

Vernal Field Office
Revisions to the *1999 Utah Wilderness Inventory*

Bureau of Land Management

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Section I Introduction

Purpose

This document explains the revisions that have been made to the *1999 Utah Wilderness Inventory* for the lands administered by the Vernal Field Office in northeast Utah. Public lands with wilderness character, as identified in the inventory and the revisions described in this document, are the subject of study in the Vernal Resource Management Plan (RMP) Revision. This document also addresses questions and concerns that were raised during the initial scoping phase of the statewide wilderness study area (WSA) planning project that began in March of 1999.

Since the release of the *1999 Utah Wilderness Inventory* in February 1999, and the initiation of statewide planning to determine if new WSAs should be designated on qualifying lands, numerous changes to the inventory have been made. Some modifications are the result of improved mapping data and the correction of technical errors in the maps that were published in the *1999 Utah Wilderness Inventory*. Other changes are due to the redrawing of wilderness inventory boundaries to eliminate state land sections located along the perimeter of inventory areas. Additional changes are the result of Bureau of Land Management (BLM) field reevaluations of certain inventoried lands and vehicle routes following public comment.

How This Document Is Organized

This document is organized in three sections:

Section I provides an introduction and background information on Utah's past WSA planning efforts and explains how public comments collected during the scoping phase for an earlier statewide WSA study process (1999) helped to refine the inventory. The section also contains information on the criteria used to evaluate wilderness character, and summarizes the acres found to have wilderness character within each of the nine inventory areas on the lands administered by the Vernal Field Office, as originally portrayed in the *1999 Utah Wilderness Inventory*.

Section II outlines all of the changes that have been made to the *1999 Utah Wilderness Inventory* as a result of public comments and further agency review. Modifications are explained and listed under five categories: 1) transfer of land ownership; 2) mapping corrections, 3) changes due to the exclusion of state lands along the perimeter boundaries of inventory areas, 4) changes in vehicle route cherry-stems; 5) and changes resulting from reevaluations of the wilderness character of certain inventoried lands and vehicle route determinations. A summary of all changes for each inventory area is provided at the end of this section.

Section III addresses many of the pertinent inventory-related questions and concerns that were identified during initial statewide public scoping. Comments pertaining to the wilderness character of specific locations and vehicle routes in individual inventory areas are addressed in this section of the document.

Background

On February 4, 1999, the Bureau of Land Management (BLM) released the *1999 Utah Wilderness Inventory*. Out of 3.1 million public land acres examined statewide (of which 135,860 acres were on lands administered by the Vernal Field Office), 2.6 million acres were found to have wilderness character. Wilderness character refers to the criteria from Section 2(c) of the *Wilderness Act of 1964*. Wilderness character criteria include size, naturalness, and outstanding opportunities for solitude or primitive and unconfined types of recreation. Qualifying areas must also be “roadless.”

In March of 1999, approximately six weeks after the release of the wilderness inventory findings to the public, the BLM, at the direction of then Interior Secretary Bruce Babbitt, initiated a statewide planning process to determine if any of the qualifying public lands should be designated as WSAs. WSAs are roadless areas or islands that have been inventoried and found to have wilderness characteristics as described in Section 603 of the *Federal Land Policy and Management Act* (FLPMA) and Section 2(c) of the *Wilderness Act of 1964* (78 Stat. 891), and that have been administratively designated as a wilderness study area. This interim administrative designation is designed to allow areas to be protected by BLM and considered by Congress for possible future designation as wilderness. Lands designated as WSAs are managed under the provisions of the Interim Management Policy and Guidelines for Lands Under Wilderness Review (IMP). IMP guidelines provide for a management regime designed to protect an area’s suitability for Congressional wilderness designation.

The consideration of new WSAs on BLM lands is being conducted in concert with other land use planning in accordance with the Bureau’s land-use planning and the *National Environmental Policy Act* (NEPA) procedures. This planning process provides the public an opportunity to participate throughout the subsequent planning steps leading up to a decision as to whether or not new WSAs should be designated in the Vernal Resource Management Plan (RMP) Revision.

Scoping and Public Involvement Process

The statewide 1999 WSA planning began with “scoping.” Scoping is the first of several public involvement steps during the WSA planning process, and provides the public with an opportunity to provide input. Public input has been instrumental in both the refinement of the wilderness inventory, in the identification of issues, and for future development of the alternatives that will be analyzed in the draft EIS for the Vernal RMP Revision.

To facilitate public review of the BLM’s wilderness inventory findings and promote awareness and understanding of public involvement opportunities during planning, the Bureau initiated an aggressive public information program. An electronic version of the *1999 Utah Wilderness Inventory* was published on the Internet on a website specifically designed for the statewide WSA planning project. Several hundred printed copies of the 300-page *1999 Utah Wilderness Inventory* were distributed across Utah and the rest of the nation. “Permanent documentation

files” containing aerial photographs, topographic maps, slides, detailed wilderness character evaluations, and other materials for each of the areas inventoried were also made available for public review. Copies of these files were placed in BLM offices across Utah. Complete copies of all files were also provided to the State of Utah for their review and distribution.

In addition to the WSA website, the BLM used several other public information methods to promote public involvement. Notifications in the *Federal Register* and media outlets of formal public scoping periods and public open houses, as well as numerous meetings, direct mailings, and other activities, were used to facilitate the information flow and encourage dialogue.

These efforts, coupled with a high degree of interest in the WSA issue, resulted in a large volume of public input submitted during the scoping phase of the statewide WSA planning project. Nearly 13,000 letters or other types of public input were received during the first six months of the project. While the majority of the input was from Utahns, scoping comments were received from every state in the nation as well as several foreign countries. Although a vast array of planning topics were covered, the majority of the scoping comments involved the wilderness character determinations made in the *1999 Utah Wilderness Inventory*. Many comments either agreed or disagreed as to whether or not certain lands had wilderness character, or agreed or disagreed as to whether certain vehicle routes were roads or ways (see Glossary for definitions of a road and way).

BLM Restructured The Planning Process To A Regional Approach

In November 1999, the BLM announced a restructuring of the WSA planning process in response to public feedback received during scoping and a Congressional moratorium on planning in a large portion of the West Desert region of Utah. Instead of preparing a single EIS for all inventory areas under study throughout the state, BLM announced the use of a staged approach, beginning with the southeast region of Utah. A preliminary draft EIS/Plan Amendment for the southeast region is currently under internal review. The regional planning amendment approach was designed to only make decisions about which areas should be designated as WSAs.

A New Approach Based On Congressional Direction to Revise Land Use Plans

Since initiation of the regional approach, Congress provided national funding to completely revise BLM land use plans in order to bring them up to date with current laws, rules, regulations, and policies. The land use planning approach will make decisions about the full spectrum of resource values and uses, not solely potential designation of new WSAs. The RMP Revision for lands administered by the Vernal Field Office is one of the first planning efforts scheduled for Utah.

Many of the wilderness inventory-related scoping comments submitted by members of the public in 1999 provided new information necessitating further Bureau review of specific lands and wilderness character findings in Vernal. Nearly all of the inventory areas administered by the Vernal Field Office were revisited by field personnel, many on several different occasions, in order to recheck areas and carefully consider the information provided by the public during the initial scoping.

The public involvement process, including the dissemination of inventory findings, public review and comment on those findings, and agency reevaluations as necessary, has led to an improved wilderness inventory to be used as a baseline for analysis in the Vernal RMP Revision.

Numerous modifications to boundaries have been made in many of the inventory areas under study. Details regarding these modifications are contained in supplemental information added to the permanent documentation files for each of the inventory areas. A summary of all changes that have been made as a result of BLM reevaluations is contained in Section II of this document.

Evaluation of Wilderness Character

Secretarial Direction

In 1996, then Secretary Babbitt directed the BLM to conduct what he described then as a “narrowly focused exercise directed at a unique problem: the extraordinary 20-year old Utah wilderness inventory controversy.” The Secretary’s instructions to the BLM were to “focus on the condition on the disputed ground today, and to obtain the most professional, objective, and accurate report possible so we can put the inventory question to rest and move on.” He asked the BLM to assemble a team of experienced career professionals and directed them to apply the same legal criteria used in an earlier BLM wilderness inventory, and to use the same definition of wilderness contained in the 1964 *Wilderness Act*.

