

# Lands with Wilderness Characteristics In the Bureau of Land Management Royal Gorge Field Office:



*Rocky Mountain Bighorn Sheep in the Browns Canyon South proposed LWC*

*Photo: John Sztukowski*

**Submitted to the BLM Royal Gorge Field Office on May 6, 2015 by**



**2013 - 2015**



# **Lands with Wilderness Characteristics In the Bureau of Land Management Royal Gorge Field Office:**

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## Introduction

The Bureau of Land Management (BLM) Royal Gorge Field Office (RGFO) manages 680,000 acres of public lands in central and eastern Colorado. Much of this land is in the Arkansas River Canyonlands corridor from Salida, CO to Cañon City, CO, near the iconic Royal Gorge, which the field office is named after. However other BLM land in this region stretches north into Lake and Park Counties, south to the southern end of the Sangre de Cristo Mountains, and east to the Front Range and beyond to the eastern plains.

The land that the BLM RGFO manages is very diverse. Much of this land, particularly in the Arkansas River corridor, consists of pinion pine, junipers, and sagebrush in the lower altitudes, with many cliffs and gulches that support riparian life and deciduous trees such as Gambel oaks and narrowleaf cottonwoods. As elevations increase, mid-elevation mixed forests of ponderosa pine, Colorado blue spruce, Douglas fir, and quaking aspen take hold, and often give way to montane grasslands near the mountaintops.

Many animal species make seasonal and permanent homes in this vast landscape. Large mammals living in this region include Rocky Mountain bighorn sheep, black bear, elk, mule deer, white-tailed deer, pronghorn, mountain lion, and swift fox. Many bird species take refuge in this region as well, including the bald eagle and the American peregrine falcon, which are listed as species of most concern, and the threatened species Mexican spotted owl.

The BLM RGFO region encompasses a number of existing Wilderness Study Areas (WSAs) totaling approximately 77,765 acres. However, there are many more wild lands in this region that offer the potential to conserve exceptional wilderness and wildlife in central Colorado, as well as protecting outstanding primitive recreational opportunities. In the face of increased energy development in Colorado, particularly oil and gas, as well as ever-growing recreational use and military operations pressures, it is ever more imperative to identify and preserve Colorado's unique public wild lands.

In March 2012, the BLM issued new manuals, Manuals 6310 and 6320, for inventorying and managing Lands with Wilderness Characteristics (LWCs) on the public lands. These manuals provide the agency's regional field offices with direction for implementing its legal obligations to inventory the public lands for wilderness characteristics under the Federal Land and Policy Act (FLPMA). Manual 6310, Conducting Wilderness Characteristics Inventory on BLM Lands, sets guidelines on assessing and inventorying lands for wilderness characteristics. Manual 6320, Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process, guides the BLM on addressing identified lands with wilderness characteristics in planning processes. Additionally, FLPMA includes a provision that BLM "preserve and protect certain public lands in their natural condition" (43 U.S.C. § 1701(a)(8)).

BLM Manual 6310 further states that the BLM regional office must review a citizen-submitted lands with wilderness characteristics inventory that meets the minimum standard for review of new information. The following report meets the minimum standards because it includes maps of sufficient detail, detailed narratives that describe the wilderness characteristics of the area (and

documents how the information differs from that of the BLM inventory), and photographic documentation (BLM Manual 6310 at .06(B)(1)(b)). Furthermore, Manual 6310 states that the BLM must “document the rationale for the findings, make the findings available to the public, and retain a record of the evaluation and the findings as evidence of the BLM’s consideration” (BLM Manual 6310 at .06(B)(2)).

From 2013-2015, Wild Connections inventoried potential lands with wilderness characteristics in the Royal Gorge Field Office region, using the new BLM manuals as guidelines. Our inventory teams completed field inventory on about 290,000 acres of potential lands with wilderness characteristics. We assessed these lands based on the criteria and policies set forth in Manual 6310. Therefore, we inventoried based on size of the unit, qualities of naturalness, outstanding opportunities for solitude or primitive and unconfined recreation, and supplemental values. Establishing more than 1,200 geotagged photopoints with detailed field notes, we also documented boundary roads, cherrystemed roads and other routes, additional infrastructure, terrain and ecology, and other factors that may demonstrate the importance of managing specific areas for protection.

