

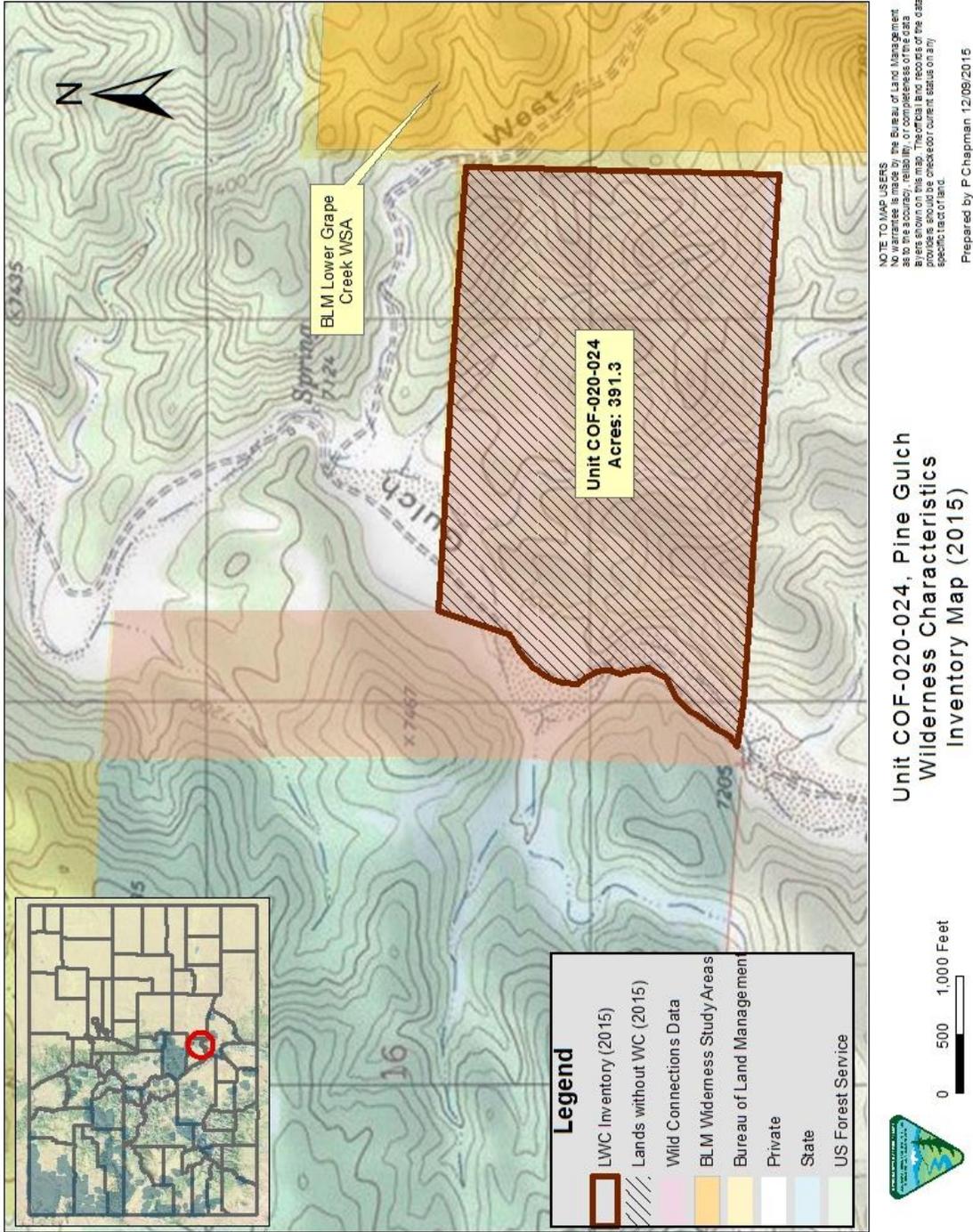
**Lands with Wilderness Characteristics Report:
Pine Gulch
COF-020-024**