The lands identified for the comprehensive “ground truthing” field review were those lands contained within proposed legislation before Congress at the time, HR 1500 and HR 1745. These legislative bills proposed wilderness designation for lands outside the boundaries of the 3.3 million acres of existing BLM WSAs previously designated during the early 1980s. These lands were the primary focus of the new field inventory initiative. Between 1996 and 1999 a total of 3.1 million public land acres were inventoried statewide, including 135,860 acres of BLM lands administered by the Vernal Field Office.

Wilderness Characteristics

Lands were evaluated according to the criteria specified in the *Wilderness Act of 1964*. The Act defines wilderness as an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvement or human habitation, which is protected and managed so as to preserve its natural conditions, and which:

- 1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable (refers to whether an area looks natural to the average visitor - apparent naturalness);
- 2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation;
- 3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and
- 4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

Qualifying lands must also be roadless. The definition of roadless that is used for wilderness inventory purposes is taken from the House Committee Report 94-1163, page 17, dated May 15, 1976, which forms part of the legislative history of the *Federal Land Policy and Management Act* (FLPMA). This definition is:

“The word ‘roadless’ refers to the absence of roads which have been improved and maintained by mechanical means to ensure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road.”

These criteria directed this inventory, as well as all previous BLM wilderness inventories.

Summary of Findings for Lands Administered by the Vernal Field Office Presented in the 1999 Utah Wilderness Inventory

On lands administered by the Vernal Field Office, 135,860 acres were inventoried for the presence or absence of wilderness character. Of the inventoried acres, 131,395 were found to possess wilderness character. Lands with wilderness character were found in all nine of the inventory areas.

Table 1-1 summarizes the wilderness character acres for inventory areas located on lands administered by the Vernal Field Office as presented in the *1999 Utah Wilderness Inventory* that was released for public review in February 1999.

Table 1-1: *1999 Utah Wilderness Inventory Findings for the Lands Administered by the Vernal Field Office*

Inventory Areas	Public Lands Inventoried (Acres)	Wilderness Character (Acres)
Bull Canyon	2500	2470
Cold Spring Mountain	12200	9500
Cripple Cowboy*	13700	13700
Daniels Canyon	3100	3100
Desolation Canyon**	82030	81425
Diamond Breaks	4500	4500
Moonshine Draw	3800	2700
White River	13500	13500
Wild Mountain	530	500
Total	135860	131395

* Includes 1,028 acres in Grand County/Moab Field Office

** Acreage figures apply only to the lands administered by the Vernal Field Office

Copies of the *1999 Utah Wilderness Inventory* are available from the BLM. An electronic color version of this document with all maps has also been posted on the BLM's wilderness study area planning project website www.ut.blm.gov/wilderness.

Section II Reevaluation of Inventoried Lands as a Result of Initial Statewide Scoping

The onset of the 1999 WSA planning project and its related scoping phase provided the public with the first opportunity to review and comment on BLM's inventory findings as described in the *1999 Utah Wilderness Inventory*. The thousands of comments that were submitted by the public during this initial phase of planning and BLM's "internal scoping" process, involving agency review and additional field work, have been extremely helpful in refining the inventory findings to identify the public lands with wilderness character that are subject to analysis in the Vernal RMP Revision. The refined inventory findings are considered the "planning baseline" for this RMP Revision. The planning baseline is the lands that have wilderness character in each of the nine inventory areas.

As a result of these internal and external reviews, adjustments have been made to the planning baseline in seven of the nine inventory areas under study in the Vernal RMP Revision. The changes can be broken down into five general categories: 1) transfer of land ownership; 2) mapping improvements and corrections; 3) the exclusion of state lands and contiguous federal land parcels too small for WSA consideration; 4) changes in vehicle route cherry-stems and/or roads; and 5) changes in wilderness character findings. Changes are described by inventory area in the sections that follow, and are shown on inventory area maps provided later in this section. Additional details are included in the permanent documentation files available for public review at the BLM office in Vernal, Utah, as well as in the Public Room at the Utah State Office in Salt Lake City, Utah.

Transfer of Land Ownership

In the Desolation Canyon inventory area, 23,082 acres of lands found to have wilderness character in the *1999 Utah Wilderness Inventory* were recently transferred to the Northern Ute Tribe by Congressional action. Because these lands are not administered by the BLM, they are no longer under consideration for WSA establishment through BLM's planning process.

Mapping Improvements and Corrections

The maps used in the *1999 Utah Wilderness Inventory* were digitized from the detailed field inventory and wilderness character maps drawn on USGS 7.5 minute topographic quadrangles by inventory crews. Since the development of these original maps, additional mapping information, primarily global position system (GPS) data provided by the State of Utah, Utah counties, private individuals, and BLM sources, has become available. Use of this improved mapping data and completion of additional field verification checks in many of the inventory areas have resulted in a number of mapping corrections. In addition, BLM cartographers closely compared the original maps found in the permanent documentation files with the maps published in the *1999 Utah Wilderness Inventory*, and found that several digitizing errors had been made. These errors have been corrected in the new planning baseline. Most of these changes involve very slight realignments of boundaries of the inventory areas.

Exclusion of State Lands and Contiguous Federal Land Parcels Too Small for WSA Consideration

During the reinventory process, BLM inventoried both federal and state lands. Consequently, state lands were included in the findings presented in the *1999 Utah Wilderness Inventory*. However, BLM has no authority to manage state lands and these lands are not being considered for new WSA establishment under the land-use planning process. Therefore, wilderness inventory area boundaries have been redrawn to exclude state lands.

In some cases, the exclusion of state sections has also resulted in the severing of BLM lands that were connected to the wilderness inventory areas only by state lands. A total of 760 acres of BLM lands found in four different inventory areas were dropped from consideration due to this factor. These inventory areas are listed below along with the federal acres that were severed.

Cold Spring Mountain	242	acres
Diamond Breaks	80	acres
White River	40	acres
Wild Mountain	<u>398</u>	<u>acres</u>
TOTAL	760	acres

Changes in Cherry-stems

Cherry-stems are inventory area boundaries that exclude substantially noticeable intrusions. Cherry-stems can be formed by dead-end roads, vehicle ways when they are substantially noticeable intrusions, or other significant human disturbances that impact natural character. Cherry-stems are not considered part of the inventory area.

Some inventory findings regarding cherry-stems have been modified as a result of public comment and further agency review. In some cases cherry-stems have been added. In other cases, cherry-stems have been removed or shortened. Overall, changes to cherry-stems have modified the planning baseline in four inventory areas.

All vehicle routes that meet the BLM road definition used for wilderness inventory purposes have been cherry-stemmed. The Chipeta Canyon Road in the Cripple Cowboy inventory area is an example of a road cherry-stem. This road provides access to a BLM cabin. The road was constructed, is maintained by the BLM, and receives regular and continuous use by recreationists and BLM personnel. This road penetrates the inventory area and ends at the cabin. Beyond the cabin, the character of the road changes and becomes a vehicle way.

In one instance, a vehicle route that was determined to be a way because it does not meet the BLM road definition, constitutes a substantially noticeable intrusion, and has been cherry-stemmed. This is in the Desolation Canyon inventory area. The route was constructed but does not receive regular or continuous use, and is not maintained. The route was originally bladed and

provided access to two old drill pads. The route has not naturally reclaimed and is very evident on the ground. Surface disturbance associated with this route has substantially impacted natural character, and the route is therefore cherry-stemmed.

The following list identifies where changes have been made to the planning baseline related to cherry-stems and/or roads that form inventory area boundaries.

<i>Bull Canyon</i>	One cherry-stem removed.
<i>Desolation Canyon</i>	One cherry-stem added; one road added; one cherry-stem shortened.
<i>Diamond Breaks</i>	One cherry-stem removed.
<i>Moonshine Draw</i>	One cherry-stem removed.
<i>White River</i>	One cherry-stem added.

Changes in Wilderness Character Findings

Numerous changes to the baseline inventory have been made due to a reevaluation of inventoried lands. Two types of changes have been made: the removal or addition of large parcels (more than 100 acres) of BLM land, and the removal of small parcels (less than 50 acres) of BLM land due to human disturbances that impact natural character.

The Addition or Removal of Large Parcels (more than 100 acres) of BLM Lands

Reevaluations of wilderness character have resulted in a reversal of the BLM's initial findings in several instances. Three parcels of public land were initially inventoried and found not to have wilderness character. Subsequently, they were reevaluated, found to have wilderness character, and added to two inventory areas. The paragraphs below summarize the changes and reasons for these modifications in each of the affected inventory areas.

