











White River Field Office Backcountry Conservation Area Proposal

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One reason sportsmen continue to experience high-quality hunting and fishing on public lands is because of backcountry areas administered by the Bureau of Land Management (BLM). These areas contribute to America's \$821 billion outdoor recreation-based economy and national identify. Yet for too long, the debate over backcountry lands management has been framed as a choice between two opposites: high-intensity development or complete preservation. A widely supported middle-ground management designation that conserves appropriate BLM-administered backcountry habitat does not exist- but is needed. Consequently, the current system of land management planning is leaving valuable fish and wildlife habitat vulnerable to poorly planned development and is causing widespread public frustration.

Sportsmen want to see a balanced conservation designation that safeguards intact fish and wildlife habitat, hunting and fishing, and other dispersed recreation opportunities while allowing reasonable management activities that benefit habitat and protect the health and safety of the American people. We believe this proposal for Backcountry Conservation Areas (BCA) in the White River Field Office (WRFO) will enable the BLM to effectively conserve high value public lands in a way that enjoys considerable public support.

Hunting, Big Game and Energy Development in the WRFO

The WRFO of NW Colorado offers some of the finest big game hunting in the country. CO Division of Parks and Wildlife Game Management Units 11 and 21 are legendary for producing world class mule deer bucks and quality elk year after year. Hunters travel to NW Colorado every fall to enjoy the long standing outdoor tradition of hunting, leaving their money with guides and outfitters and at hotels, restaurants and other establishments. It is imperative that the WRFO conserve intact fish and wildlife habitat for the future of sportsmen in America.

Most of the WRFO lies within the Piceance Basin, an area once known as the 'mule deer factory' due to the tens of thousands of deer found there. While the Piceance Basin is still home to the largest migratory mule deer herd in North America and hosts thousands of big game hunters every year, the deer population is in decline.

The area also hosts strong populations of elk and pronghorn and the area is one of the few in the state where the public is still able to harvest sage grouse.

Much of the White River Drainage was once abundant with native Colorado River Cutthroat trout. Currently, only 4.6 of the 51.2 historical stream miles of CRCT habitat remain on BLM lands in the WRFO. The remaining stream miles, near East Douglas Creek, are approximately 9% of historical miles, which is well under the current 14% remaining across the species' entire range.

The basin also includes large reserves of natural gas (estimates of over 100 trillion cubic feet) and has been, more recently, recognized as a hotbed for potential oil shale development. Currently, there are over 1,800 producing wells in the Piceance Basin and estimates suggest as many as 16,000 wells could be present in the next 15 years. If this development proceeds without strong safeguards for intact fish and wildlife habitat, our prized resources could see serious impacts and our hunting and fishing opportunities could decline.

Hunters and anglers have learned firsthand about the negative impacts of energy development on their heritage. Sportsmen in Wyoming have seen a reduction in hunting opportunities for mule deer and sage grouse in places such as the Pinedale Anticline and Powder River Basin in Wyoming. Sportsmen want to see their hunting opportunities maintained in NW Colorado and it is imperative that the BLM's WRFO take a balanced, disciplined and thorough approach to developing the area's energy resources. This should include an effort to conserve the areas remaining backcountry lands to safeguard the area's world-class fish and wildlife habitat and hunting and fishing traditions. This can be done in a way that allows for the responsible development of the area's energy resources.

Given the high-volume predictions for energy development in the WRFO, this planning process might represent the last opportunity to conserve some of the last remaining backcountry lands in NW Colorado. Unless the BLM acts now, these fundamentally important areas, and the fish and wildlife they sustain, could be lost into perpetuity.

