

**Lands with Wilderness Characteristics Report:
Poverty Mountain
COF-020-048**

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 3,350 acres met 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	3,350.0	0
Wild Connections Inventory	3,350.0	3,350.0
BLM 2015 Evaluation Conclusions	3,350.0	0

**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): 322-001

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)

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

Area Unique Identifier: CO-020-048, Poverty Mountain

Acreage: 3,350 acres

1. Is the area of sufficient size? :

Yes _____ No X

The unit, CO-020-048, is bounded as follows:

- Bureau of Land Management McIntyre Hills WSA on the northwest edge;
- The southeastern edge is bounded by Bureau of Land Management Lower Grape Creek WSA on southeast edge and wilderness inventory road, Fremont County Road 28, Copper Gulch.
- The northeastern edge and southeast and southwest edges are bounded by property lines other than BLM management.
- The southern corner is defined by wilderness inventory road, Fremont County Road 31.

The BLM's 2013 inventory found the area to have sufficient size to meet the minimal criteria but concluded it did not appear natural due to cumulative impacts of man-made features, most notably a designated road network occupying the center section of the unit. In 2015 the BLM reviewed these findings and policy. The area is smaller than 5,000 acres and is contiguous with the BLM McIntyre Hills Wilderness Study Area (WSA) (managed by the Royal Gorge Field Office BLM). According to the policy in BLM Manual 6310, a size exception 2.a.i. could be used if the area is Roadless. However there are 2.87 miles of wilderness inventoried roads documented within the unit. These roads were designated as routes open to the public, maintained and receive regular and continuous use. The routes are visible throughout the area since they are cut into the sides of the hills, constructed with additional road base and have high use. The report submitted by Wild Connections does not contend that these are wilderness inventory roads. The BLM concludes that this unit does not meet the road-less criteria and the unit was not considered further.

2. Does the area appear to be natural?

Yes _____ No _____ NA X

Description: N/A

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

Description: N/A

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

Description:
N/A

5. Does the area have supplemental values?

Yes X No ___ NA ___

Description:

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

Summary of Analysis:

Unique Identifier: COF-020-048, Poverty Mountain

Acreage: 3,350.0 acres

Results of Analysis:

The BLM's 2013 inventory found the area to have sufficient size to meet the minimal criteria and concluded it did not appear natural due to cumulative impacts of man-made features, most notably a designated road network occupying the center section of the unit. These roads were designated in the Arkansas River Travel Management Plan and meet the criteria for being wilderness inventory roads. Wild Connections submitted information in 2015 contending that the unit did in fact have wilderness characteristics. Their report removed the routes from the defined unit as a cherry stem.

In 2015 the BLM reviewed the information submitted by Wild Connections along with past inventory efforts and policy. BLM Manual 6310 identifies that areas must meet a minimal criteria of being a road-less area over 5,000 acres. The 2.87 miles of designated roads within the central portion of the unit covers a large area in relation to the unit's overall size and routes are in relative close proximity to each other. While Wild Connections report indicates that these cherry stem roads are not visible even from nearby locations given the topographic and vegetative screening. While this is largely true, a consultation with staff that has spent numerous project hours in the area indicated a different viewpoint. Due to past wildfires and fuels projects the area has open views of the cherry stem roads from multiple vantage points. Based on a review of BLM policy, Wild Connections data, and a follow-up consultation with staff, the BLM concludes that the unit does not meet the minimum size criteria based on the fact that the area is not truly Roadless. Therefore the unit does not possess wilderness characteristics.

The unit, CO-020-048, is bounded as follows:

- Bureau of Land Management McIntyre Hills WSA on the northwest edge;
 - The southeastern edge is bounded by wilderness inventory road, Fremont County Road 28, Copper Gulch.
 - The northeastern edge and southeast and southwest edges are bounded by property lines other than BLM management.
 - The southern corner is defined by wilderness inventory road, Fremont County Road 31.
 - The unit is found in parts of the sections listed in the following townships;
 - o T. 19 S. R. 72 W. Sections 4, 5, 7, 8, 9, 16, 17, 18, 19, 20, and 30.
 - o T. 19 S. R. 73 W. Sections: 13, 24, and 25
-
- Does the area meet size requirements or exceptions? Yes _____ No X _____
 - Does the area appear natural? Yes _____ No _____ NA X _____
 - Does the area offer outstanding opportunities for solitude or a primitive and unconfined type of recreation? Yes _____ No _____ NA X _____
 - Does the area have supplemental value? Yes X _____ No _____ NA _____

Check one:

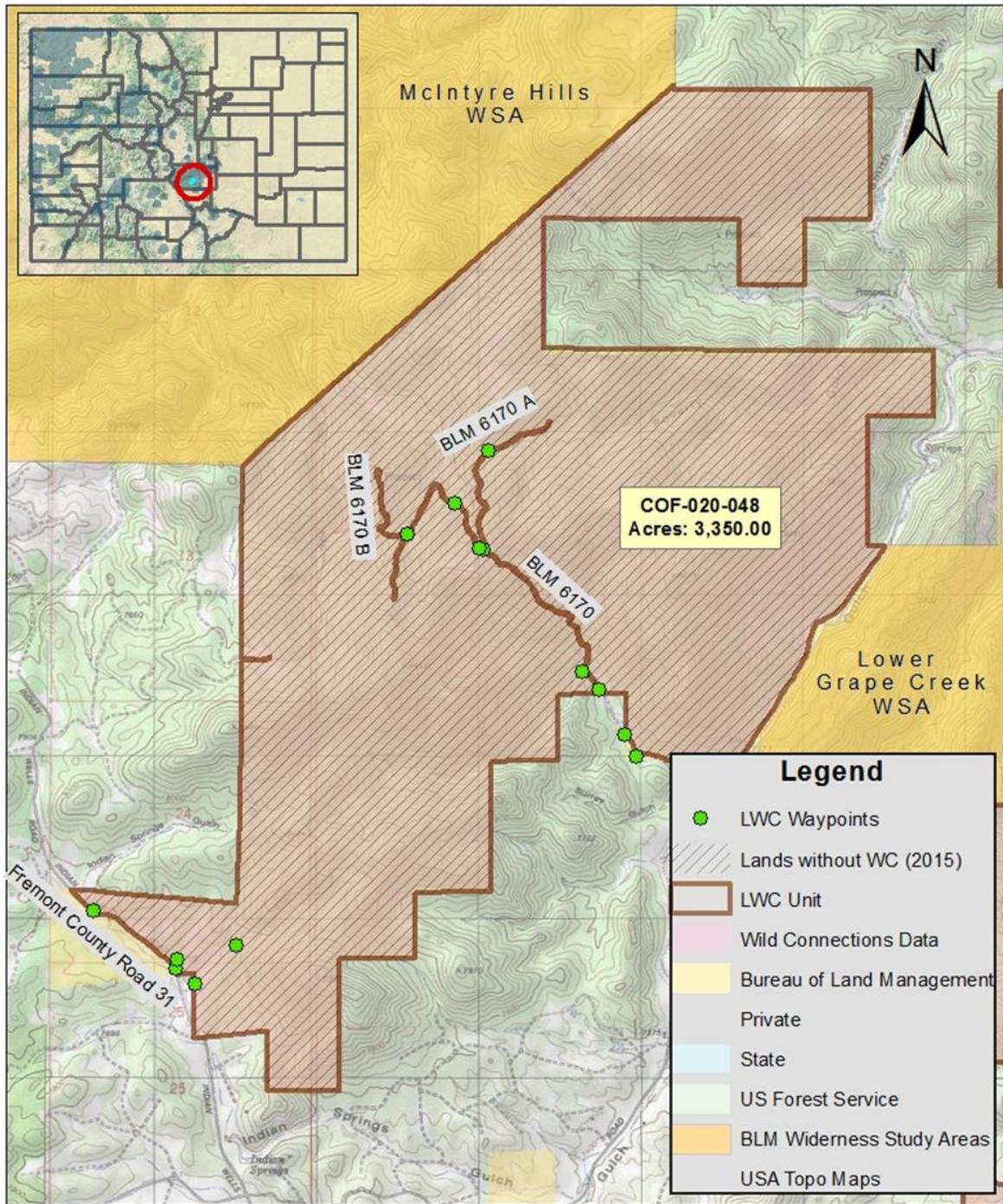
- The area, or a portion of the area, has wilderness characteristics and is identified as land with wilderness characteristics.
- The area does not have wilderness characteristic.

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: May 30, 2013
Evaluator: Kalem Lenard/ Outdoor Recreation Planner	Date: June 28, 2013
Evaluator: Ken Reed/ Forrester	Date: August 4, 2013
Evaluator: Matt Rustand/Wildlife Biologist	Date: Sept 11, 2013
Evaluator: Linda Skinner/ Outdoor Recreation Planner	Date: December 14, 2015
Evaluator: Glenda Torres/ Natural Resource Specialist	Date: December 14, 2015
Evaluator: Monica Mohr/ Rangeland Management Technician	Date: December 14, 2015

Map 1 Poverty Mountain 2015 inventory area with routes and waypoints



0 0.25 0.5
Miles

COF-020-048, Poverty Mountain
Wilderness Characteristics
Inventory Map

NOTE TO MAP USERS
No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of the data layers shown on this map. The official land records of the data providers should be checked for current status on any specific tract of land.

Prepared by P Chapman 1/05/2016

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-020-048

Route or Route Segment Name and/or Identifier: Fremont County Road 28 (FCR 28), Fremont County Road 31 (FCR 31), BLM 6170, BLM 6170 A, BLM 6170 B.