Moonshine Draw:

Addition of 1,101 acres

Approximately 1,101 acres located in the southeastern portion of the inventory area have been added to the planning baseline because they were found, upon further review, to possess wilderness character.

This area was determined to lack wilderness character in the 1996-1999 wilderness inventory because of the cumulative impact of vehicle ways, a fence, and stock ponds associated with livestock grazing. Due to public comment and lack of photographic documentation on this area, a second field review was conducted in the summer of 2001. The field team identified the existence of two vehicle ways, both of which were determined to be substantially unnoticeable. A fence was found on the eastern side of the inventory area, and determined not to be a substantial

intrusion. Four stock ponds were located within the area, two of which are located near the southern boundary of the inventory area. Cumulatively, these impacts were determined to be unsubstantial in the area as a whole because they are widely scattered and small in size and scale. Therefore, the area was found to be natural in character (naturally appearing to the average visitor) and has been added to the planning baseline. The two stock ponds adjacent to the southern boundary have been excluded with the boundary road.

White River:

Addition of 728 acres

Two areas, totaling approximately 728 acres, have been added to the planning baseline because they were found upon further review to possess wilderness character.

The two areas added to the planning baseline were not included in the boundary of the White River Inventory Unit in the *1999 Utah Wilderness Inventory* because the map failed to identify lands that were inventoried but found to have no wilderness character. During the inventory, these lands were found to be unnatural due to the impacts of oil and gas and other development, but these lands were not shown on the map.

The first area, located in the northeastern portion of the inventory area, was determined to be unnatural in character during the 1996-1999 wilderness inventory because of a road and a fence line. Public comment on this area initiated a field review in the summer of 2001. The field team examined the road, and it was determined to be a substantially unnoticeable vehicle way. The area north of this vehicle way contains a single insignificant fence line and the area was determined to be natural in character. The field team determined this area, which is approximately 422 acres in size, should be added to the planning baseline.

The second area, located in the north central portion of the inventory area, was dropped during the 1996-1999 wilderness inventory because of the associated sights and sounds from a gas well facility which was being constructed. Public comment regarding this area prompted a field review in the summer of 2001. At this time, the construction of the facility had been completed and noise is no longer considered to be an issue. The field team determined that the area below the gas well facility is natural in character. The boundary now follows the gas pipeline east of the well, and excludes the gas facility. The addition of this area has added approximately 306 acres to the White River planning baseline.

The Elimination of Small Parcels (less than 50 acres) of BLM Lands Due to Human Intrusions

During the inventory, wilderness character boundaries were adjusted to exclude substantially noticeable human impacts. Human impacts such as stock ponds, mining disturbances, recreation sites, and range developments were excluded when found to be contiguous to a boundary road and determined to be a substantially noticeable intrusion impacting natural character.

During the scoping process, additional human intrusions impacting wilderness character were identified that resulted in slight boundary adjustments to the planning baseline in three inventory areas. In two of the cases, these changes are the result of the identification of human intrusions

that existed at the time of initial field inventories, but that were overlooked by field crews or imprecisely documented on field inventory maps.

The following is a list of the boundary adjustments made to the planning baseline to exclude human intrusions that impact wilderness character.

- | | |
|---------------------------------|---|
| <i>Moonshine Draw</i> | Removal of approximately 2.5 acres to exclude two stock ponds along the boundary of the area. |
| <i>Desolation Canyon</i> | Removal of approximately 4 acres to exclude a wildlife guzzler. |
| <i>White River</i> | Removal of 0.75 acre to exclude a drill pad at the end of a route that has been cherry-stemmed from the inventory area. |

Summary of Changes By Inventory Area

All the modifications previously identified as changes to the planning baseline are summarized and located on maps in this section. The planning baseline constitutes the lands with wilderness character that are being considered for possible WSA designation in the Vernal RMP Revision.

Tips On Using the Maps in this Section

The “Baseline Modifications” maps (Maps 2.1 to 2.7) show the original lands found to have wilderness character in the *1999 Utah Wilderness Inventory* and the new planning baseline. Differences between the two sets of data are lettered (i.e. A, B, C...) and described in accompanying narratives.

The following explanation of legend items for these maps is provided to assist in their interpretation and use.

Perimeter boundary of inventory areas mapped in the *1999 Utah Wilderness Inventory* are shown as a strong black line. This boundary encompasses all lands that were inventoried, including those found to have wilderness character and those found not to have wilderness character.

Lands under study (Planning Baseline) are depicted as dark yellow. These areas depict the lands found to possess wilderness character and are the planning baseline for WSA consideration in the Vernal RMP Revision. In some cases the areas found to have wilderness character have been modified from that shown in the *1999 Utah Wilderness Inventory*.

Lands initially found to lack wilderness character are depicted as light yellow (public lands) or white (state lands) with black diagonal stripes. In the *1999 Utah Wilderness Inventory*, these lands were found to lack wilderness character.

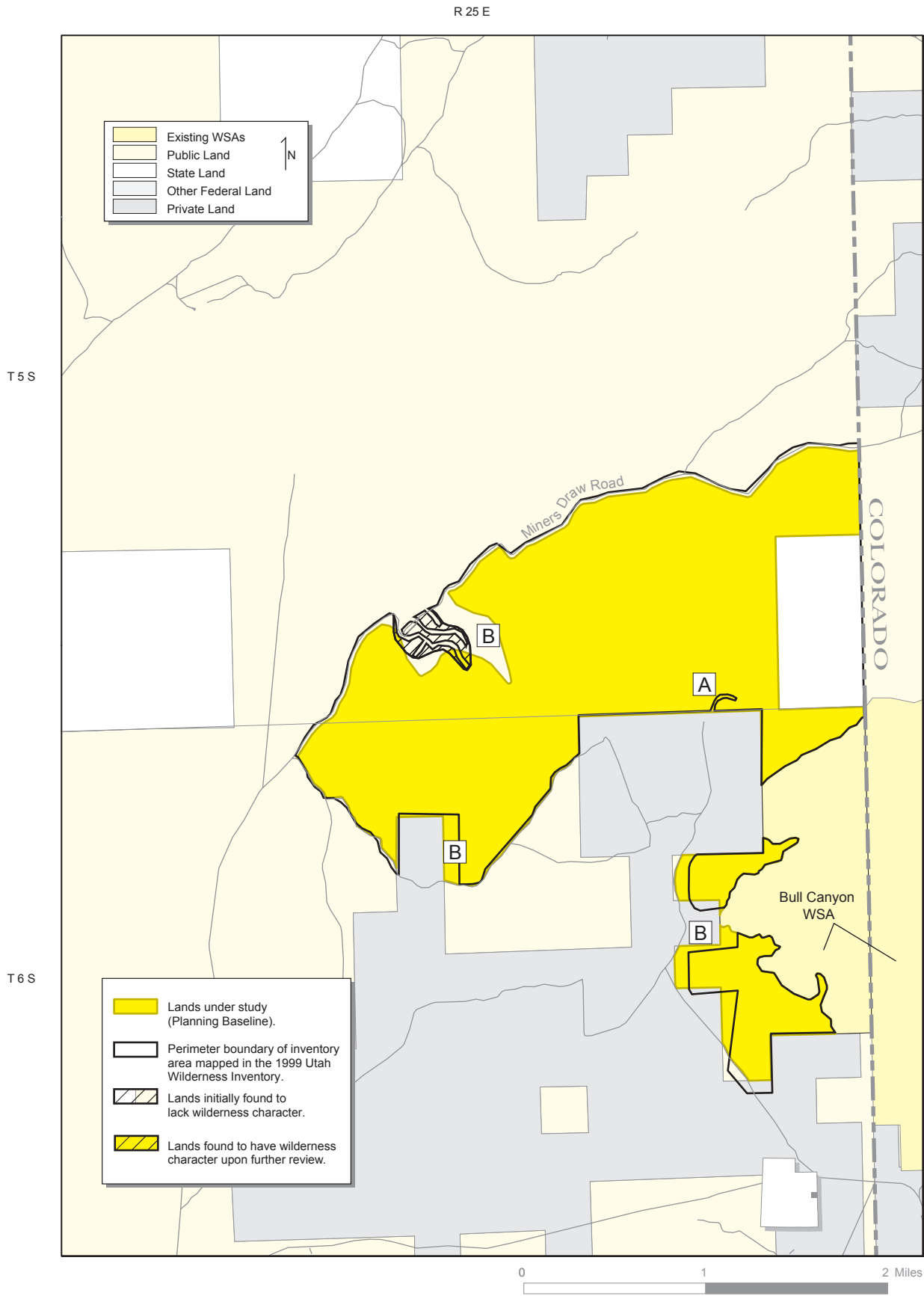
Lands found to have wilderness character upon further review are depicted as dark yellow with diagonal stripes. These lands were initially found to lack wilderness character. However, upon reevaluation, these lands were found to have qualifying wilderness characteristics and are therefore now part of the planning baseline for analysis in the Vernal RMP Revision.