Section 201 of FLPMA requires the BLM to maintain on a continuing basis an inventory of all public lands and their resources and other values, which includes wilderness characteristics. It also provides that the preparation and maintenance of the inventory shall not, of itself, change or prevent change of the management or use of public lands. Regardless of past inventory, the BLM must maintain and update as necessary, its inventory of wilderness resources on public lands. In some circumstances, conditions relating to wilderness characteristics may have changed over time, and an area that was once determined to lack wilderness characteristics may now possess them. BLM Manual 6310 'Conducting Wilderness Characteristics Inventory on BLM Lands' is the policy that provides guidance on conducting this inventory process.

Following BLM guidance the Royal Gorge Field Office conducted an inventory in 2013 and found the unit did not meet the criteria for having wilderness characteristics. Per policy, the public has the opportunity to provide new information regarding wilderness characteristics that the BLM must evaluate and consider. New information that meets the minimum standard for further review was submitted by Wild Connections on May 6, 2015 contending that 391.3 acres meet the criteria. This report reflects an updated inventory that combines BLM's 2013 findings and an evaluation of the data submitted by Wild Connections.

Inventory Effort	Acreage Inventoried	Wilderness Characteristics Acreage
BLM 2013 Inventory	391.31	0
Wild Connections Inventory	391.31	391.31
BLM 2015 Evaluation Conclusions	391.31	0

Map 1 Pine Gulch unit analyzed in 2013, new information proposes unit has LWC



**Form 1: Document Wilderness Characteristics Inventory Findings on Record
(Refers to Original 1980's Inventory Effort)**

Is there existing BLM wilderness characteristics inventory information on all or part of this area?

NO X (If no, go to Form 2)
 YES If yes, and if the area has subunits within the broader area, list the unique identifiers for each of those subunits:

Inventory Source: _____
 Inventory Area Unique Identifier(s): 310 001
 Map Name(s)/Number(s): _____
 BLM District(s)/Field Office(s): Front Range District/ Royal Gorge Field Office

BLM Inventory findings on record: Document existing inventory information regarding wilderness characteristics (if more than one BLM inventory area is associated with the area, list each area and answer each question individually for each inventory area):

Document BLM Wilderness Characteristics Findings on Record (Historic Findings)					
Inventory Source Document:					
Area Unique Identifier	Sufficient Size? (YES/NO & acres)	Naturalness (YES/NO)	Outstanding Opportunities for Solitude (YES/NO)	Outstanding opportunities for primitive & unconfined recreation (YES/NO)	Supplemental Values? (YES/NO)

(add rows as needed)

Form 2: Current Conditions: Presence or Absence of Wilderness Characteristics

Area Unique Identifier: COF-020-024, Pine Gulch

Acreage: 391.31 acres

1. Is the area of sufficient size? :

Yes No

The land is smaller than 5,000 acres but is contiguous with the BLM Lower Grape Creek Wilderness Study Area (WSA) (managed by the Royal Gorge Field Office BLM) meeting the size exception 2.a.i.

The unit is bounded as follows:

- The east edge is bounded by BLM Lower Grape Creek WSA;
- The north, west, and south edges are bounded by property lines other than BLM management.

2. Does the area appear to be natural?

Yes No NA

The unit is located less than a 1 hour drive southwest from Cañon City, CO. Unit COF-020-024 is located on the western edge of Lower Grape Creek WSA. The unit contains 391.3 acres of public land.

The unit is rugged and rocky, with Pine Gulch located in the center of the unit. A couple unknown drainages are found within the unit as well. The vegetation is mostly piñon–juniper with some ponderosa pines in the drainages and north facing slopes.