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-020-048 Wilderness Characteristics Inventory Map

Map Date: 2013

Describe:

The map shows the parcel inventoried for wilderness characteristics, photo points 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 of Route:

Describe:

- FCR 28: Is currently in use for general transportation, managed by Fremont County.
- FCR 31: Is currently in use for general transportation, managed by Fremont County.
- BLM 6170: Is currently in use for motorized recreation purposes as well as BLM administrative use.
- BLM 6170 A, B: Is currently in use for motorized recreation purposes.

B. Right-of-Way (ROW):

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

Yes No Unknown

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

- FCR 28 has a ROW association, serial # COC 44142
- FCR 31 has a ROW association, serial # COC 44142

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

Yes No Unknown or N/A

Explain:

Yes, the above stated routes have the ROWs still in use.

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

- Routes, FCR 28, FCR 31, BLM 6170 BLM 6170 A and BLM 6170 B are constructed and improved by mechanical means.

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

Yes No

Describe:

- FCR 28 has evidence of mechanical construction, the route is paved.
- FCR 31 has evidence of mechanical construction, the route is graveled.
- BLM 6170 has evidence of mechanical construction, bladed with road base fill added on the surface to a width of 16 feet.
- BLM 6170 A, B has evidence of mechanical construction, bladed.

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

Yes If "yes", improvements by? Hand Tools by Machine
No

Describe:

- FCR 28 has evidence of mechanical improvements such as culverts, and bridges.
- FCR 31 has evidence of mechanical improvements such as built stream crossings, and culverts.
- BLM 6170 has evidence of mechanical improvements such as water bars in place.
- BLM 6170 A, B has evidence of mechanical improvements such as water bars in place.

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

- FCR 28 is maintained for regular use by general transportation.
- FCR 31 is maintained for regular use by general transportation.
- BLM 6170 is maintained for access of full size vehicles.
- BLM 6170 A, B is maintained for access for full size vehicles.

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

Yes If "yes", maintenance by? Hand Tools by Machine
No

Explain:

- FCR 28 is regularly maintained by use of machinery.
- FCR 31 is regularly maintained by use of machinery.
- BLM 6170 has recently been maintained by use of machinery to expand the road.
- BLM 6170 A, B has recently been maintained by use of machinery to expand the road.

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 No

Explain:

- FCR 28, Fremont County would maintain the road if became impassable.
- FCR 31 would be maintained by Fremont County if became impassable.
- BLM 6170 would be maintained by the BLM if it became impassable.
- BLM 6170 A, B would be maintained by the BLM if it became impassable.

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

Yes X No _____

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).

- FCR 28 has regular and continuous use on it 70-100 times a day.
- FCR 31 has regular and continuous use, 50-70 times a day.
- BLM 6170 has use approximately 20-50 times a week.
- BLM 6170 A, B has use approximately 20-30 times a week.
-

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 X = Wilderness Inventory Road

No _____ = Not a road for wilderness inventory purposes

Explain:

- FCR 28 meets the criteria to be a wilderness inventory road.
- FCR 31 meets the criteria to be a wilderness inventory road.
- BLM 6170 meet the criteria to be a wilderness inventory road, it will be cherry stemmed within the unit.
- BLM 6170 A, B meets the criteria to be a wilderness inventory road; it will be cherry stemmed within the unit.

Evaluator: Janine Prout/ Recreation Assistant
 Evaluator: Linda Skinner/ Outdoor Recreation Planner

Date: August 27, 2013
 Date: December 14, 2015

PHOTO LOG

Photographer(s): Monica Mohr/ Rangeland Management Technician

Inventory Area Unique Identifier: **COF-020-048, Poverty Mountain**

Date	Frame #	Camera Direc.	Description	GPS/UTM Location	Township	Range	Sec.	Photo Point #
6/18/2013	P6180478	SE	Route condition	See map	19 S.	73 W.	24	1
6/18/2013	P6180479	N	Trail signs	See map	19 S.	73 W.	25	2
6/18/2013	P6180480	NE	Green pipe gate	See map	19 S.	73 W.	25	3
6/18/2013	P6180481	E	Veg. Treatment project.	See map	19 S.	73 W.	24	4
6/18/2013	P6180485	NE	Target shooting	See map	19 S.	73 W.	25	5
6/18/2013	P6180486	N	Route Condition	See map	19 S.	72 W.	20	6
6/18/2013	P6180487	W	Route Condition	See map	19 S.	72 W.	20	7
6/18/2013	P6180488	NW	Route condition	See map	19 S.	72 W.	17	8
6/18/2013	P6180489	NE	Route intersection	See map	19 S.	72 W.	17	9
6/18/2013	P6180490	E	Route Condition	See map	19 S.	72 W.	18	10
6/18/2013	P6180491	S	Route Condition	See map	19 S.	72 W.	18	11
6/18/2013	P6180492	SW	Route Condition	See map	19 S.	72 W.	18	12
6/18/2013	P6180493	NW	Route Condition	See map	19 S.	72 W.	18	13



#1



#2



#3



#4



#5



#6



#7



#8, Route BLM 6170



#9 intersection



#10



#11



#12



#13

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-020-048	Poverty Mountain	3,350.0	0	3,350.0

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