No modifications to the planning baseline were made to the following two inventory areas except for the exclusion of state lands:

Cripple Cowboy
Daniels Canyon

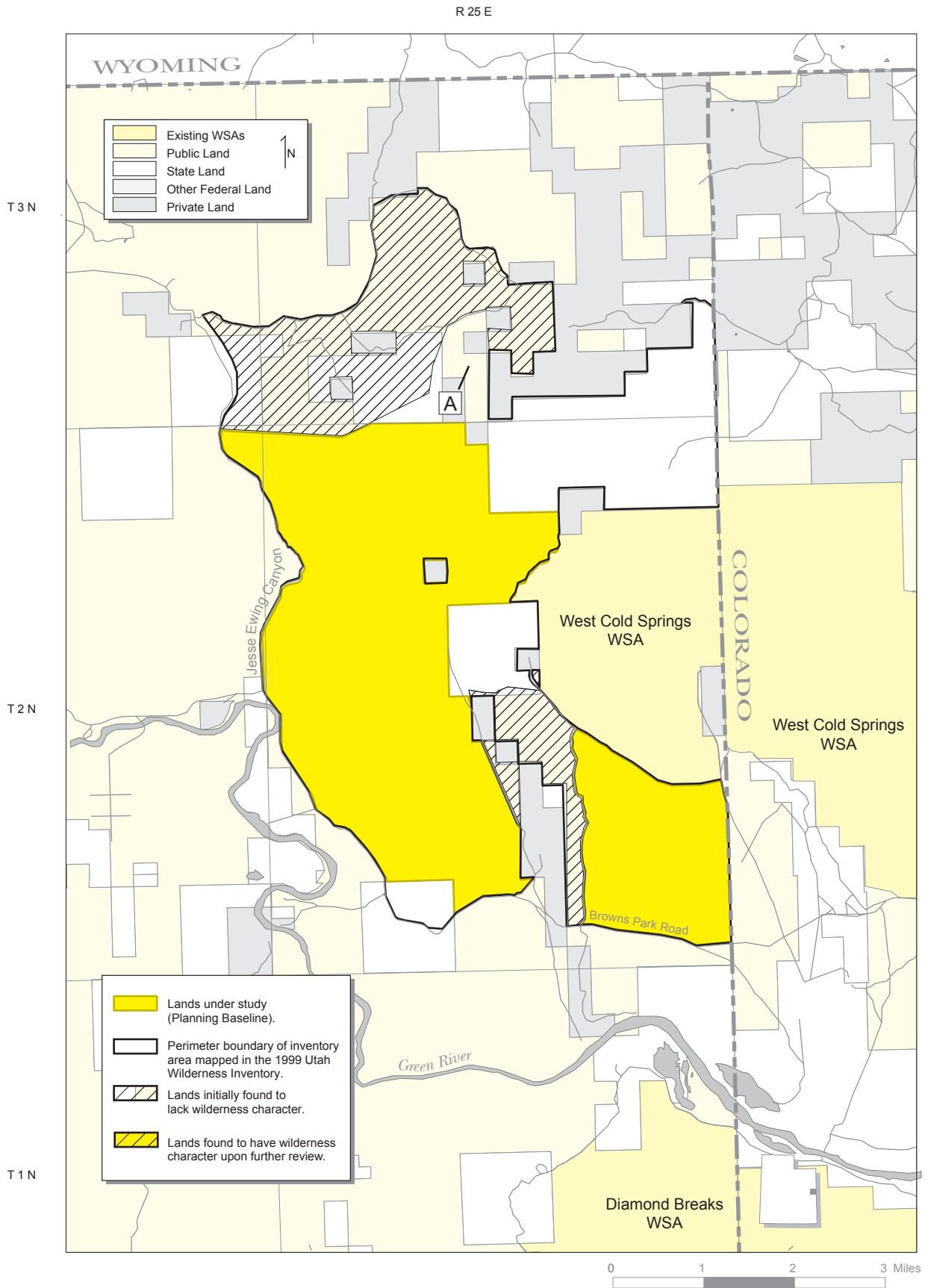
Table 2-1: Summary of Changes by Inventory Area

INVENTORY AREA	BASELINE MODIFICATIONS
Bull Canyon (Refer to Map 2.1)	A This route was reexamined and determined to be a vehicle way that is not a substantially noticeable intrusion on the natural character of the area. The cherry-stem on this way has been removed from the planning baseline.
	B The boundary at this location has been slightly realigned to correct a digitizing error.
Cold Spring Mountain (Refer to Map 2.2)	A This parcel (~ 242 acres) has been severed from the area with wilderness character by state and private lands and lands without wilderness character, and has been removed from the planning baseline.
Desolation Canyon* (Refer to Map 2.3) *This document identifies baseline modifications only for that portion of the inventory area administered by the Vernal Field Office.	A This route was reexamined and found to be a road. The road has been added to the planning baseline separating the western lobe (approximately 14,037 acres) from the rest of the inventory area.
	B This vehicle way was reexamined and is no longer considered to be a substantial impact on the natural character of the inventory area. The cherry-stem has been removed past the wildlife guzzler.
	C This parcel (~ 23,082 acres) has been removed from the planning baseline because these lands have been transferred to the Northern Ute Tribe.
	D A cherry-stem has been added to the planning baseline on a well-established vehicle way that leads to an old drill pad. This vehicle way constitutes a substantially noticeable intrusion that impacts the natural character of the area.
Diamond Breaks (Refer to Map 2.4)	A This parcel (~ 80 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.
	B This fence was reexamined and found to be a substantially unnoticeable intrusion on natural character and the cherry-stem was removed.
Moonshine Draw (Refer to Map 2.5)	A Approximately 1,101 acres have been added to the planning baseline because they were found, upon further review, to be natural in character.
	B This route was reexamined and found to be a vehicle way that is not a substantially noticeable intrusion on the natural character of the area. The cherry-stem on this way has been removed from the planning baseline.
White River (Refer to Map 2.6)	A Approximately 306 acres have been added to the planning baseline because they were found, upon further review, to be natural in character.
	B Approximately 422 acres have been added to the planning baseline because they were found, upon further review, to be natural in character.
	C This parcel (~ 40 acres) has been severed from the inventory area by state and private lands and has been removed from the planning baseline.
	D A cherry-stem has been added to the planning baseline that leads to an unfinished drill pad. This vehicle way and drill pad constitute a substantially noticeable intrusion that impacts natural character.
Wild Mountain (Refer to Map 2.7)	A This parcel (~ 398 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.
	B The boundary at this location has been slightly realigned to correct a digitizing error.