Within the unit, multiple routes were found. Route, CO-020-024-A was found along Pine Gulch. The route was identified to have BLM administrative use as decided by the Royal Gorge Field Office Arkansas River Travel Management Plan (2006). The way is heavily traveled, by local private land owners. The route did not meet the definition to be a wilderness inventory road, but the amount of motorized use on the route is a significant disturbance to the naturalness of the unit. Another way was found, CO-020-024-B. It is assumed the route, B, was built for range use. The way is a user created route that joins with the BLM administrative route that is in the WSA. The route is also used for recreational access to the lands, evidence of fire rings and primitive camping exist along the route. Multiple spurs were found off route CO-020-024-B. The spurs are user created and are a significant impact to the natural landscape. The accumulative impacts of imprints of man found within the unit impact the naturalness of the unit. The unit does not possess wilderness characteristics.

Wild Connections contends that since the BLM did not provide photographic evidence of the significant imprints of man described in BLM's report and they do not have access to the unit it should be considered for having wilderness characteristics. Since the unit is surrounded by private land the BLM also has issues with access to the site. Due to access constraints BLM's original report relied on past planning efforts, staff experience and aerial imagery. Staff reported that the multiple routes within the unit received heavy use based on past observations and experience. The Arkansas River TMP designated an administrative route within the unit. While this road was likely not constructed since it travels down a large wash it does affect the overall naturalness. Since it is within a large wash this route is likely visible from long distances. Viewing aerial imagery there is evidence of other routes within the unit as well (see map 2). Although staff was not able to obtain photos of these routes for the purposes of this specific inventory, staff has observed heavy use on these routes in the past. The routes originate on private land which is on three sides of the parcel. In most instances this usually results in regular use by the adjacent land owners and possibly their neighbors. One of these routes travels within what appears to be an open meadow making it more readily visible.

Per BLM's policy the BLM retains that the human impacts are substantially noticeable within the unit when viewed cumulatively (Manual 6310, page 9). Multiple routes that receive regular use along with an administrative route in a flat open area void of vegetation are all located within a relatively small 391 acre area cumulatively affecting the naturalness of the unit.

3. Does the area (or the remainder of the area if a portion has been excluded due to unnaturalness and the remainder is of sufficient size) have outstanding opportunities for solitude?

Yes ___ No ___ NA X

4. Does the area (or the remainder of the area if a portion has been excluded due to unnaturalness and the remainder is of sufficient size) have outstanding opportunities for primitive and unconfined recreation?

Yes ___ No ___ NA X

5. Does the area have supplemental values?

Yes X No ___ NA ___

Description:

- The unit contains mule deer winter range and elk winter severe range as mapped by Colorado Parks and Wildlife.

Summary of Analysis

Unique Identifier: COF-020-024, Pine Gulch

Acreage: 391.31

Results of Analysis:

Inventory concluded that 391.31 acres consists of significant imprints of man. Multiple routes have evidence of regular motorized use. The accumulative impacts of the motorized use found within the unit affect the naturalness of the unit. The unit does not possess wilderness characteristics.

The unit is bounded as follows:

- The east edge is bounded by BLM Lower Grape Creek WSA;
- The west edge is bounded by wilderness inventory road CO-020-024-A;
- The north and south edges are bounded by property lines other than BLM management.
- The legal description is as follows:
 - o T. 20 S. R. 72 W. Sections 15.
- Does the area meet size requirements or exceptions? Yes No
- Does the area appear natural? Yes No NA
- Does the area offer outstanding opportunities for solitude or a primitive and unconfined type of recreation? Yes No NA
- Does the area have supplemental value? Yes No NA

Check one:

- The area, or a portion of the area, has wilderness characteristics and is identified as land with wilderness characteristics.
- The area does not have wilderness characteristics.

This does not represent a formal land use allocation or a final agency decision, and does not represent a decision in regard to how the area will be managed or address impacts of management decisions.

Prepared by:

Evaluator: Janine Prout/ Recreation Technician

Date: August 13, 2013

Evaluator: Kalem Lenard/ Outdoor Recreation Planner

Date: December 3, 2015

Evaluator: John Lamman/ Rangeland Management Specialist

Date: Sept 10, 2013

Evaluator: Matt Rustand/Wildlife Biologist

Date: Sept 10, 2013

Form 3: Route Analysis:

The Route Analysis includes factors to consider when determining whether a route is a road for wilderness characteristics inventory purposes. For the purposes of this analysis, use the following definition of a “road”. This definition is drawn from and the FLPMA legislative history and historic BLM inventory direction.