Value of Backcountry Lands

Backcountry public lands provide enormous social, cultural, economic, scientific and ecological benefits to the public. Our organizations are focused on the conservation of backcountry areas to ensure the continued conservation of unfragmented fish and wildlife habitat and high quality hunting and fishing lands. Backcountry landscapes offer the settings and backdrops for dispersed recreation and provide quality habitat for numerous fish and game species. These areas represent some of the last and best intact habitat for species dependent on large, undisturbed areas of land, such as sage grouse, pronghorn, mule deer, elk, and bighorn sheep. These areas serve as bulwarks against the spread of nonnative invasive plant

species and provide reference areas for study and research. Managing an area to protect its backcountry character keeps large swaths of public lands intact and accessible for future generations of Americans to enjoy. Intact backcountry lands are scarce and are becoming more so by the day. Their conservation must be a high priority for the BLM.

Existing administrative land designations do not specifically address backcountry areas

Our organizations have significant experience working with rank and file sportsmen and hunting and fishing organizations and businesses across the West to conserve high quality fish and wildlife habitat and sporting opportunities. We have a unique and clear understanding of the issues and concerns that sportsmen, rural residents and wildlife managers voice towards the management and conservation of public lands. While most Americans agree that high-value intact public lands should be conserved, existing tools being used by the BLM to conserve these lands are often misunderstood and are looked upon with suspicion by the general public.

The existing situation of land management is not only resulting in unnecessary difficulty for all parties working to conserve high quality public lands (including the BLM), it is resulting in fewer acres conserved. As a result, the few remaining backcountry fish and wildlife areas remain vulnerable to industrial development and people are frustrated with the current situation of public lands management.

To meet its obligations under the Federal Lands Policy and Management Act (FLPMA), the BLM employs administrative designations that facilitate the conservation of high-value lands, such as Areas of Critical Environmental Concern and Research Natural Areas. While these existing designations provide the necessary tools to conserve lands and can be effective in the right circumstances, the titles and terminology of these designations are often not understood by people who live near and use these public lands. Rural Westerners and recreation enthusiasts such as sportsmen often are suspicious of these designations, and communicating their meaning requires considerable time and effort. As a result, the long-term success of preexisting administrative designations has been limited to few areas and high value lands have been left at risk to inappropriate development.

The public also has a difficult time understanding the concept of stipulations that are applied to conserve key resource values, such as broadly applied stipulations for fish and wildlife habitat. While these stipulations are very important and must be used to protect sensitive fish and wildlife habitat and other resources, the BLM should spend additional time engaging the public in the management of actual places with high resource and recreation values that are well known by name to local residents, sportsmen and recreational users.

BLM should consider a Backcountry Conservation Area designation

In order to resolve conflict and conserve high quality lands, we recommend the WRFO RMP Amendment utilize a Backcountry Conservation Area designation that safeguards high value fish and wildlife habitat and dispersed recreation opportunities on specific, identifiable areas that possess backcountry character.

As proposed, we believe the BCA designation would enjoy widespread public support from local residents, hunters, anglers, businesses, recreational users, fish and wildlife managers and others because it addresses the management of specific places that are known to users and is presented in a way that is easily understood and supported by the public. Such an approach would help to more effectively engage the public in the planning process and ease the tension over public lands management while ensuring that the BLM is conserving high value public lands as required under Section 202 of FLPMA.

The BCA designation would emphasize the conservation of backcountry fish and wildlife habitat and a non-motorized, outdoor recreation experience on lands that deserve to stay intact and accessible in the face of ongoing energy development. This designation would seek to maintain the characteristics of backcountry lands and would represent a conservation-focused multiple-use framework that allows for reasonable vegetation management exceptions to benefit fish and wildlife habitat and protect people from wildfire, while ensuring that undeveloped BLM lands maintain their backcountry character. This designation would also maintain existing access points and would not close motorized access on preexisting authorized and permitted routes that are important for public recreation.

This designation would safeguard existing dispersed non-motorized recreation opportunities that benefit from large, undisturbed landscapes, such as hunting, fishing, horse packing, camping, mountain biking, cross-country skiing, rafting and rock climbing.

The BLM has broad authority to designate areas in RMPs, including RMP Amendments

We recognize that the BCA land allocation designation is currently not included in the BLM land use planning handbook as an administrative designation. It should be noted that the BLM has the authority and flexibility under Section 202 of FLPMA to conserve lands through administrative designations and the BLM has exercised this authority by creating unique administrative designations at the land use planning level.