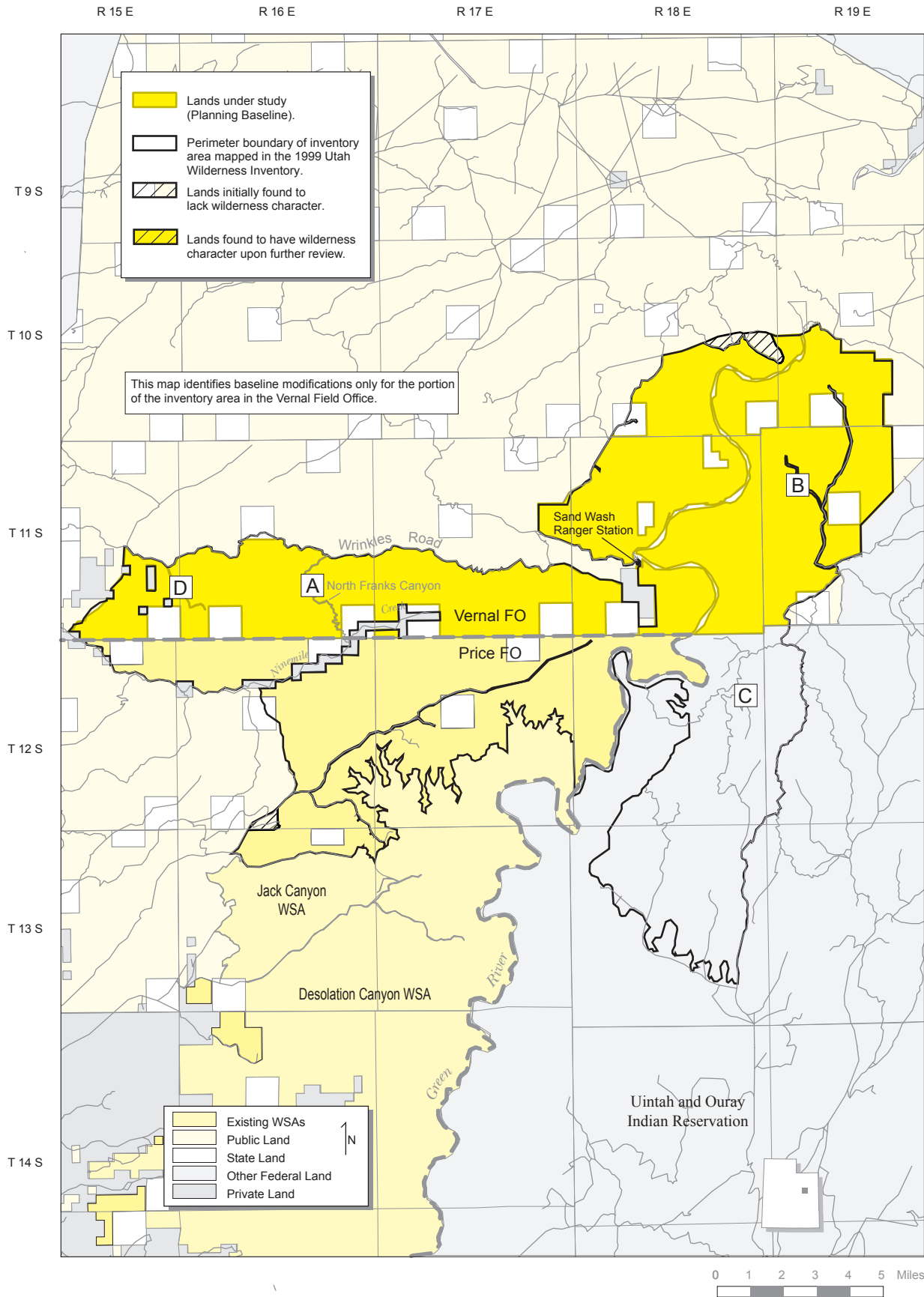
Cold Spring Mountain

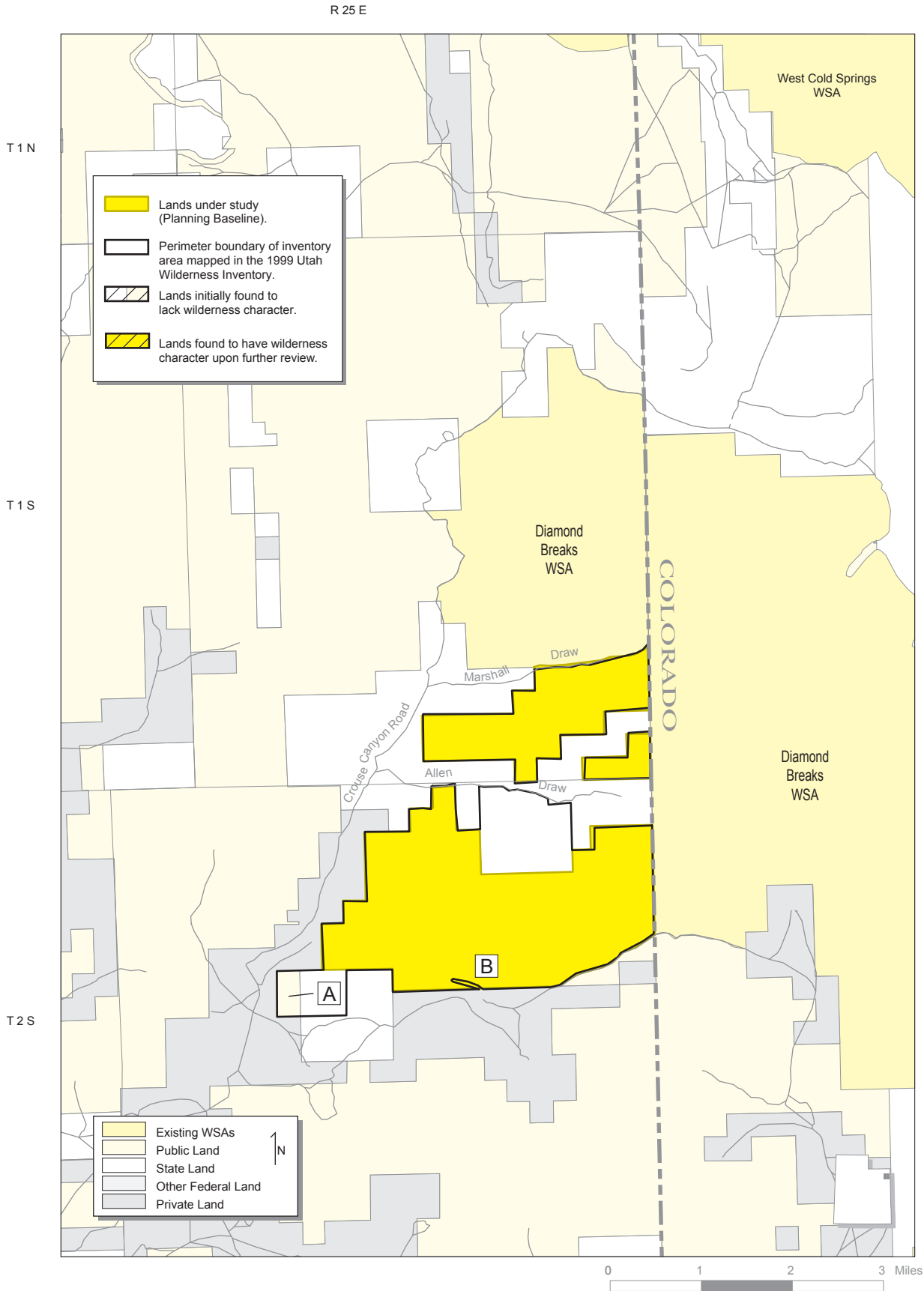
Baseline Modifications

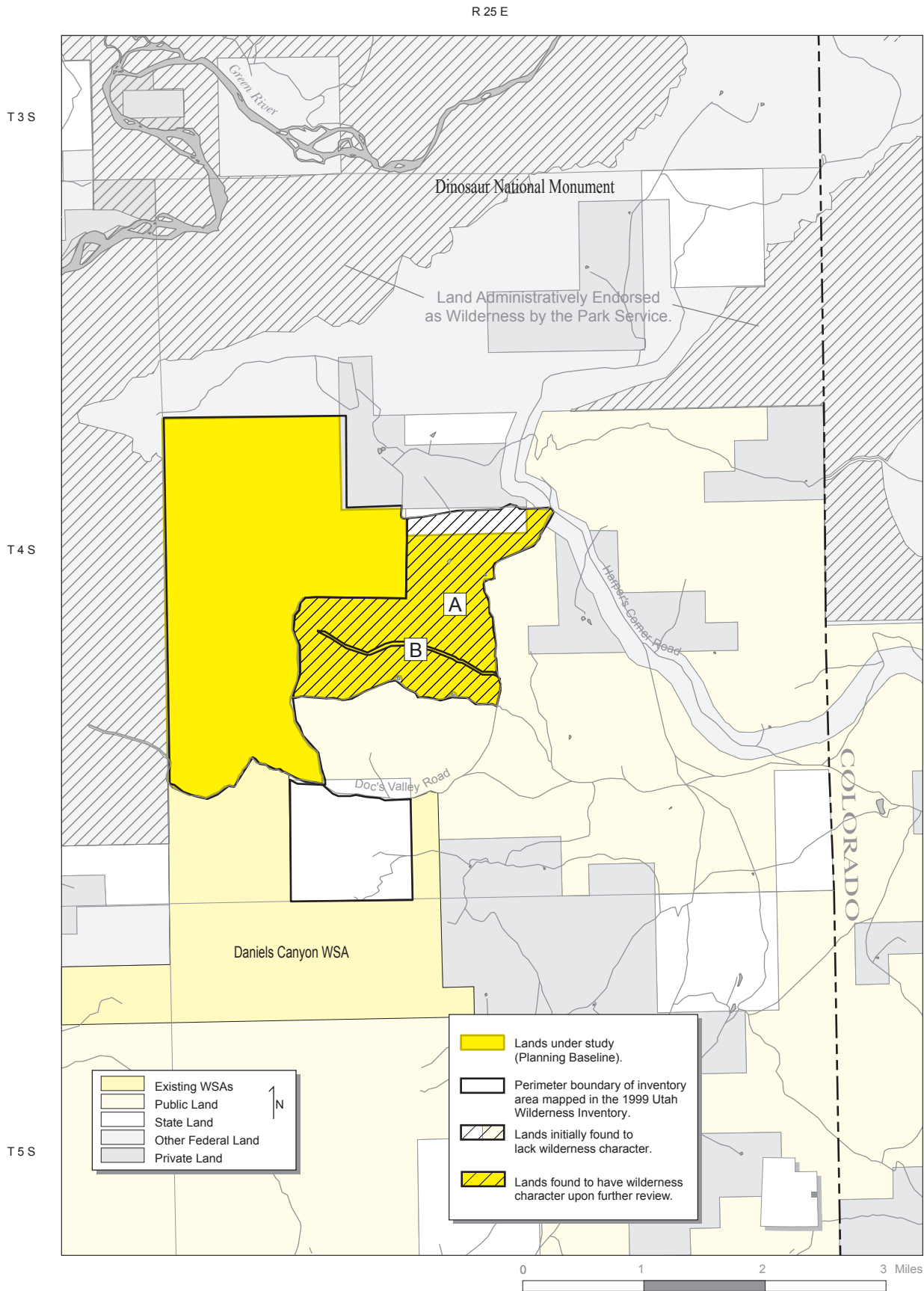


Desolation Canyon

Baseline Modifications

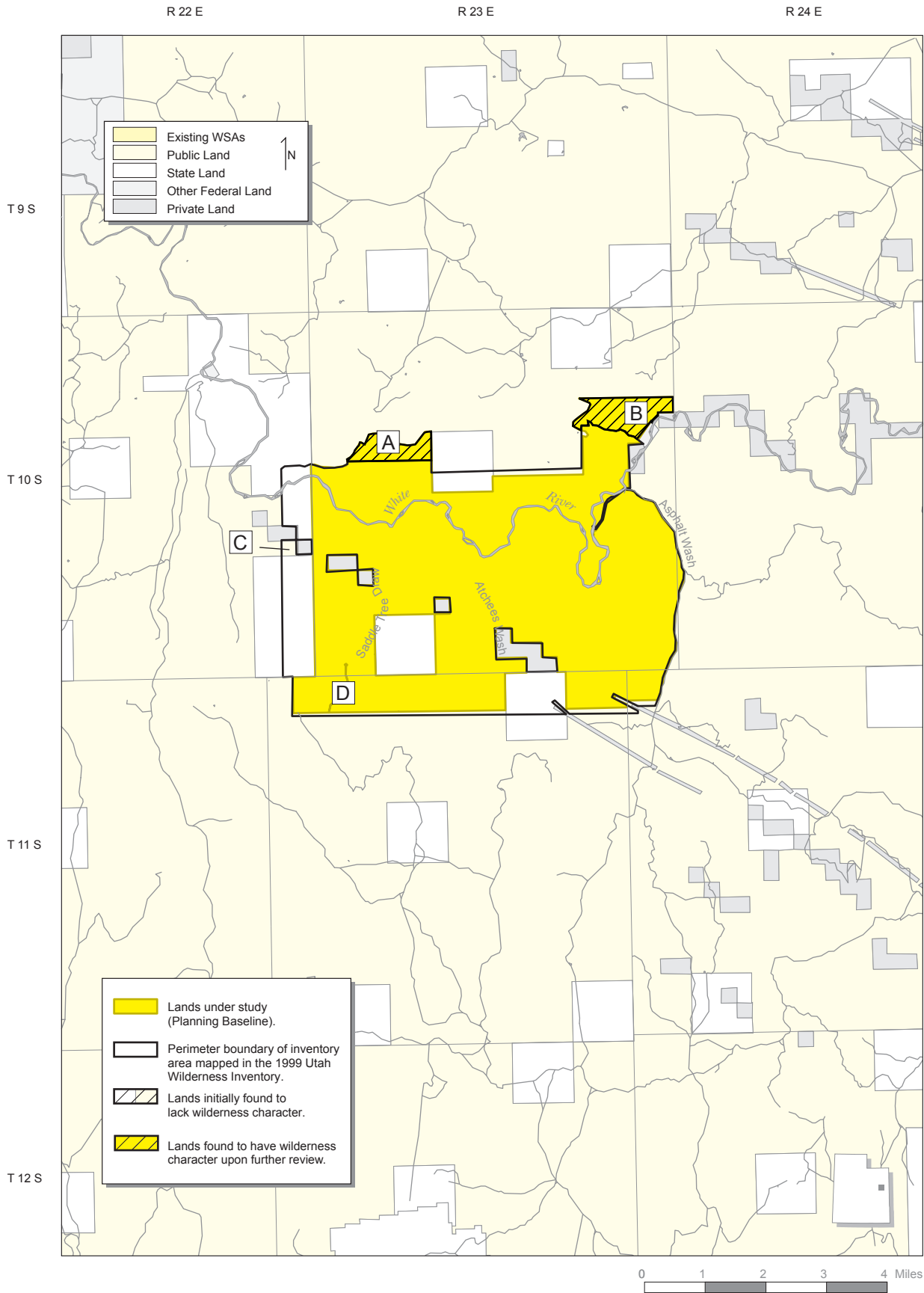


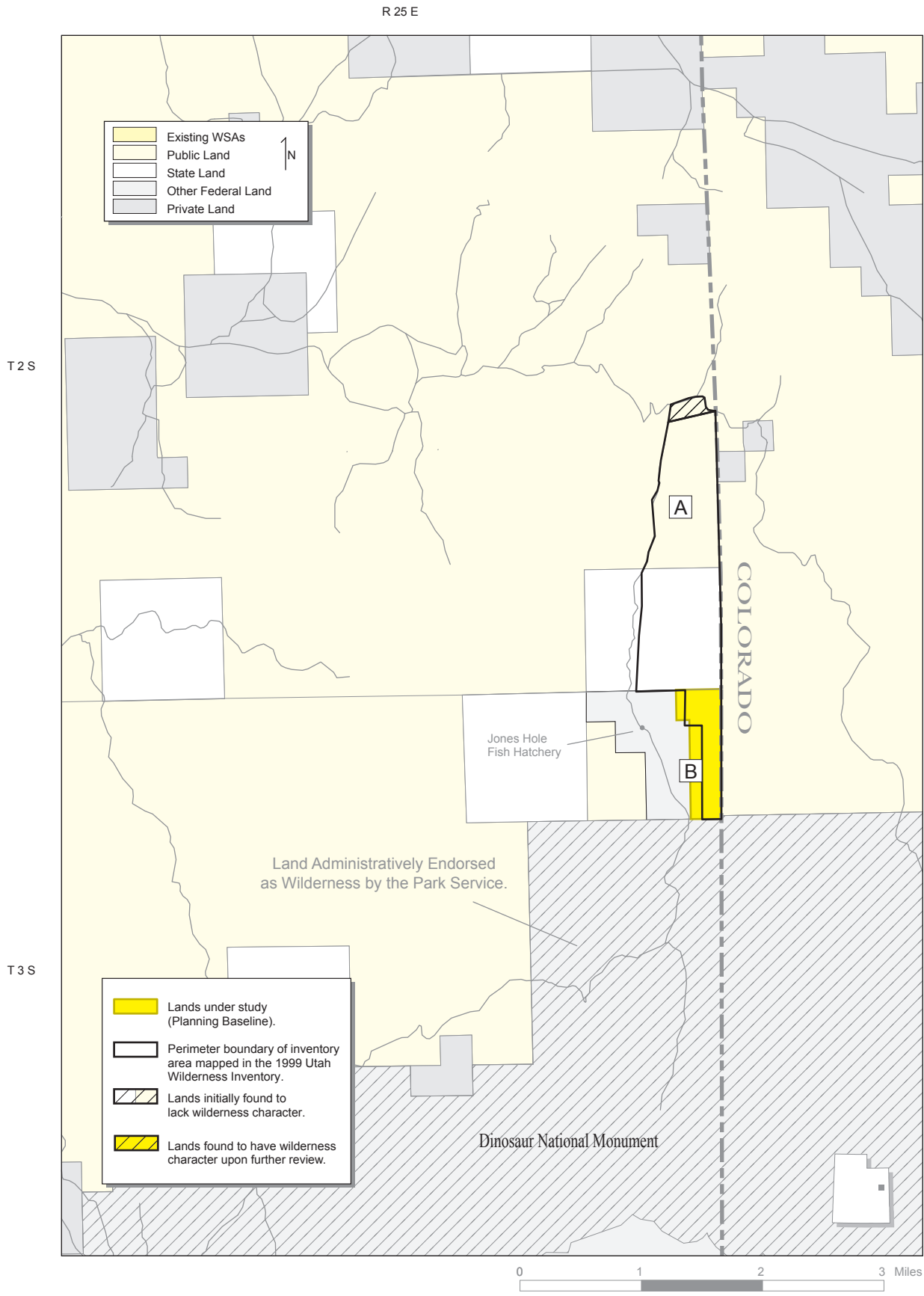




White River

Baseline Modifications





Explanation of Acreage Summary Table in this Section

Table 2-2: Acreage Summary compares the total wilderness character acres in the *1999 Utah Wilderness Inventory* with the new planning baseline for the Vernal RMP Revision. The planning baseline acres reflect modifications due to mapping improvements and corrections, the exclusion of state lands, changes in vehicle route cherry-stems, and changes in wilderness character findings. Changes in acres due to the four factors above do not always add up to the total difference in acres because of other reasons. One such reason is that the planning baseline acres are accurately calculated and not rounded, while the *1999 Utah Wilderness Inventory* acres were rounded to the nearest 100.

Table 2-2: Acreage Summary

Inventory Areas	Wilderness Character Acres Identified in the 1999 Utah Wilderness Inventory	Wilderness Character Acres Forming the Planning Baseline for the Vernal RMP Revision
Bull Canyon	2,470	2,410
Cold Spring Mountain	9,500	9,192
Cripple Cowboy*	13,700	13,592
Daniels Canyon	3,100	3,045
Desolation Canyon**	81,425	57,726
Diamond Breaks	4,500	4,468
Moonshine Draw	2,700	3,837
White River	13,500	13,693
Wild Mountain	500	194
Total	131,395	108,157

* Includes 1,028 acres in Grand County/Moab Field Office

** Acreage figures apply only to the lands administered by the Vernal Field Office

Section III Inventory-Related Scoping Comments and BLM Responses

The majority of comments received during the initial public scoping for the statewide WSA planning project related to wilderness inventory findings. Many of those comments were general in nature, addressing questions related to policy, regulation, and procedures used by the BLM to conduct wilderness inventory. The first part of this section of the document contains a series of question and answers designed to address many of the relevant issues, concerns, and questions that were raised during the initial scoping process.

Other comments submitted during scoping were quite detailed and specific to a particular place or vehicle route. These comments primarily focused on whether a particular location did or did not have wilderness character, or if a specific route should or should not be considered a “road.” These comments are addressed on an inventory area by inventory area basis in the second part of Section III.

Responses to General Issues, Concerns, and Questions Related to the 1999 Utah Wilderness Inventory

What was the legal authority for conducting the reinventory outside of the Federal Land Policy and Management Act (FLPMA) Section 603 process?