Road: An access route which has been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road.

- a. Improved and maintained – Actions taken physically by people to keep the road open to vehicle traffic. “Improved” does not necessarily mean formal construction. “Maintained” does not necessarily mean annual maintenance.
- b. Mechanical means – Use of hand or power machinery or tools.
- c. Relatively regular and continuous use – Vehicular use that has occurred and will continue to occur on a relatively regular basis. Examples are: access roads for equipment to maintain a stock water tank or other established water sources, access roads to maintained recreation sites or facilities, or access roads to mining claims.

If a portion of a route is found to meet the wilderness inventory road criteria (see Part III) and the remainder does not meet these criteria (e.g., a cherrystem road with a primitive route continuing beyond a certain point), identify each segment and explain the rationale for the separate findings.

Wilderness Characteristics Inventory Area Unique Identifier: COF-020-024

Route or Route Segment Name and/or Identifier: CO-020-024-A

I. LOCATION:

Refer to attached map and BLM corporate data (GIS). List photo point references (where applicable) or reference attached photo log:

Map Title: Unit COF-020-024, Pine Gulch, Wilderness Characteristics Map

Map Date: 2013

Describe:

The map shows the parcel inventoried for wilderness characteristics, and routes collected by GPS.

II. ROUTE CONTEXT

The purpose of a route is not a deciding factor in determining whether a route is a road for wilderness characteristics inventory purposes. The purpose of a route does provide context for factors on which such a determination may be based, particularly the question of whether maintenance of the route ensures relatively regular and continuous

use. The purpose also helps to determine whether maintenance that may so far have been unnecessary to ensure such use would be approved by BLM when the need arises.

- A. Current Purpose (if any) of Route: (Examples: rangeland/livestock improvements (stock tank, developed spring, reservoir, fence, corral), inholdings (ranch, farmhouse), mine site, concentrated use site (camp site), recreation, utilities (transmission line, telephone, pipeline), administrative (project maintenance, communication site, vegetation treatment)).

Describe:

The current purpose of route, CO-020-024-A, is a main access road between private properties. It is used and maintained by local residence.

B. Right-of-Way (ROW):

B.1. Is there a ROW associated with this route?

Yes ___ No X Unknown ___

If yes, what is the stated purpose of the ROW?

B.2. Is the ROW still being used for this purpose?

Yes ___ No ___ Unknown or N/A ___

Explain: N/A

III. WILDERNESS INVENTORY ROAD CRITERIA

A. Is there evidence of construction or improvement using mechanical means?

Yes, if either III.A.1 *or* III.A.2 is checked "yes" below ___

No, if both III.A.1 *and* III.A.2 are checked "no" below X

A.1. Construction: Is there evidence that the route or route segment was originally constructed using mechanical means?

Yes X No ___

Examples (partial list):

Paved ___ Bladed X Graveled ___ Roadside Berms ___ Cut/Fill ___ Other ___

Describe: CO-020-024-A has evidence of being constructed by mechanical means.

A.2. Improvements: Is there evidence of improvements using mechanical means to facilitate access?

Yes X If "yes", improvements by? Hand Tools ___ by Machine X

No ___

Examples (partial list):

Culverts ___ Built Stream Crossings ___ Bridges ___ Drainage ___ Barriers ___

Describe:

No recent improvements of the route, CO-020-024-A was observed.

B. Maintenance: Is there evidence of maintenance that would ensure *relatively* regular and continuous use?

Yes, if either III.B.1 *or* III.B.2 is checked "yes" below ___

No, if both III.B.1 *and* III.B.2 are checked "no" below X

B.1. Is there evidence or documentation of maintenance using hand tools or machinery?