The lands described in this report meet the Bureau of Land Management’s criteria for wilderness characteristics, and possess outstanding wilderness qualities that deserve protection from activities and uses that would otherwise degrade their wilderness values. We urge the BLM Royal Gorge Field Office to reevaluate its own inventory of these areas to conserve the exceptional wilderness qualities that they provide. We believe that Wild Connections’ inventories clearly demonstrate that these areas meet BLM’s criteria for Lands with Wilderness Characteristics in accordance with BLM Manual 6310, and we request that each of these areas be added to BLM’s LWC inventory.



*Turkey Creek, Beaver Creek WSA East  
Contiguous Units  
Photo: John Stansfield*

## Methodology

In early 2013, Wild Connections conducted an initial “Desktop” inventory, using aerial imagery and GIS analysis, to identify priority areas in the Royal Gorge Field Office region that may qualify for lands with wilderness characteristics based on the size criteria. From 2013 to 2015, Wild Connections conducted citizen-led inventories into 27 of these priority areas, totaling approximately 290,000 acres, following the protocols and criteria in BLM Manual 6310, Conducting Wilderness Inventories on BLM Lands. Wild Connections found lands with wilderness characteristics totaling approximately 246,000 acres over 24 areas in the RGFO region.

In February 2014, the BLM Royal Gorge Field Office released its *Lands with Wilderness Characteristics Inventory Update*, which identified 40 individual polygons totaling 77,765 acres as potential lands with wilderness characteristics. The BLM inventoried 89 total areas for lands with wilderness characteristics, totaling 257,324.9 acres. Wild Connections’ citizen-led inventory confirms many conclusions of the BLM’s initial inventory; however, it reveals that numerous significant gaps exist in the BLM’s inventory.

While we appreciate the inventory efforts made by the BLM to identify potential lands with wilderness characteristics, the method by which these areas were identified has led to errors, which until rectified, render the inventory inadequate to inform planning decisions. Specifically, we identify four major issues arising from the BLM’s inventory that should be addressed as BLM refines and updates the LWC inventory:

- 1) **The BLM uses an “overly strict approach to assessing naturalness” in the lands with wilderness characteristics inventory, which is cautioned against in Manual 6310.** The BLM does not find naturalness on many of the units that were inventoried due to cumulative minor human impacts. As noted above, the BLM does not provide sufficient evidence to support many of these assertions. Furthermore, BLM Manual 6310 requires that, “Caution should be used in assessing the effect of relatively minor human impacts on naturalness. Some human works are acceptable so long as they are substantially unnoticeable. Avoid an overly strict approach to assessing naturalness” (BLM Manual 6310 at .06(C)(2)(b)(ii)(2)). Additionally it should be noted that BLM Manual 6310 refers to naturalness as to whether or not an area looks natural to the average visitor (BLM Manual 6310 at .06(C)(2)(b)(ii)(1)(b)). Most important, the BLM’s strict use of naturalness appears to be derived from only inventorying impacted areas of a unit. The majority of the BLM field inventories do not venture from motorized routes, failing to inventory the greater unit as a whole, including the natural areas that predominantly comprise these units. Lastly there appear to be inconsistencies in BLM’s reports from unit to unit with regard to determining the effects of human impacts on naturalness.
- 2) **Many of the LWC unit reports do not provide the necessary photo and geo-referenced data that is required in BLM Manual 6310.** The BLM dismisses many units, asserting that the units do not meet the naturalness characteristics protocol laid out in BLM Manual 6310. However, the BLM does not provide photo documentation or geographic location to support its assertions as required in the “Wilderness Characteristics Inventory Process” section of BLM

Manual 6310 (BLM Manual 6310 at .06(B)(4)). The BLM Royal Gorge Field Office does not provide photo or geo data on 30 of the 62 individual areas that were not found as lands with wilderness characteristics, including large areas such as Upper Red Canyon (COF-020-070-A) and North of Cotopaxi (COF-020-056). Furthermore, BLM reports that do provide photo and geo-referenced data are typically insufficient to support report assertions that deem an entire unit unnatural, for example at Echo Canyon (COF-020-019), Thirtyone-Mile Mountain (COF-020-061), Crampton Mountain (COF-020-049), Eightmile Mountain (COF-020-050), and Race Path (COF-020-054).

