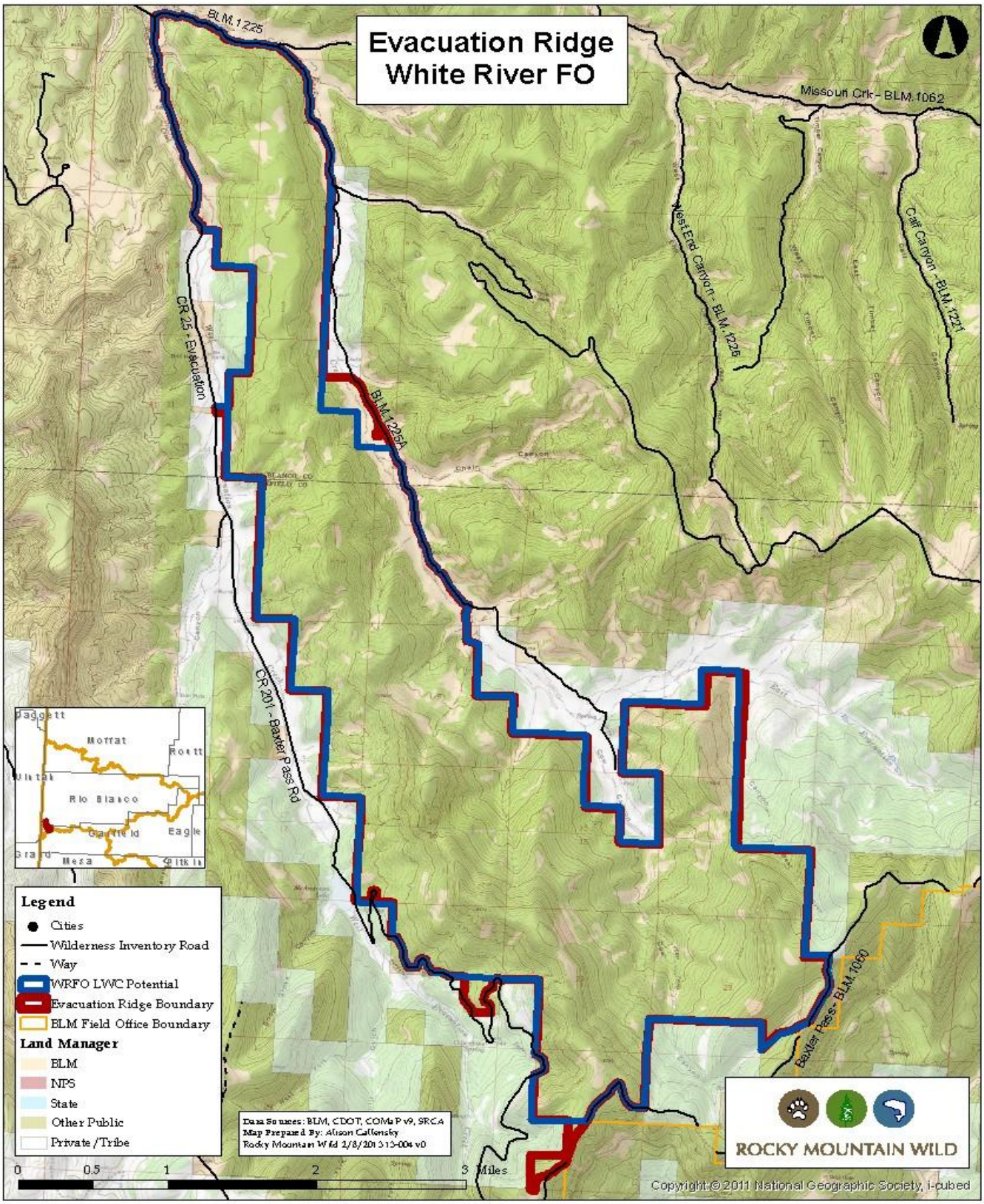
Evacuation Ridge

Gilsonite Hills

These four units are units for which we were not able to conduct full field inventories during the 2012 field season. Three of these units—Galloway Gulch, Whiskey Creek, and Evacuation Ridge—were identified as potential Lands with Wilderness Characteristics through the BLM's desktop inventory of potential LWCs described in the BLM's 2012 *Non-WSA Lands with Wilderness Characteristics Inventory Update.* The BLM has conducted a full field inventory of the Galloway Gulch unit and found it to meet the criteria for Lands with Wilderness Characteristics, pointing out its apparent naturalness and unique opportunities for solitude and primitive recreation. Gilsonite Hills was not identified by the BLM as a potential LWC; however, the area was identified as a block of contiguous BLM lands greater than 5,000 acres through a desktop GIS screen conducted by Rocky Mountain Wild. All of four of these units are included here as placeholders, as they may contain wilderness characteristics and meet the criteria for LWCs laid out in BLM Manual 