Yes ___ If "yes", maintenance by? Hand Tools ___ by Machine ___

No X

Explain:

Route, CO-020-024-A has no evidence of recent maintenance on the route.

B.2. If the route or route segment is in good condition, but there is no evidence of maintenance, would mechanical maintenance with hand tools or machines be approved by BLM to meet the purpose(s) of the route in the event this route became impassable? "Good condition" would be a condition that ensures regular and continuous use relative to the purposes of the route. Consider whether the route can be clearly followed in the field over its entire course and whether all or any portion of the route contains any impediments to travel.

Yes X No ___

Explain:

The BLM Royal Gorge Field Office has identified this route to be an administrative access route through the Arkansas River Travel Management Plan (2006). This route would be maintained if ever became impassable.

C. Relatively regular and continuous use: Does the route or route segment ensure relatively regular and continuous use?

Yes ___ No X

Explain: Describe evidence (e.g., direct: vehicles or vehicle tracks observed; or indirect: evidence of use associated with purpose of the route such as maintenance of facility that route accesses) and other rationale for whether use has occurred and will continue to occur on a *relatively* regular basis (regular and continuous use relative to the purpose(s) of the route). Include estimate of travel rates for the stated purposes (e.g.,

trips per day, week, month, season, year, or even multiple years in some facility maintenance cases).

The route, CO-020-024-A, does not receive regular and continuous use, the route has been decided to only be open for administrative purposes, but no closures have occurred on the route.

IV. CONCLUSION:

Does the route or route segment meet the definition of a wilderness inventory road (i.e., are items III.A and III.B and III.C all checked yes)? If part of the route meets the wilderness inventory road definition and the remainder does not, describe the segment meeting the definition and any remaining portion not meeting the definition and why. Also, describe and explain rationale for any discrepancies with citizen proposals.

Yes = Wilderness Inventory Road
 No = Not a road for wilderness inventory purposes

Explain:

Route, CO-020-024-A does not meet the wilderness inventory road criteria; it is not open for regular and continuous use.

Evaluator: Janine Prout/ Recreation Technician

Date: July 30, 2013

PHOTO LOG

Photographer(s): N/A

Inventory Area Unique Identifier: COF-020-024

Date	Frame #	Camera Direc.	Description	GPS/UTM Location	Township	Range	Sec.	Photo Point #

