

**EVALUATION OF NEW INFORMATION SUGGESTING THAT AN AREA OF
PUBLIC LANDS HAS WILDERNESS CHARACTERISTICS**

Date of Submission: June 12, 2013

Proponent: Montana Wilderness Association (MWA)

Name of Area(s) Identified By the Proponent: Montana Wilderness Association's
Carpenter Creek (#326) and CMR Wagon
Coulee (#325)

BLM Field Office(s) Affected: Glasgow Field Office

This evaluation covers BLM's Carpenter Creek (MTM-2012-64) wilderness characteristics inventory unit as well as additional BLM acreage south of the Harpers Ridge Road and east of Barber Coulee and Southerland Creek Road for a total of 22,115 acres.

Evaluation

1. Does the submission include the required:

a) map which identifies the specific boundaries of the area(s) in question?

Yes X No

b) detailed narrative that describes the wilderness characteristics of the area and documents how that information significantly differs from the information in prior inventories conducted by BLM regarding the wilderness values of the area?

Yes X No

c) photographic documentation?

Yes X No

2. From the evidence presented by the proponent, as well as other relevant information (which may include documentation from prior BLM inventories, aerial photographs, field observations, maps, etc.), do you conclude that the information is significantly different from the information in prior inventories conducted by BLM regarding the wilderness values of the area or a portion of the area?

Yes X No

Explanation and Rationale:

The initial BLM inventory for these lands was conducted in 1979 and was identified as MT-064-326/Carpenter Creek and MT-064-325 CMR Wagon Coulee Tack-on. Additional parcels east and south of the Carpenter Creek unit, which did not meet the minimum size criteria for the 1979 inventory, are also included in this discussion. Carpenter Creek was not recommended for further wilderness consideration in BLM's November 1980 *Wilderness Final Intensive Inventory Decisions* in part because of flat topography and the lack of opportunities for solitude. Hunting was mentioned as the best recreational activity but it was not considered outstanding. CMR Wagon Coulee Tack-on, only 560 acres in size, was included in the 1979 inventory because it was adjacent to a CMR NWR proposed wilderness area but was not proposed for further consideration because it lacked topographic and vegetative screening making solitude opportunities limited. It was also considered too small for any outstanding recreational activities. The original inventory for these units was revisited and updated in March 2011 in preparation for the HiLine Draft Resource Management Plan. The original inventory unit for Carpenter Creek was split into two wilderness characteristics inventory units (Carpenter Creek MTM-2012-64 and CMR Wagon Coulee MTM-2012-65) during the 2011 inventory update with the new CMR Wagon Coulee Unit including the original 1979 CMR Wagon Coulee unit and the remainder of the adjacent BLM lands south of Harper Ridge Road. Both "new" inventory units still exceeded 5,000 acres and were reassessed for wilderness characteristics. BLM concluded in 2012 that Carpenter Creek did not meet the naturalness criteria for wilderness characteristics and that CMR Wagon Coulee was bisected by a wilderness inventory road and, therefore, did not meet the size criteria for wilderness characteristics.

MWA contends the routes BLM used to split the 2011 inventory units do not qualify as inventory roads and supports their position with a detailed narrative and geo-referenced digital images. MWA also asserts that BLM erred in their finding that Carpenter Creek does not meet the naturalness threshold due to presence of the 6-mile route that transects the unit from east to west and reservoirs scattered throughout the unit. MWA supports their position with additional narrative and geo-referenced digital images.

MWA also presents information on a variety of primitive recreational activities that considered together suggest outstanding opportunities for primitive forms of recreation. They include information on recreation activities the BLM did not document in their previous inventory. Further, MWA provides information on supplemental wilderness values that BLM did not document in their previous inventories.

Because MWA proposes a different unit boundary than the BLM considered in their previous inventories and provides additional information on apparent naturalness of the areas, opportunities for solitude and primitive recreation, and supplement wilderness values, the BLM concludes that the information MWA provides is new and significantly different from that considered in the BLM's previous inventories.