For example, in the developing RMP for the Lower Sonoran Field Office and Sonoran Desert National Monument, the BLM is creating two designations to protect priority wildlife species and habitat in the planning area through "Wildlife Habitat Areas" and "Wildlife Movement Corridors." These designations are included in the preferred alternative of the DEIS and proposed RMP.

A second example of the BLM using their authority to create an administrative designation can be seen with the Lander RMP where the BLM created the Heritage Tourism and Recreation Management Corridor designation. This is designed to preserve not only the physical traces of the National Historic Trails, but also their historic settings.

These designations demonstrate:

1. The BLM has the authority at a state, district and field office level to conserve lands through administrative designations that are consistent with the BLM's obligations under the Federal

- Land Policy and Management Act (FLPMA), 42 U.S.C. §1701, et seq., and National Environmental Policy Act (NEPA), 42 U.S.C. §4321, et seq.
- 2. The agency has demonstrated a willingness to designate and conserve native fish and wildlife habitat through the use of a new designation.

Many westerners want to see a middle-ground conservation designation that conserves unfragmented fish and wildlife habitat and recreation, such as hunting and fishing, while allowing reasonable exceptions that benefit our traditions and protect the health and safety of the American public. By instituting the BCA designation in the WRFO RMPA, the BLM would be exercising its authority to create a balanced, multiple use conservation designation that conserves high quality fish and wildlife habitat and recreation values.

Proposed areas for WRFO BCA designation

We propose that the following areas be designated as BCAs in the WRFO RMPA. These areas represent much of the last best remaining backcountry areas in the WRFO and deserve conservation safeguards for the benefit of hunters, anglers and many other users of public lands. All of these lands possess high-quality fish and wildlife habitat and provide high-quality non-motorized recreation opportunities and are of sufficient size as to make practicable their conservation.

Please see the accompanying appendix for more detailed information on fish and wildlife values, including maps.

Map Group	BCA	Acres
	E. Douglas Creek	17,541
	Oil Spring Mtn E	6,795
Α	Oil Spring Mtn W	8,412
	Whiskey Creek A (Dragon Canyon)	7600
	Whiskey Creek B	5216
	Evacuation	6765
	Big Ridge	24,952
	Raven Ridge	7,345
В	Coal Oil Rim A (W)	13,074
	Coal Oil Rim B	5,388
	Coal Oil Rim C E	9,026
	Shavetail	7580
	Blue Mountain	34,386
	Pinyon Ridge A (N)	9608
С	Pinyon Ridge B	9057
	Wolf Creek/Coyote Basin	9075
	Moosehead Mountain	6426
	Upper Greasewood Creek A	6574
D	Upper Greasewood Creek B	7174
	Upper Greasewood Creek C	10398
	Upper Greasewood Creek G	5712
E	Colorow Mountain A (N)	5018
	Colorow Mountain B (S)	5977
Total		229,099

Management direction for BCA's

The WRFO should incorporate the following standards into BCA management to ensure their conservation by:

- Conserving specific, intact BLM backcountry areas with high-quality fish and wildlife habitat and/or significant recreation opportunities, such as hunting and fishing.
- Keeping areas open to hunting, fishing, trapping and other outdoor recreation and ensuring that the Colorado Division of Parks and Wildlife retains management authority over fish and wildlife populations.
- Maintaining authorized roads, ways and motorized trails that are important for sportsmen to access BLM backcountry areas for hunting and fishing (at the time when travel management is conducted, but not precluding seasonal closures).
- Restricting the construction of new roads, ways and motorized trails within designated areas pursuant to emergencies and valid existing rights and prohibiting cross-country vehicle travel to conserve unfragmented habitat and hunting and fishing opportunities.
- Limiting vegetation management to projects that improve fish and wildlife habitat, control noxious weeds, restore forests and rangelands and reduce the risk of wildfire. This could include projects that restore sage brush and quaking aspen or control cheat grass. Such projects should be developed in a way that maintains the backcountry character of BCAs.
- Allowing prescribed burning to mimic natural processes, herbicide application to maintain and restore native vegetation and the installation of water developments that benefit wildlife.
- Allowing chainsaws, helicopters and equipment for land management projects, while maintaining the character of backcountry areas.
- Conserving fish and wildlife habitat by requiring that utility corridors, pipelines and conventional and renewable energy development be located outside the boundaries of designated areas, with the exception of existing infrastructure and projects pursuant to outstanding rights. These restrictions should not be waivable and all oil and gas leases within BCAs should receive no surface occupancy stipulations. Surface development associated with an existing oil and gas lease within a BCA should be conducted in a manner that minimizes effects on surface resources, prevents unnecessary or unreasonable surface disturbance, and complies with all applicable lease requirements, land and resource management plan direction, regulations, and laws. Roads constructed should be obliterated when no longer needed for the purposes of the lease or upon termination or expiration of the lease, whichever is sooner. Upon lease expiration, undeveloped BLM lands within the BCA boundary should revert to the BCA management direction outlined herein.
- Honoring valid existing rights, maintaining public lands grazing allotments and protecting the ability of ranchers to maintain agriculture improvements.
- Allowing the suppression of range and wild land fires utilizing mechanized equipment.



Guzzlers, like this one in the Blue Mountain proposed BCA, provide wildlife with a perennial water source while having little disturbance on the overall landscape. Habitat improvements like this would be allowed in BCA's. Photos: Nick Payne 2012 and Bryant Olsen 2011.







Backcountry Conservation Areas can offset large-scale development already occurring in the White River Field Office. BCA's represent a balanced approach to safeguarding some of the last and best fish and wildlife habitat and public hunting lands in the WRFO.

Pictured: Deserado Coal Mine, East of Dinosaur, CO. Nick Payne 2012.



Colorado River Cutthroat Trout

Three species of native cutthroat trout are currently found in Colorado, one of which, the Colorado River Cutthroat Trout (CRCT), has current and historic range on BLM lands in the WRFO. Locally, it is found in only 9% of its historic range, mostly near the East Douglas Creek drainage in the southern portion of the field office.

Efforts are on-going in the sporting community to enhance and restore populations of CRCT in this area. There are several miles of historic streams and roughly two miles of population expansions within the boundaries of the proposed East Douglas Creek BCA (with an extant population) and four miles within the proposed Whiskey Creek A and Whiskey Creek B BCAs. Roads and development in this area could increase sediment loads and decrease the likelihood that these native trout could be sustained and restored.

Applying the BCA designation would safeguard these watersheds and allow for possible CRCT population expansion in several miles of current and historic habitat.



Colorado River Cutthroat trout are becoming rarer due to loss of habitat and invasive fish, such as brook trout. The East Douglas Creek proposed BCA would safeguard roughly two miles of cutthroat habitat and several miles of stream suitable for population expansion. Photo: Nick Payne 2011.

Sage Grouse

Sage grouse have been hunted throughout the West for generations. Currently, nine of the eleven states containing extant sage grouse populations have an active, but extremely limited, harvest program. This large grouse species was once abundant, and often called the "sage chicken," until recent declines of 30% across its range and 90% in certain locales over the last 100 years has led to the possibility of listing the species under the Endangered Species Act. In 2010 the U.S. Fish and Wildlife Service determined that the listing of the sage grouse was warranted but precluded due to budget constraints and higher priority candidate species. Because of this decision, and the great implications of listing the sage grouse, the BLM WRFO must find ways to safeguard grouse populations before listing. This can be accomplished by instituting the right conservation practices in the right locations to preclude the need to list the species as threatened or endangered. This is in the best interest of all multiple uses (energy development, grazing, and hunting & fishing, etc.).