None Provided

Map 2 Existing routes within the Pine Gulch unit

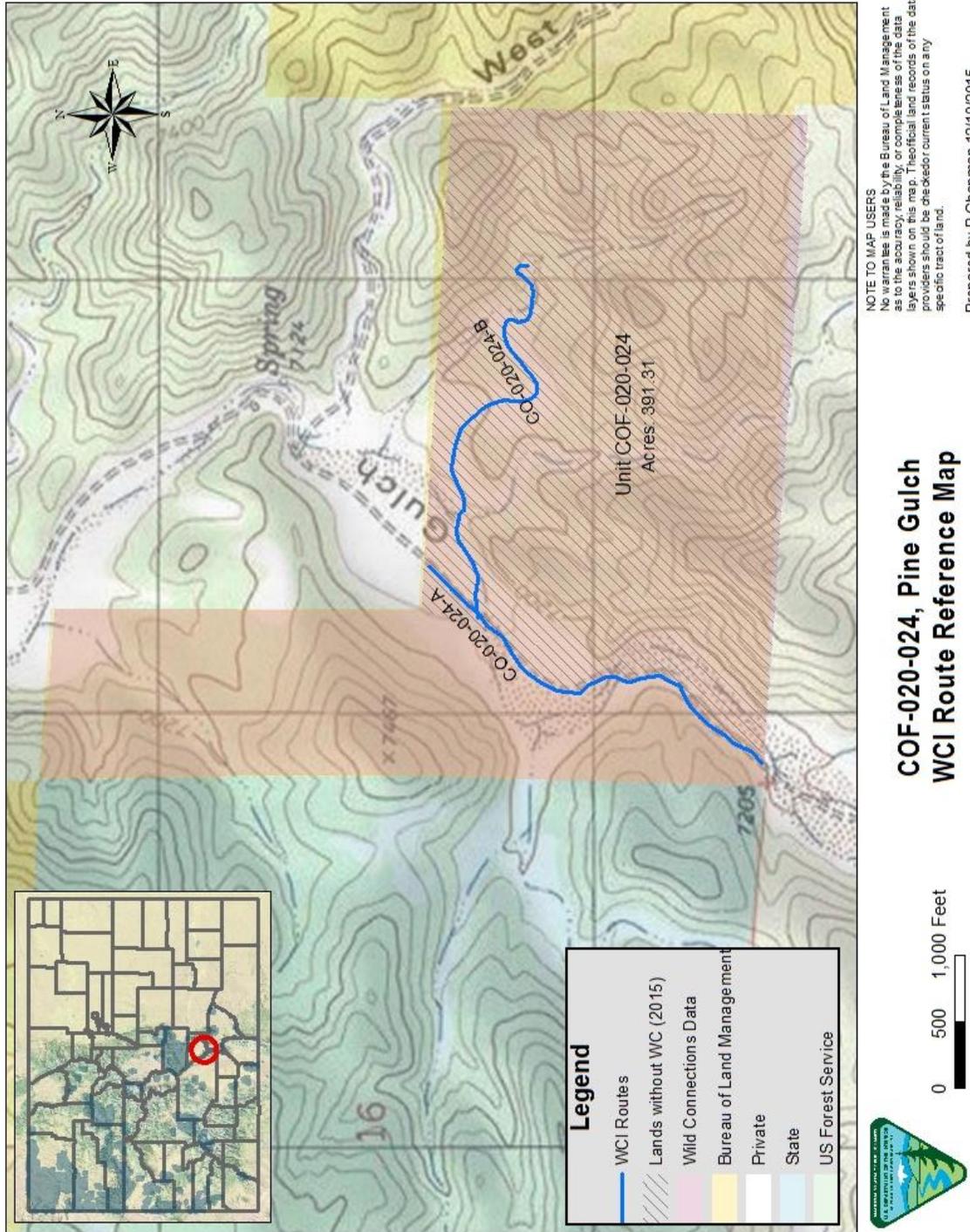


Figure 1 Aerial view of routes within the unit



Royal Gorge Field Office Lands with Wilderness Characteristics Inventory, 2015: Evaluation of new information

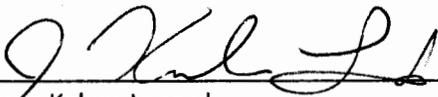
Assessment and Determination

The BLM Royal Gorge Field Office followed manual 6310 in the performance of inventory for lands with wilderness characteristics. In response to new information submitted in May, 2015 by Wild Connections, the 2013 inventory was re-evaluated. A final review was made by comparing existing data and when needed additional field trips were taken to collect data by GPS, inventory forms, and photo points. Resource specialists were also consulted to determine if the conclusion reached in the 2013 inventory remains valid, or whether changes should occur. The above report documents those findings for the following area(s):

Unit ID	Unit Name	Total BLM acreage inventoried	Acreage with Wilderness Characteristics	Acreage without Wilderness Characteristics
COF-020-024	Pine Gulch	391.31	0	391.31

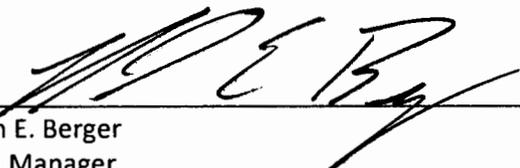
Review:

I have reviewed the inventory results, reports, photos, and maps for the above Lands with Wilderness Characteristics and concur with the findings as submitted.



James Kalem Lenard
Outdoor Recreation Planner, Royal Gorge Field Office

Date: 2/22/16



Keith E. Berger
Field Manager
Royal Gorge Field Office

Date: 2/24/16