- 3) **Some of the BLM defined boundaries 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” (BLM Manual 6310 at .06(C)(1)). The 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” (BLM Manual 6310 at .07). 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 no longer being maintained by mechanical means is not a road (Ibid)*. The BLM generally used the above definitions to determine unit boundaries; however, there are some units where an arbitrary boundary line was drawn, excluding contiguous lands with wilderness characteristics, for example in Badger Creek North (COF-020-018), Bear Mountain (COF-020-071), Cooper Mountain (COF-020-017), and Red Canyon (COF-020-070).
- 4) **The BLM inventory does not make any attempts to exclude human impacts by redrawing unit boundaries.** There are some units where the human impacts are near the boundaries of the BLM inventoried unit. The BLM dismisses large areas for not possessing naturalness character due to human impacts, which can easily be excluded by redrawing the unit boundaries, for example Race Path (COF-020-054), Echo Canyon (COF-020-019), North of Cotopaxi (COF-020-056), Eightmile Mountain (COF-020-050). “Human impacts outside the area will not normally be considered in assessing naturalness of an area” (BLM Manual 6310 at .06(C)(2)(b)(iii)).

In order to inventory the boundary and interior roads and routes within a potential LWC unit, and to properly assess if they meet the criteria for wilderness inventory roads, Wild Connections spent the spring of 2013 through the spring of 2015 visiting each possible LWC unit and documenting route conditions. During this time, Wild Connections utilized new technologies including iPad Minis, with internal GPS units, to precisely assess BLM boundary delineations, such as routes constructed and maintained by mechanical means to ensure regular and continuous use, as well as substantially noticeable human impacts, and other qualifying features. We inventoried approximately 290,000 acres of BLM lands, taking over 3,300 geotagged photos in the process, and made route determinations on countless roads and ways.

This report is intended as a resource for public land agencies, conservationists, and other interested parties who are concerned with sustainable management and protection of wilderness-quality lands, wildlife habitat and linkages, native species, and primitive recreation opportunities found on these lands. Wild Connections has taken great care to ensure the accuracy of our



fieldwork, but we would be pleased to discuss any substantive documentation that would improve the data. We are confident that the information collected and condensed into report format here is the most extensive inventory effort conducted for this field office to date, and should provide invaluable information to the BLM and to the public about the areas within the RGFO that meet the criteria for LWCs.

We will continue to update and amend our inventory as more information and/or resources become available to us.

## Wild Connections’ proposed Lands with Wilderness Characteristics in BLM’s Royal Gorge Field Office region

Map ID	Name	BLM LWC ID	Acres
1	Reinecker Ridge	COF-020-082	4,310
2	Beaver Creek WSA East Contiguous Units: Crown Point	COF-020-006	152
2	Beaver Creek WSA East Contiguous Units: Little Fountain Creek	COF-020-007	192
2	Beaver Creek WSA East Contiguous Units: Turkey Creek	COF-020-009	2,444
3	Beaver Creek WSA West Contiguous Units: East Fork	COF-020-035	935
3	Beaver Creek WSA West Contiguous Units: East Fork Creek	COF-020-062	1,268
3	Beaver Creek WSA West Contiguous Units: NE Phantom Canyon	COF-020-063	1,187
3	Beaver Creek WSA West Contiguous Units: NE Steel Bridge	COF-020-036	549
3	Beaver Creek WSA West Contiguous Units: NW corner	COF-020-020	59
3	Beaver Creek WSA West Contiguous Units: Red Rock Subdivision	COF-020-010	146
3	Beaver Creek WSA West Contiguous Units: S1	COF-020-033	208
3	Beaver Creek WSA West Contiguous Units: S2	COF-020-011	40
3	Beaver Creek WSA West Contiguous Units: SE Phanton Canyon Road	COF-020-034	589
4	Cooper Mountain	COF-020-017/COF-020-017-A	25,523
5	Booger Red/Bare Hills/The Bank	COF-020-070/COF-020-070-A	23,054
6	Thompson/Gribble/Twin Mountains	COF-020-050	19,214
7	Cottonwood Creek	COF-020-049	5,120
8	Thirtyone Mile Mountain	COF-020-061	7,514
9	Waugh Mountain	COF-020-041	5,591
10	Browns Canyon South	COF-020-005	2,448
11	Chipeta Pahlone Foothills		2,886
12	Table Mountain Echo Canyon	COF-020-019	31,633
13	Bear Mountain/West Table Mountain	COF-020-071/-A/-B	13,296
14	Badger Creek/Jack Hall Mountain	COF-020-018/COF-020-069	12,248
15	Sand Gulch/Falls Gulch Mountain	COF-020-056	17,558
16	Badger Creek South	COF-020-022	8,147
17	Sangre de Cristo Foothills Contiguous Units: Bear Gulch	COF-020-058	277
17	Sangre de Cristo Foothills Contiguous Units: Box Canyon		1,449