The FLPMA of 1976 provides the basic public land policy and guidelines for the management, protection, development, and enhancement of public lands. Section 603 of FLPMA governed the original BLM wilderness review, which was completed for Utah in 1990.

Authority for additional wilderness inventory and planning is provided by FLPMA in Sections 102 (a) (2) and (8), 201 (a), and 202(c) (4) and (9) and land-use planning in Sections 202 (a), (b), (c), and 205 (b). Among other things, these sections direct BLM to "preserve and protect certain public lands in their natural condition." The section of the Act that specifically provides the authority to conduct resource inventories is Section 201 which says: “The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern. This inventory shall be kept current so as to reflect changes in conditions and to identify new and emerging resource and other values.”

The Tenth Circuit United States Court of Appeals rejected a legal challenge to the Secretary’s authority to conduct the Utah inventory.

How was the inventory completed?

Specific steps taken to conduct the inventory included the following:

- The boundaries of the areas proposed for wilderness designation in legislation before Congress in 1996 (H.R. 1500 and H.R. 1745), including the existing BLM

- WSA boundaries, were transposed onto recent low level aerial photographs.
- Trained aerial photography interpreters reviewed each photograph and marked them to identify potential human disturbances.
- Potential surface-disturbance information was transferred from the aerial photographs to 7.5 minute orthophoto and topographic maps.
- The aerial photographs and maps generated in the first three steps were provided to the inventory teams.
- Available information, such as county wilderness proposals and previous wilderness inventory findings, was reviewed by team members.
- Each inventory area was visited. Field checks were made using helicopter flights, driving boundary roads and vehicle ways within the areas, as well as hiking and mountain biking to remote locations. Surface disturbances were examined and documented. The inventory team was equipped with global positioning system (GPS) units, which use satellite technology to determine locations on the ground. The GPS equipment, in concert with current maps and aerial photographs, aided the team in documenting the location of surface disturbances, roads and ways, and photo points.
- Roads or vehicle ways identified in the field were documented on field maps, described on road/way analysis forms, and photographed. This documentation was placed in permanent documentation files for each inventory area.
- Other surface disturbances, such as mining impacts and range and wildlife developments, were also documented on field maps and photographed. This documentation was also placed in each permanent documentation file.