The primary goal of the field office should be to maintain and increase current sage grouse populations and their distribution through conservation measures that safeguard current populations and enhance and restore sage brush habitat throughout the species' range. 14 of the proposed BCAs offer over 80,000 acres of important sage grouse habitat and their conservation would represent an important starting component for the long-term conservation of this species in Colorado. Ultimately, populations should be increased to levels where they are secure from local extirpation, and eventually to levels that allow for an annual harvestable surplus of sage grouse across its range.

Conclusion

The undersigned sporting and conservation organizations request that the White River Field Office, through the Resource Management Plan Amendment process, recognize the included areas as Backcountry Conservation Areas, a designation that conserves backcountry BLM lands with high-quality fish and wildlife habitat and recreation opportunities, such as hunting and fishing. All land use planning processes addressing energy development on prized fish and wildlife habitat and recreation lands should integrate input from affected stakeholders, including hunters and anglers. It is imperative that the BLM recognize and commit to lands worth conserving while recognizing lands suitable for development.

We appreciate the opportunity to be involved in the NEPA process for the WRFO RMPA. We will be working with sportsmen, recreationists, ranchers, business owners, local, state and national decision-makers and others to build support for these areas throughout the NEPA process. We urge the WRFO to include these lands in the Draft RMPA for consideration by the public. We look forward to working with the BLM at all levels as this process continues.

Sincerely,

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Please send future correspondence to the address above and to:

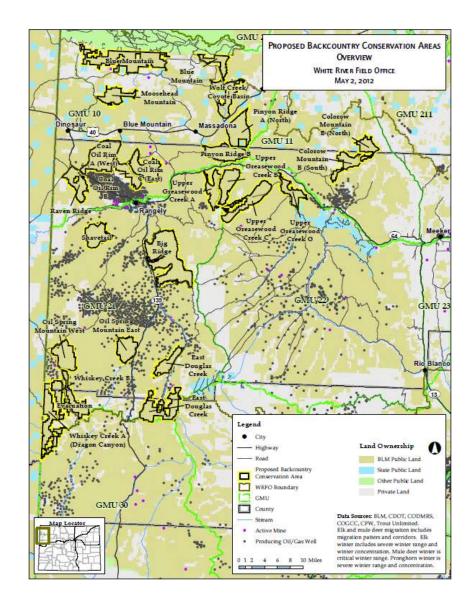
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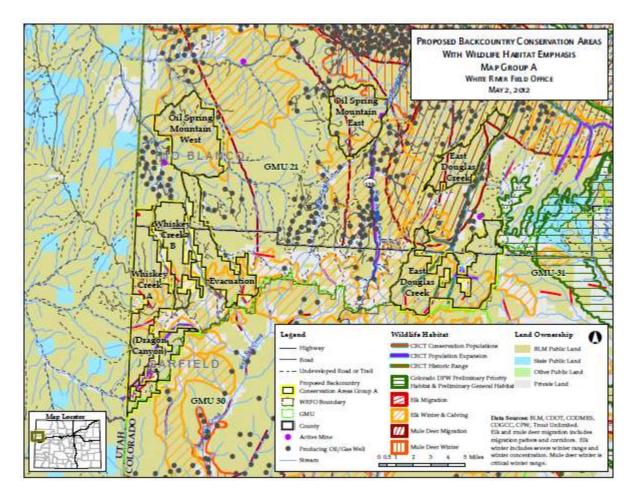
David Hayes, Dept. of Interior Deputy Secretary
Bob Abbey, BLM Director
Neil Kornze, BLM Acting Deputy Director
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Appendix A- Proposed BCA sportsmen value descriptions with maps (229,099 acres)

From a sportsman's perspective, these lands represent some of the last and best unfragmented and undeveloped hunting and fishing lands in the WRFO. It is important that they stay intact and accessible. These areas also have been identified as crucial habitat for fish and wildlife species, ensuring a high quality experience. Amongst these proposed BCA's are areas ranging from extremely remote, to bordering population centers and intense development. Taken together, they safeguard the traditions and values of the whole spectrum of sportsmen.