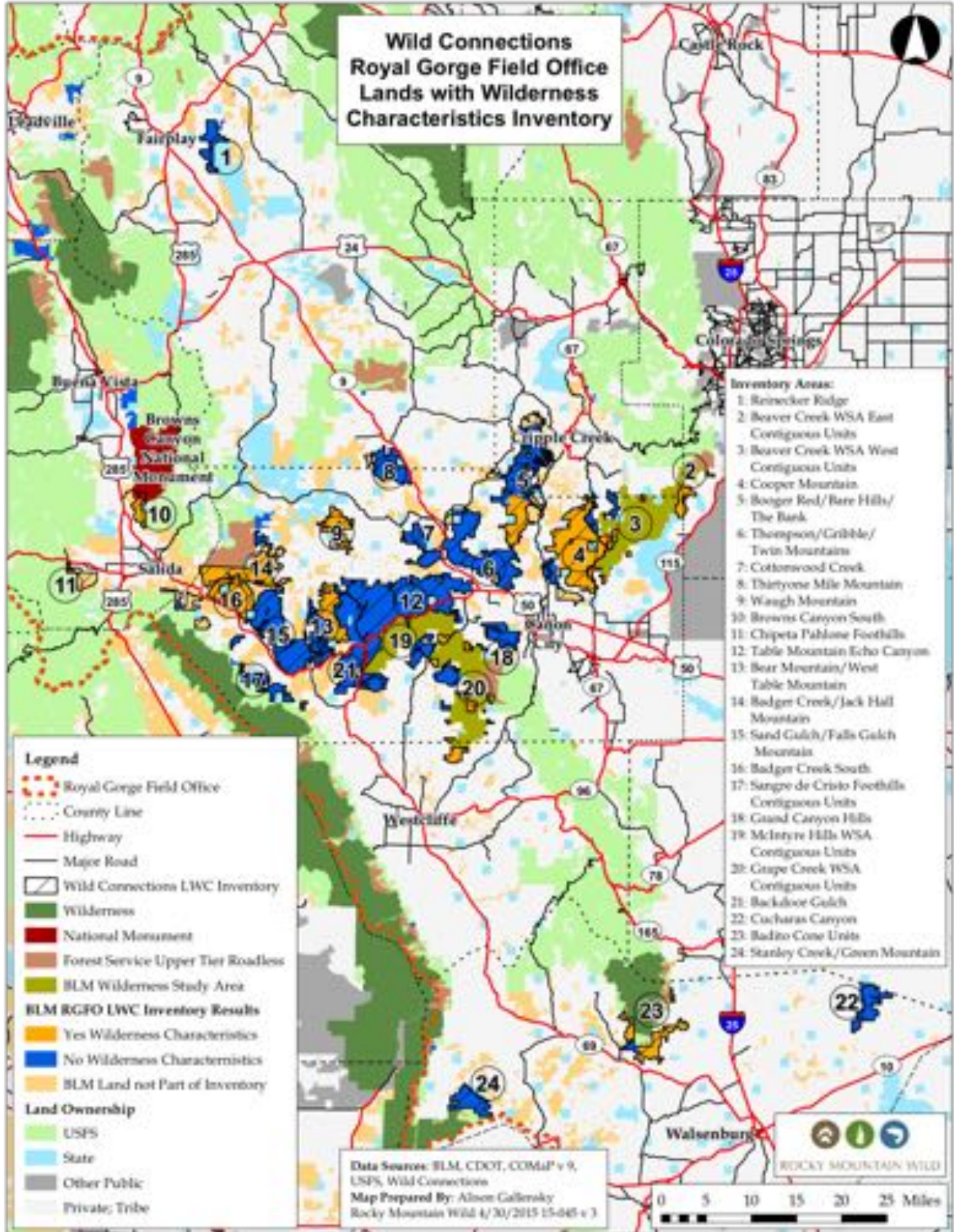
17	Sangre de Cristo Foothills Contiguous Units: Castle Gardens		713
17	Sangre de Cristo Foothills Contiguous Units: Cottonwood Creek	COF-020-089	496
17	Sangre de Cristo Foothills Contiguous Units: East Kerr Gulch	COF-020-065	1,854
17	Sangre de Cristo Foothills Contiguous Units: Kerr Gulch	COF-020-040	342
17	Sangre de Cristo Foothills Contiguous Units: Mosher Creek		225
17	Sangre de Cristo Foothills Contiguous Units: Palmer Gulch		71
17	Sangre de Cristo Foothills Contiguous Units: Pole Gulch	COF-020-038	1,592
17	Sangre de Cristo Foothills Contiguous Units: South Howard	COF-020-067	605
17	Sangre de Cristo Foothills Contiguous Units: Taylor Gulch		1,109
18	Grand Canyon Hills	COF-020-061	5,008
19	McIntyre Hills WSA Contiguous Units: Copper Gulch	COF-020-008	672
19	McIntyre Hills WSA Contiguous Units: McIntyre Gulch	COF-020-039	1,857
19	McIntyre Hills WSA Contiguous Units: McIntyre Gulch SE	COF-020-039	300
19	McIntyre Hills WSA Contiguous Units: Poverty Mountain	COF-020-048	3,358
19	McIntyre Hills WSA Contiguous Units: Road Gulch	COF-020-076	3,120
19	McIntyre Hills WSA Contiguous Units: Sheep Basin	COF-020-047	203
19	McIntyre Hills WSA Contiguous Units: Texas Creek Gulch	COF-020-046	2,416
20	Grape Creek WSA Contiguous Units: War Dance Mine	COF-020-012	459
20	Grape Creek WSA Contiguous Units: Pierce Gulch	COF-020-013	242