6310. We intend to conduct full field inventories of these units during the 2013 field season and suggest the BLM do the same. We have included maps of these potential units below.


Galloway Gulch
White River FO
CR 68 - CR 68
CR 86 - Upper Ryan
BLM 1600
CR 26 - Black Sulphur
CR 144 - Wagon Road Ridge
CR 103 - Cathedral Rd
Sulphur Crk - BLM 1104
Legend
City
Waypoint
Wilderness Inventory Road
Way
WRFO LWC Potential
Galloway Gulch 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 3/13/2013 13-004 v1
0 0.5 1 2 3 Miles
Copyright © 2011 National Geographic Society, i-cubed


Whiskey Creek
White River FO
ROCKY MOUNTAIN WILD
Legend
Cities
Waypoint
Wilderness Inventory Road
Way
UT Route (not inventoried)
BLM Field Office Boundary
WRFO LWC Potential
Whiskey Creek Boundary
Land Manager
BLM
State
Other Public
Private/Tribe
Utah
Colorado
RIO BLANCO CO
GARFIELD CO
CR 25 - Evacuation Cr Rd
CR 201 - Baxter Pass Rd
Baxter Pass
CR 26B
W Baxter Ridge Rd
Atchee Ridge Rd
Whiskey Creek
Miles
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Callensky
Rocky Mountain Wild 3/15/2013 13-004 v2a
Copyright © 2011