Map Group A



All of the proposed BCA's in Map Group A lie within the Colorado DPW **Game Management Unit** (**GMU**) **21**. This GMU is one of the state's most productive in terms of total mule deer and black bear harvest¹. The BLM and CO DPW are the only agencies managing public lands in this GMU, making these proposed BCA's extremely crucial in safeguarding public lands hunting opportunity, especially considering the world-class mule deer found in the WRFO.

East Douglas Creek (17,541 acres) offers some of the only cutthroat trout habitat on BLM lands in the WRFO. The area offers quality primitive hunting opportunities with very few roads and trails. It serves as a mule deer and elk migration route and provides crucial winter and calving habitat for elk.

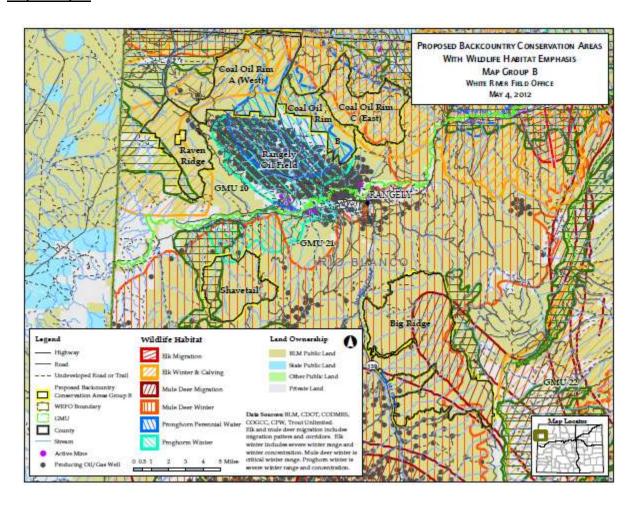
Oil Spring Mountain East (6,795 acres) serves as crucial mule deer winter range and elk crucial winter habitat. The area also offers quality primitive hunting opportunities. The southeastern boundary of the

¹ Throughout the document, GMU's identified as "one of the most productive or hunted" are those GMU's in the 70th percentile for either total harvest or total recreation days/hunters/days hunted, statewide in 2009 (Data from the CO DPW, 2009).

area is shaped by lower West Douglas Creek, which serves as part of the Colorado River cutthroat trout population expansion. The area is easily accessed via Hwy 139 and various jeep and BLM trails.

Oil Spring Mountain West (8,412 acres), Whiskey Creek A (Dragon Canyon) (12,564 acres), Whiskey Creek B (5,216 acres) and Evacuation (6,765 acres) form a complex in the most Southwestern area of the field office boundary. Whiskey Creek A and Whiskey Creek B both contain suspected Colorado River cutthroat trout habitat and roughly four miles of streams have been identified for population expansion. The complex is very remote, providing access via unmaintained roads, ways and two track trails. The area provides crucial winter, migration and reproductive habitat for elk, which use BLM public lands in nearby Utah and Colorado.

Map Group B



The proposed Big Ridge and Shavetail BCAs also lie within the prized Colorado DPW Game Management Unit (GMU) 21. As mentioned, this GMU is one of the state's most productive for total mule deer and black bear harvest and BLM lands offer the most accessible public-lands hunting opportunities in the unit.

Big Ridge (24,952 acres) serves as mule deer crucial winter and migration habitat and has been recognized in 2012 as important sage grouse habitat by the Colorado DPW. The area offers quality primitive hunting opportunities with easy access and close proximity to both Rangely and Dinosaur.

Shavetail (7,580 acres) is a very remote area to the Southwest of Rangely. Its borders are formed by ways and roads. Mule deer concentrate in this area during the winter months. Over 4,000 acres of important Sage grouse habitat runs through the heart of this proposed BCA. Its proximity to Rangely results in a short trip for some quality backcountry hunting.