20	Grape Creek WSA Contiguous Units: Iron Mountain	COF-020-051	28
20	Grape Creek WSA Contiguous Units: Westfall Gulch	COF-020-014	113
20	Grape Creek WSA Contiguous Units: Bull Domingo West	COF-020-015	236
20	Grape Creek WSA Contiguous Units: Horseshoe Mt-Adamic	COF-020-030	147
20	Grape Creek WSA Contiguous Units: Marsh Gulch	COF-020-016	479
20	Grape Creek WSA Contiguous Units: East Pierce Gulch	COF-020-021	815
20	Grape Creek WSA Contiguous Units: Goat Park	COF-020-023	138
20	Grape Creek WSA Contiguous Units: Dead Mule	COF-020-025	1,788
20	Grape Creek WSA Contiguous Units: BH Subdivison	COF-020-026	41
20	Grape Creek WSA Contiguous Units: Horseshoe Mt-Adamic 2	COF-020-031	74
20	Grape Creek WSA Contiguous Units: Susie's Ridge	COF-020-088	2,831
20	Grape Creek WSA Contiguous Units: Hellgateway North	COF-020-028	42
20	Grape Creek WSA Contiguous Units: Pine Gulch	COF-020-024	391
20	Grape Creek WSA Contiguous Units: North of Bear Gulch, Grape Creek	COF-020-029	348
21	Backdoor Gulch	COF-020-054	6,720
22	Cucharas Canyon	COF-020-042	6,061
23	Badito Cone Units: Apache Creek	COF-020-003	326
23	Badito Cone Units: Arroyo Hondo	COF-020-002	535
23	Badito Cone Units: Badito Cone South	COF-020-001/COF-020-001-A	5,813
23	Badito Cone Units: Badito Cone West	COF-020-087	954
24	Stanley Creek/Green Mountain	COF-020-037	5,474