Evacuation Ridge
White River FO
BLM 1225
Missouri Crk - BLM 1062
West End Canyon - BLM 1225
Calf Canyon - BLM 1221
CR 25 - Evacuation
BLM 1225A
CR 201 - Baxter Pass Rd
Baxter Pass - BLM 1060
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
Legend
Cities
Wilderness Inventory Road
Way
WRFO LWC Potential
Evacuation Ridge Boundary
BLM Field Office Boundary
Land Manager
BLM
NPS
State
Other Public
Private / Tribe
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallonsky
Rocky Mountain Wild 2/8/2013-004 v0
0
0.5
1
2
3 Miles
ROCKY MOUNTAIN WILD
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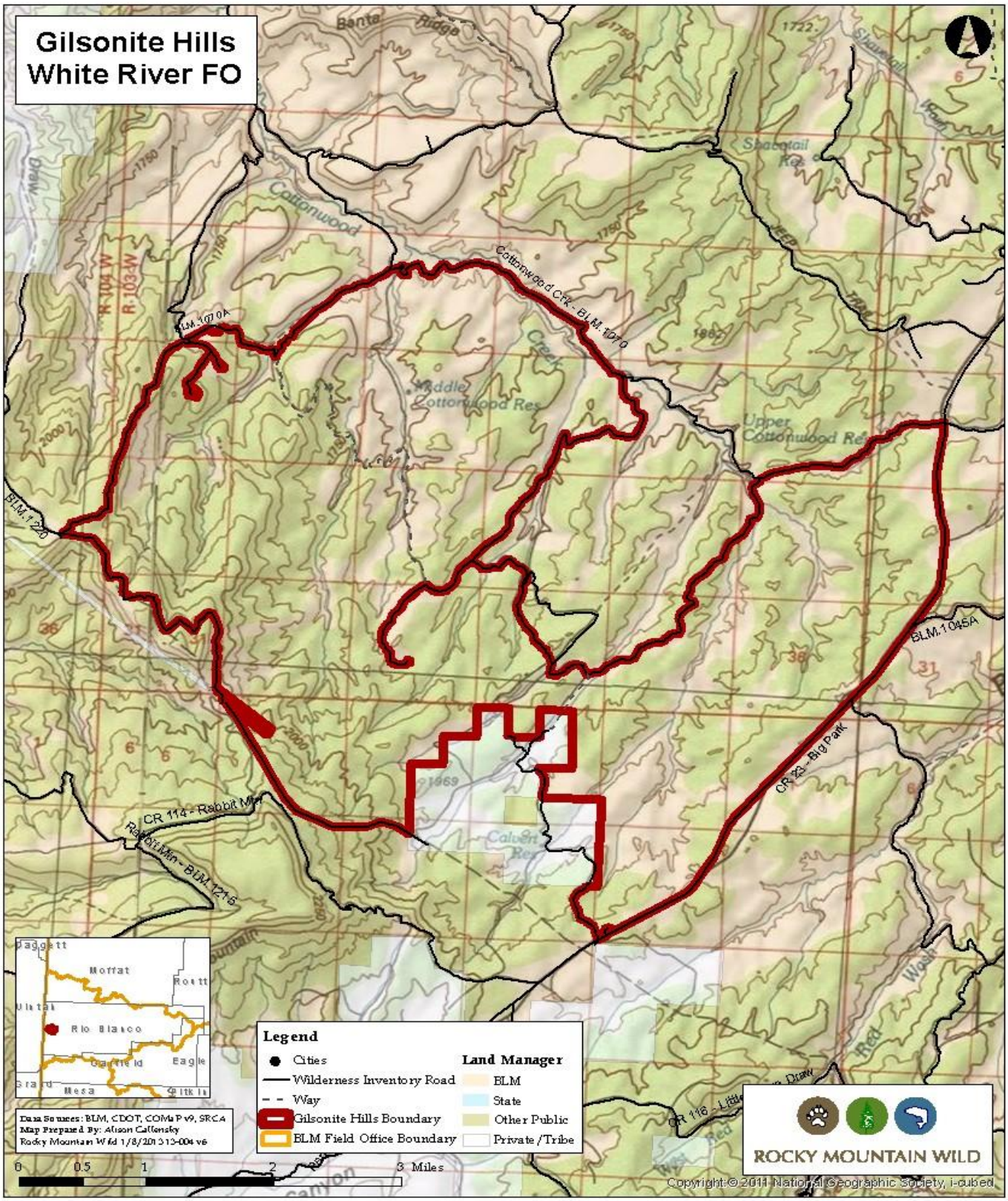
Gilsonite Hills
White River FO
Cottonwood Creek - BLM 1070
BLM 1070A
BLM 1220
BLM 1045A
CR 22 - Big Park
CR 114 - Rabbit Mtn
Rabbit Mtn - BLM 1215
Middle Cottonwood Res
Upper Cottonwood Res
Calvert Res
Shadetail Res
Legend
Cities
Wilderness Inventory Road
Way
Gilsonite Hills Boundary
BLM Field Office Boundary
Land Manager
BLM
State
Other Public
Private / Tribe
Data Sources: BLM, CDOT, COMaP v9, SRCA
Map Prepared By: Alison Gallonsky
Rocky Mountain Wild 1/8/2013-13-004 v6
0 0.5 1 2 3 Miles
Daggett
Moffat
Routt
Uintah
Rio Blanco
Garfield
Eagle
Grand
Mesa
Pitkin
ROCKY MOUNTAIN WILD
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