- Each permanent documentation file was reviewed by the field team, the team leader, and in some cases the project leader, and a preliminary finding of the presence and/or absence of wilderness characteristics was made.
- A wilderness inventory evaluation was written for each inventory area and included in each permanent documentation file. The project leader signed them after concurrence with the findings regarding whether or not each area, or portions thereof, had wilderness character.

How was the inventory documented?

The inventory produced two products: the *1999 Utah Wilderness Inventory*, which was a report to the Secretary, and a permanent documentation file for each inventory area. The report to the Secretary summarizes the overall results of the wilderness inventory by inventory area, and includes:

- *Inventory Area Acres.* Acreage totals for the area inventoried, acreage found to possess wilderness characteristics, and acreage found to lack wilderness characteristics are provided.
- *Area Description.* A summary of the inventory area, including its general location, major features, general topography and vegetation, and current and past uses is provided.

- *Wilderness Characteristics.* A general summary of the wilderness values defined by the *Wilderness Act of 1964* (size, naturalness, outstanding opportunities for solitude or primitive and unconfined recreation, and supplemental values) is provided.
- *Inventory Area Map.* A map of each inventory area depicting lands with or without wilderness characteristics is provided. Contiguous existing WSAs are also shown. Maps in this revision document do not provide the detail or accuracy that are provided on the 7.5 minute topographic maps in each permanent documentation file.

The permanent documentation file for each inventory area contains the detailed information gathered in the inventory, including a wilderness inventory evaluation, road/way analysis forms, various topographic maps, photographs and photo logs, aerial photographs, and miscellaneous information.

Were valid existing rights, such as mineral leases and rights of way, taken into consideration during the inventory process?

The BLM's wilderness inventory policy directs teams to use rights-of-way (ROWs) as boundaries of inventory areas. Other valid existing rights, however, such as mineral leases, are considered in the planning process used to determine which areas should become WSAs.

How did developed Rights-of-Way affect the inventory?

Bureau policy directs inventory teams to use rights-of-way (ROWs) as boundaries of wilderness inventory areas. It doesn't matter whether the facilities authorized by the ROW are above ground like power lines or underground like buried pipelines and the surface has been reclaimed. ROWs are excluded from wilderness inventory areas.

Were Revised Statute 2477 (RS 2477) claims taken into consideration during the inventory process?