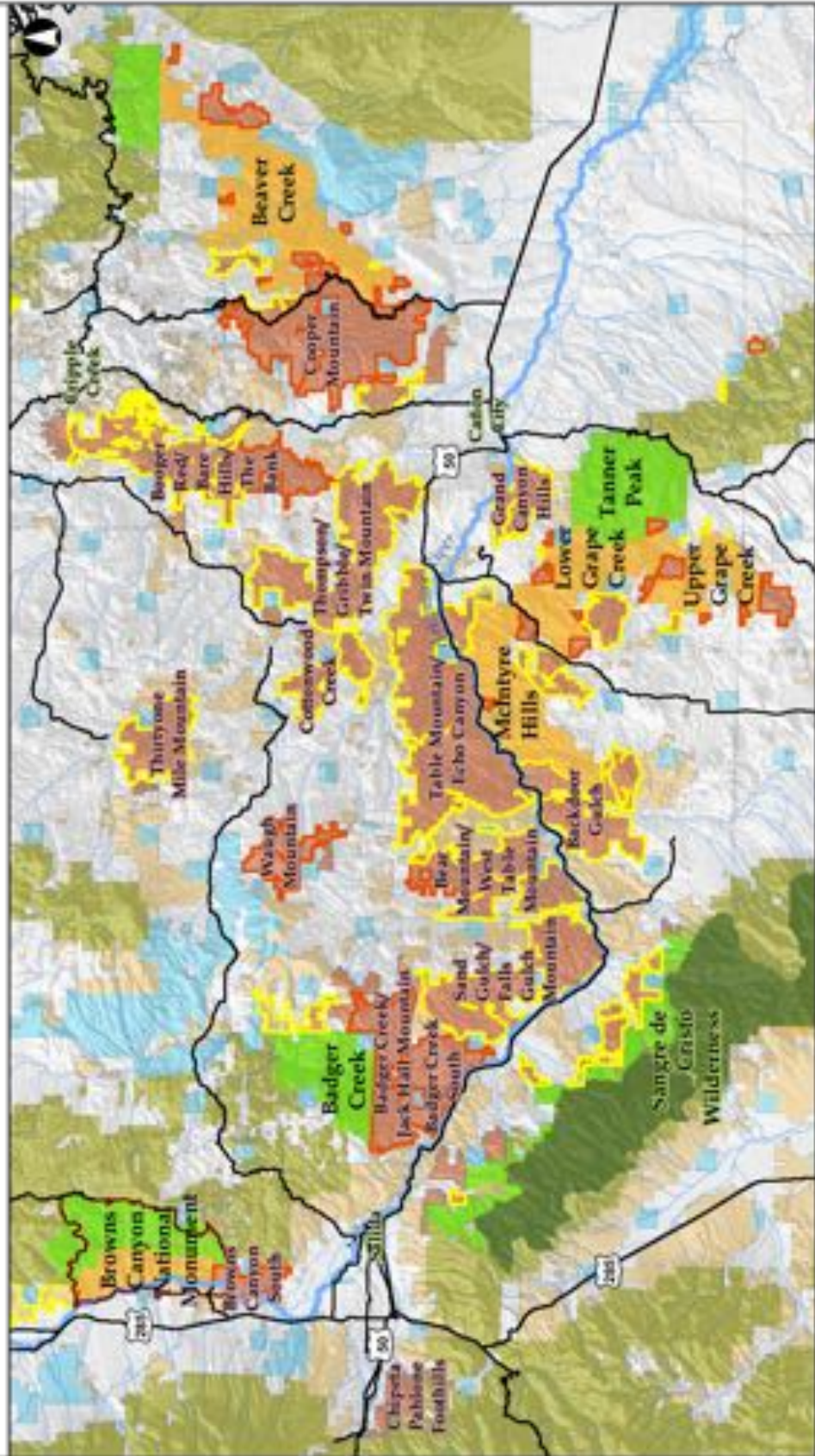
# Wild Connections

FROM THE MOUNTAINS TO THE PRAIRIES





## Wild Connections' Wilderness Characteristics Inventory along the Arkansas River



**Legend**

- Road
- Browns Canyon National Monument
- Arkansas River
- Stream
- Lands with Wilderness Characteristics