See the explanation to question #3 below for further discussion on the differences between the information MWA provides and the information the BLM considered in their previous inventory.

3. From the evidence presented by the proponent, as well as other relevant information (which may include documentation from prior BLM inventories, aerial photographs, field observations, maps, etc.), do you conclude: *(Check a or b below.)*

a) that the decision reached in previous BLM inventories remains valid.

(or)

b) that there is a reasonable probability that the area(s) in question (or a significant portion(s) thereof) may have wilderness characteristics.

Explanation and Rationale:

MWA proposes an LWC (lands with wilderness characteristics) unit of 22,115 acres, which exceeds the minimum requirement of 5,000 acres. BLM calculations find the proposed unit to be approximately 14,603 acres (a little more than 7,500 acres less than reported by MWA) which still exceeds the minimum size requirement to be considered. The boundaries they use follow county or well-maintained roads and ownership boundaries. The MWA proposal narrative is complete and has all the required information, including geo-referenced digital images. MWA's report provides new information on all 3 wilderness characteristics, (size, naturalness & outstanding opportunities for solitude or a primitive and unconfined type of recreation), and includes additional information on supplemental values.

BLM staff conducted a field inspection of the Carpenter Creek proposed LWC in mid-July 2013. BLM staff also reviewed the previous BLM wilderness characteristics inventories, aerial photographs and maps in preparing this evaluation.

Boundary Delineation

BLM staff reviewed MWA's proposed unit boundaries on site July 16, 2013. BLM staff concluded that the original boundaries for the Carpenter Creek MTM-2012-64 wilderness characteristics inventory unit are accurate with the exception of the Troika Recreation Area in the northeast corner which should have been clipped out of the 2011 unit due to high level of development at the site. This would reduce the size of the 7,441 acre 2011 inventory unit by approximately 90 acres, bringing the total to 7,351 acres.

BLM staff completed a route analysis on the Sutherland Creek Road (BLM Sutherland Creek Road and Sutherland Creek Spur; MWA Route 326c) between Carpenter Creek MTM-2012-64 and CMR Wagon Coulee MTM-2012-65 and concluded that this route meets the definition of a wilderness inventory road. Portions of the Sutherland Creek Road and the Harper Ridge Road are County roads. BLM maintains that Carpenter Creek should retain the 2011 inventory unit boundary since it is over 5,000 acres in size but the remainder of the proposed MWA unit is broken up into units smaller than 5,000 acres by wilderness inventory roads. The following discussion applies only to the Carpenter Creek inventory unit.

The Sutherland Creek Road (MWA Route 326c) receives maintenance on an as needed basis and meets the definition of a wilderness inventory road so all BLM lands east of this road were correctly excluded from the Carpenter Creek LWC inventory unit and dropped from further LWC consideration, since they comprise less than 5,000 contiguous acres of public land.

The northeast boundary of the inventory unit should be clipped to exclude the Troika Recreation Area from Willow Creek Road to Sutherland Creek Road. The recreation area contains many man-made features that are readily apparent to the average viewer, including a reservoir and dam with rock-lined spillway, 3 graveled camping pads each with a picnic table and fire ring, and a graveled parking area with a vault toilet. This area will continue to be developed and maintained by BLM as a recreation area.

Naturalness and Outstanding Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

BLM's initial inventory (1979) stated, "With the exception of the 640 acres of Private land which has been cultivated and is served by a jeep trail, the unit appears to remain in its natural condition. Based on this, the unit appears to have potential for further wilderness study." The unit was later disqualified for future wilderness consideration in part because of lack of topography and opportunities for solitude. Hunting was identified as the best recreational activity but was not considered outstanding. The 2011 wilderness characteristics inventory update disqualified Carpenter Creek because it didn't meet the naturalness criteria based on:

- A two-track route approximately 6 miles long bisects this unit from west to east and provides access to private land that is surrounded by BLM lands. This route provides access for hunting Block Management. Portions of this route have been bladed and maintained in the past.
- Portions of 3 grazing allotments overlap the unit with several miles of interior fence and 3 additional miles of vehicle routes used mainly by permittees and hunters.
- Several reservoirs are scattered throughout the unit with the reservoir in the northeast corner of the unit being relatively large.