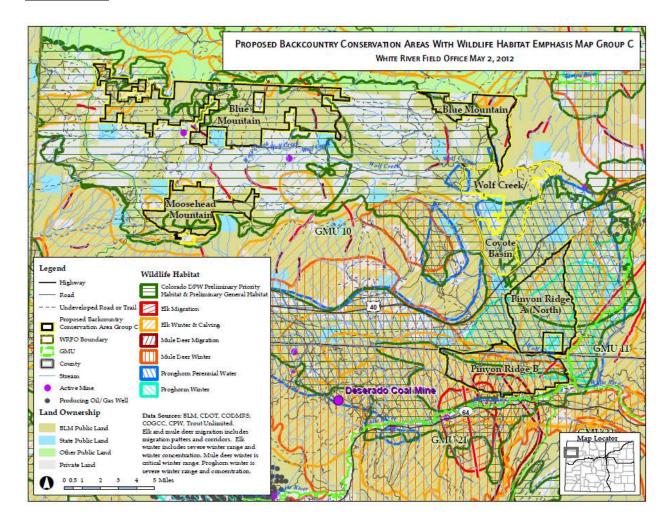
Raven Ridge (7,345 acres) provides elk with wintering habitat and has been recognized by the CO DPW as important habitat for Sage grouse. Pronghorn antelope use the area frequently during the winter. The eastern border is shared with the Rangely Oil Field, run by Chevron, which comprises over 34,000 acres of heavily developed lands. This large block of infrastructure, including pipelines, roads and transmission lines, is surrounded by the proposed Raven Ridge BCA and three Coil Oil Rim proposed BCA areas, totaling 34,833 acres of mostly undisturbed BLM lands. Conserving Raven Ridge and adjacent areas will help to strike a necessary balance between industrialized and primitive lands in the immediate Rangely area.

Coal Oil Rim A (13,074 acres) and Coal Oil Rim B (5,388 acres) also border the Rangely Oil Field, with Coal Oil Rim C (9,026 acres) lying to the Northeast, divided from Coal Oil Rim B by a BLM dirt road. All three areas provide crucial winter habitat for elk, which tend to avoid the adjacent areas of development. Coal Oil Rim C provides crucial winter habitat for mule deer and pronghorn antelope, which also rely on the area as a perennial water source. A natural gas pipeline runs along the edge of Coal Oil Rim B to the east of County Road 1. All three areas are easily accessible from both Rangely and Dinosaur, offering some quality hunting opportunities in close proximity to shops and hotels. Conserving the Oil Rim areas will help to strike a necessary balance between industrialized and primitive lands in the immediate Rangely area.



Pronghorn antelope are common near the Coal Oil Rim proposed BCAs. They don't avoid the Rangely Oil Field in the same manner as elk and mule deer have been found to. Nick Payne 2012.

Map Group C



The Blue Mountain, Wolf Creek/Coyote Basin, Moosehead Mountain and Pinyon Ridge North proposed BCAs are in Moffat County, one of the few counties in the state with successful Sage grouse harvests, having over 285 hunters and 507 birds taken (most in the state) in 2009. Moffat County is also a valued Sharp-tailed grouse hunting area, with 193 days hunted in 2009, 2nd in the state.

Blue Mountain (34,387 acres) serves as an elk production area, grouse winter range and production area and mule deer migration area. The whole of this proposed BCA is recognized by the CO DPW as important habitat for Sage Grouse as well, as it is a trophy sage grouse area. The area is easily accessible via four-wheel drive vehicles and offers quality hunting opportunities. Livestock grazing is common on BLM lands in the vicinity.

Wolf Creek/Coyote Basin (9,075 acres) lies just to the North of Highway 40 and the Pinyon Ridge proposed areas. Much of the area has been recognized as important grouse habitat and the proposed BCA provides a perennial water supply for pronghorn antelope.

Moosehead Mountain (6,426 acres) serves as an elk migration route and provides elk with roughly 9,000 acres of crucial reproductive habitat. The area is fairly remote but provides access with ways and two-track trails.