**BLM LWC Inventory**

- BLM Found Wilderness Character
- Did Not Find Wilderness Character
- BLM Wilderness Study Area
- USFS Roadless Area
- Sangre de Cristo Wilderness

**Land Owner**

- BLM
- State
- Other Public
- Private/Tribe

**Data Sources:**  
BLM, CDOT, USGS, Wild Connections

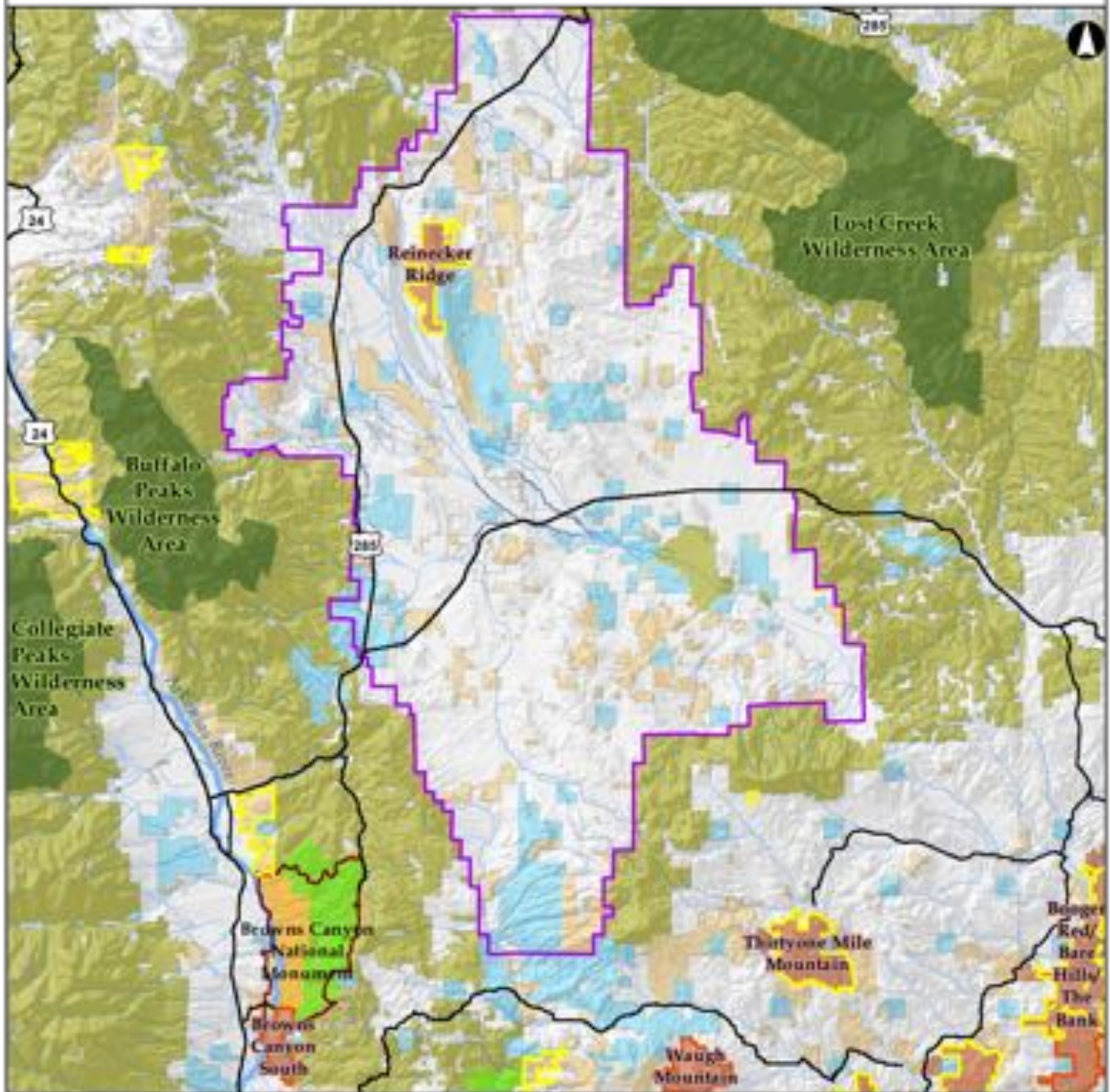
**Map Prepared by:**  
Rocky Mountain Wild  
4/13/2015 15-045 v3