MWA accessed the area from several available access points and found solitude and outstanding opportunities for primitive recreation like camping, hiking, rock hounding, hunting, exploring, photography, and bird watching. MWA contends the unit has ample opportunities for both solitude and primitive recreation and provided detailed narrative and digital images to support their position.

MWA asserts that the "area receives relatively little use due to its location and inaccessibility" and that "much of the area is not accessible by the public road". In fact, Harper Ridge Road and the Sutherland Creek Road are public (mainly County) access roads and are highly traveled during the hunting season. These routes are maintained with large equipment on an as needed basis and improvements such as culverts and hard water crossings have been installed in the past.

Based on the information MWA provides, the BLM concludes that portions of the Carpenter Creek proposed LWC may have wilderness character. First, MWA proposes a wilderness unit with a different, larger boundary than the BLM considered in their inventories. Second, MWA argues that the larger size of their proposed unit and its varied landform do provide outstanding opportunities for solitude. While BLM disagrees with MWA that Carpenter Creek should be combined with CMR Wagon Coulee Tack-on and other BLM lands to the east, the BLM concurs that the Carpenter Creek MTM-2012-64 unit, minus the Troika Recreation Area, does meet the minimum naturalness criteria and is sufficiently large and varied to potentially provide opportunities for solitude. Third, MWA cites a number of primitive recreation activities that can

be enjoyed in the area, more than those the BLM identified in their previous inventories. BLM concurs that there are what could be considered outstanding big game hunting opportunities in the unit and there are also a diversity of additional primitive recreational activities that do or can take place in the unit. MWA provides information on supplemental wildlife, cultural and scenic values. BLM didn't identify any supplemental values in in the 1979 and 2011 inventories but there are some known paleontological sites in the unit.

Summary

The BLM concludes the information Montana Wilderness Association presents on the Carpenter Creek proposed LWC unit warrants further consideration. Based on a review of the information submitted by MWA and a review of other pertinent information, BLM staff determined that the conclusion reached in previous BLM inventories was no longer valid based on the assessment in July 2013. The BLM now concludes that the Carpenter Creek inventory unit (MTM-2012-64), as revised, narrowly meets the threshold to consider it having wilderness characteristics and is identified as lands with wilderness characteristics. It needs to be stressed that this unit narrowly met the wilderness characteristics criteria during the mid-summer on-site visit. A copy of the Montana Wilderness Association's Carpenter Creek proposed LWC (#326) "citizen submitted information" will be maintained in the permanent documentation file for the Carpenter Creek (MTM-2012-64) wilderness characteristics inventory unit.

The following staff and information sources were used in arriving at this determination.

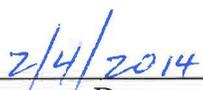
Kathy Tribby – Outdoor Recreation Planner
Abel Guevara – Wildlife Biologist
Alex Burke – Law Enforcement Ranger
Ray Neumiller – Rangeland Management Specialist
Steve Klessens – Rangeland Management Specialist (retired)
Brian Hockett – Planning & Environmental Coordinator
Pat Gunderson – Glasgow Field Office Manager

Reference Material:

- Draft HiLine Resource Management Plan and Environmental Impact Statement
- BLM Manual 6310 – Conducting Wilderness Characteristics Inventory on BLM Lands
- BLM Manual 6320 – Considering Lands With Wilderness Characteristics in the BLM Land Use Planning Process
- Montana Fort Peck West Surface Management Status 1:100,000-Scale Topographic Map
- Charles M. Russell National Wildlife Refuge Guide Map and Information
- GIS-generated Orthophoto Maps



Field Manager, Glasgow Field Office



Date

This form documents information that constitutes an inventory finding on wilderness characteristics. It does not represent a formal land use allocation or a final agency decision subject to administrative remedies under either 43 CFR parts 4 or 1610.5-3.