Pinyon Ridge North (9,608 acres) and **Pinyon Ridge South** (9,057 acres) serve as a migration route for elk and mule deer and provide crucial winter and reproductive habitat for grouse. These proposed BCA's have also been recognized by the CO DPW as important habitat for sage grouse. The area offers quality primitive hunting opportunities with close proximity to sportsmen living in Rangely, Dinosaur and Meeker.



Pinyon-Juniper woodlands of the Moosehead Mountain area. Nick Payne 2012.

The proposed Upper Greasewood Creek A and Upper Greasewood Creek B Backcountry Conservation Areas also lie within the sought-after Colorado DPW **Game Management Unit (GMU) 21**. As mentioned, this GMU is one of the state's most productive for total mule deer and black bear harvest and BLM lands offer the most accessible public lands hunting opportunities in the unit.

Upper Greasewood Creek B and Upper Greasewood Creek C lie within the extremely productive Colorado DPW **Game Management Unit (GMU) 21**. This GMU was extremely productive for hunters seeking elk and mule deer with 794 elk and 339 mule deer harvested in 2009. Hunters clearly favor this GMU, as it accounted for 15,222 elk recreation days and 3,910 mule deer recreation days in 2009.

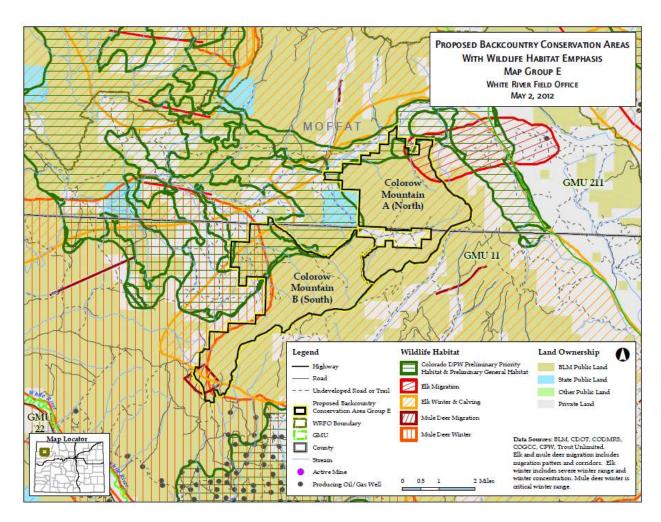
Upper Greasewood Creek A (6,574 acres), **Upper Greasewood Creek B** (7,174 acres), **Upper Greasewood Creek C** (10,398 acres) **and Upper Greasewood Creek G** (5,712 acres) form a nearly 30,000 acre complex near the Piceance Creek State Wildlife Area. The four areas are divided only by dirt roads, ways and two-track trails. Other large blocks of public land near Greasewood Creek that are located outside of the proposed BCA boundaries have been proposed for oil shale leasing. Combined,

these proposed BCA's provide undisturbed mule deer crucial winter and migration habitat, elk crucial winter, migration and reproductive habitat and have been recognized by the Colorado Division of Parks and Wildlife in 2012 as important habitat for sage grouse. Conserving these areas will help to strike a balance with proposed oil shale development in nearby areas.



Two elk bulls and one cow sited near the Upper Greasewood Creek A proposed BCA. Nick Payne 2012

Map Group E



State and BLM lands are the only public lands available to hunters in **GMU 11**, one of the most productive in the state for elk, mule deer, pronghorn antelope and sage grouse. Hunters took 1,368 elk, 480 mule deer and 160 pronghorn in 2009. This GMU accounted for an amazing 15,542 elk recreation days and 3,654 mule deer recreation days in 2009.

Colorow Mountain A (5,018 acres) and Colorow Mountain B (5,977 acres) are separated by a small dirt road, accessible only by four-wheel drive vehicles. The areas are significant in that they provide crucial elk winter, migration and reproductive habitat. Colorow Mountain B provides crucial winter and migration habitat for mule deer and both areas have been recognized as important for Sage grouse. The area is easily accessible from Highway 64 East of Rangely, resulting in a productive block of public lands for hunters in a fairly remote area.