0 1 2 3 4 5 10 Miles

ROCKY MOUNTAIN WILD



## Wild Connections' Wilderness Characteristics Inventory in South Park



<b>Legend</b>	<b>BLM LWC Inventory</b>	<b>Land Owner</b>	<b>Data Sources:</b>
— Road	BLM Found Wilderness Character	BLM	BLM, CDOT, USGS,
— Major Road	Did Not Find Wilderness Character	State	Wild Connections
Proposed South Park MLP	BLM Wilderness Study Area	Other Public	<b>Map Prepared by:</b>
Browns Canyon National Monument	USPS Roadless Area	Private/Tribe	Rocky Mountain Wild
Arkansas River	Wilderness		4/13/2015 15-045 v3
Lands with Wilderness Characteristics			
Stream			

0 1 2 3 4 5 10 Miles

ROCKY MOUNTAIN WILD



## Credits and Acknowledgments

### **Wild Connections**

Wild Connections is dedicated to protecting the network of wildlands that will sustain biodiversity, wildlife and wildlife habitat for our own and future generations in central Colorado, specifically the upper Arkansas and South Platter watersheds.

Wild Connections was established in 1995 to map roadless areas of the Pike-San Isabel National Forest and adjacent large BLM roadless areas. Trained volunteers mapped more than 100 areas, and incorporated this information, biological data and input from local workshops in to the *Wild Connections Conservation Plan*. This science-based regional ecosystem strategy is part of the network of wildlands in western North America.

Thanks to our active volunteer member board for their contributions on this project:

Jim Lockhart, President

John Stansfield, Vice President

Alison Gallensky, Treasurer/Secretary

Misi Ballard

John Chapman

Tom Mowle

Claude Neumann

Deb Overn

Lee Patton

Kristin Skoog

Jean Smith, Founder and Board Member Emeritus

Tod Bacigalupi, former board member

### **The Wilderness Society**

The Wilderness Society (TWS) is an American conservation organization that works to protect our nation's shared wildlands. They have conducted lands with wilderness characteristics inventories for other regional BLM field offices, and have been an invaluable resource for our organization. Also thanks to Soren Jespersen, Juli Slivka and their BLM Action Center for providing resources and feedback throughout this project.

### **Rocky Mountain Wild**

Rocky Mountain Wild (RMW) protects the biological diversity of the Rocky Mountain West. Thanks to Alison Gallensky for her GIS consulting, creating the LWC overview and individual unit maps, and providing an Assessment of Biological Impact (ABI) for each of the inventoried areas.

### **EcoFlight**

Based out of Aspen, CO, EcoFlight educates and advocates for the protection of remaining wild lands and wildlife habitat through the use of small aircraft. We offer a special thanks to EcoFlight's founder and pilot Bruce Gordon and program coordinator Michael Gorman for the flight over six of our priority LWC areas, garnering beautiful aerial views and providing clarity on difficult to access areas.



### **Wild Connections Mapping Interns and Volunteers**

We would like to thank our 2013 and 2014 summer mapping interns for their invaluable time and service spent on field preparation, field mapping, and report composition. Our 2013 mapping interns were Jaimie Reiss (Metro State University – Denver), Ryan McCarley (Metro State University – Denver), Will Schaar (Metro State University – Denver), and James Howe (Denver University). Our 2014 mapping interns were Brian Smith (Metro State University – Denver), Larkin McCormick (Denver University), and Jacob Twersky (Colorado College). Their contributions are noted on the respective unit reports that they took the lead on.

In addition, Wild Connections trained 65 volunteers who contributed countless hours in the field to the inventory effort. Special thanks to all of those who made a contribution to this project!

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Central Colorado Wilderness Coalition

Greater Arkansas River Nature Association (GARNA)

Pikes Peak Sierra Club

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Mt. Evans Sierra Club

New-Land Foundation

Norcross Wildlife Fund

Patagonia Denver

Pew Charitable Trust, Western Lands Initiative

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