No. The policy and legal debate on the road right-of-way issue centers around interpretation of RS 2477. That law was repealed by FLPMA in 1976, but its effects are now a matter before the US Courts. Resolution of this debate is a national and statewide issue beyond the scope of the wilderness inventory.

How were the boundaries of the inventoried lands determined?

The inventory team used legislation before Congress in 1996 (H.R. 1500 and H.R. 1745) to identify the areas for examination. They generally followed the boundaries defined in those bills, but departed from them in certain instances as a result of conditions observed on the ground. As a result, this inventory involved some lands that were not included in H.R. 1500 or H.R. 1745.

Will the Vernal Field Office RMP Revision consider additional lands identified by the Utah Wilderness Coalition as having wilderness character if those lands have not been reinventoried by BLM?

The planning baseline for new WSA consideration in the Vernal RMP Revision will begin with those lands that BLM has inventoried and found to have wilderness character in the *1999 Utah Wilderness Inventory*. If the public provides new information (as per BLM Handbook H-6310-1; map, narrative, and photos) on the wilderness character of other areas that is significantly different than previous BLM inventories, and the BLM determines there is a reasonable probability they may have wilderness character, those areas, too, would be considered for WSA designation in the Vernal RMP Revision process.

Can the areas found not to have wilderness character, as well as other lands that were not inventoried during this process, still be considered for designation as WSAs in future land-use planning?

Yes. Section 201 of FLPMA requires that inventories be updated on a continuing basis. Such inventories could be for a myriad of resource values, including wilderness resources, and may be considered in land-use plans or amendments in the future.

Why did the BLM primarily rely on roads or other human disturbances rather than using cliff lines, canyon rims or other natural topographic features as boundaries for inventory areas?

BLM's focus for the inventory was on areas identified in 1996 by HR 1500 and HR 1745. As the inventory proceeded on the ground, and as determinations were made concerning the existence or absence of wilderness character, boundaries were refined. Boundaries were drawn along roads, edges of disturbance, topographic features, property lines, and others. Alternative boundaries will be considered as part of the Vernal RMP Revision as a means to protect wilderness resources and resolve conflicts with other land uses.

What criteria were used to determine if lands have wilderness values?

The inventory team evaluated wilderness characteristics as discussed in Section 2 (c) of the *Wilderness Act of 1964*, which the Congress incorporated in the FLPMA, which states:

“A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an

unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.”

What is the definition of a road used in BLM’s wilderness inventory process?

In order to insure a consistent identification of "roads" as opposed to an unmaintained vehicle way, the following definition was used:

"The word 'roadless' refers to the absence of roads which have 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."

This language is from the House Committee Report 94-1163, page 17, dated May 15, 1976, which forms part of the legislative history of the FLPMA. To improve application of this definition, *The Utah Wilderness Inventory Procedures* further defined certain words and phrases in the road definition:

- "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.
- "Mechanical means" - Use of hand or power machinery or tools.
- "Relatively regular and continuous use" - Vehicular use which 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.

A route maintained solely by the passage of vehicles is not a road, even if it is used on a relatively regular and continuous basis. Vehicle routes constructed by mechanical means but which are no longer being maintained by mechanical methods are not roads. Sole use of hands and feet to move rocks or dirt without the use of tools or machinery does not meet the definition of "mechanical means." Roads need not be "maintained" on a regular basis but rather "maintained" when road conditions warrant actions to keep it in a usable condition. A dead-end (cherry-stem) road can form the boundary of a inventory area, and does not by itself disqualify an area from being considered "roadless.”

This definition is identical to the road definition used in all BLM wilderness inventories.

How does the BLM apply the wilderness criteria for size?

The inventory team determined if the inventory area ". . . has at least 5,000 acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition." Specifically, the size criteria was satisfied in the following situations:

- Roadless areas with over 5,000 acres of contiguous public lands. State or private lands are not included in making this acreage determination.

- Any roadless island of the public lands of less than 5,000 acres.
- Roadless areas of less than 5,000 acres of contiguous public lands where any one of the following apply:
 - They are contiguous with lands which have been formally determined to have wilderness or potential wilderness values, or
 - It is demonstrated that the area is clearly and obviously of sufficient size as to make practicable its preservation and use in an unimpaired condition, and of a size suitable for wilderness management, or
 - They are contiguous with an area of less than 5,000 acres of other federal lands administered by an agency with authority to study and preserve wilderness lands, and the combined total is 5,000 acres or more.

How does the BLM apply the wilderness criteria for naturalness?

The inventory team determined if the area ". . . generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable." Findings regarding naturalness were based on the appearance of the area as seen from the ground, by the average visitor. An inventory area did not have to be free of human development to be considered natural. It could have some evidence of people.

How does the BLM apply the wilderness criteria for outstanding opportunities for solitude or primitive and unconfined recreation?

The inventory team determined if the area ". . . has outstanding opportunities for solitude or a primitive and unconfined type of recreation" The word "or" in this sentence means that an area has to possess only one or the other. An area does not have to possess outstanding opportunities for both elements, and does not need to have outstanding opportunities on every acre. However, there must be outstanding opportunities somewhere in the area. When inventory areas were contiguous to existing WSAs or other agency lands with identified wilderness values, they were considered an extension of these lands. The inventory considered the interrelationship of the adjacent wilderness character lands with the inventory areas in determining opportunities for solitude or a primitive and unconfined type of recreation.

How does BLM apply the wilderness criteria for supplemental values?

The *Wilderness Act* states that a wilderness "may also contain" supplemental values and identifies them as ". . . ecological, geological, or other features of scientific, educational, scenic, or historical value." Supplemental values are not required for WSAs, but the inventory documented where they exist. The lack of supplemental values did not affect the determination of the existence of wilderness character.

How are sights and sounds outside of inventory areas assessed?

Human impacts outside inventory areas were not normally considered in assessing wilderness characteristics. However, if an outside impact of major significance exists, it was noted in the inventory and evaluated for its effects on the inventory area. Human impacts outside an inventory area did not automatically lead to a conclusion that an inventory area lacked wilderness characteristics. Congressional guidance on this issue in House and Senate Reports on the *Endangered American Wilderness Act of 1978* has cautioned federal agencies in the consideration of outside sights and sounds in wilderness studies. For example, in the case of the Sandia Mountain Wilderness in New Mexico, the House Report (No. 95-540) stated “the ‘sights and sounds’ of nearby Albuquerque, formally considered a bar to wilderness designation by the Forest Service, should, on the contrary, heighten the public’s awareness and appreciation of the area’s outstanding wilderness values.”

Will BLM consider new information concerning the inventory areas under study in the Vernal Field Office?

Yes. New information provided through initial public scoping has helped BLM refine the wilderness character planning baseline. That information, as well as new scoping information, will aid in the development of alternatives for the draft RMP/EIS. During future public comment periods, BLM will continue to request and consider new information regarding the adequacy and accuracy of the draft RMP/EIS.

Did the inventory designate WSAs?

No. The inventory determined whether certain lands have or do not have wilderness characteristics. It did not alter existing land-use plans or create, enlarge, or diminish existing WSAs. Future designation of new WSAs can only be done through BLM’s planning process as provided for in FLPMA Section 202.

Are the results of wilderness inventory the same as a BLM recommendation to Congress as to what lands should be designated as wilderness?

No. The inventory is simply a finding regarding areas which have or do not have wilderness characteristics. It is not BLM’s recommendation to Congress regarding which areas should be designated as wilderness.

Has there been a parallel inventory of other resource values and uses along with the wilderness review?

The BLM and other federal and state agencies have been inventorying and gathering information on a myriad of resource values and uses for decades. This extensive base of resource and planning information is being used to prepare the Vernal RMP Revision. In addition, BLM is using new information on the inventory areas received during public scoping.

Why did BLM consider some routes to be vehicle ways and some routes to be roads when they are similar in appearance?

BLM's road definition requires that three distinct elements be met: 1) mechanical construction, 2) mechanical maintenance, and 3) regular and continuous use. Inventory teams used slides, narratives, and internal road/way analysis forms and notations on inventory maps to document their observations of the three elements. Of the three elements, evidence of mechanical maintenance was often the most difficult to ascertain. Sometimes, the inventory teams found clear evidence of all three elements, resulting in a road determination. Other times, although a route looked similar to one identified as a road, one or more of the three elements could not be confirmed, and the route had to be identified as a way. However, in the planning baseline, some of these vehicle ways have been cherry-stemmed because they were determined to be substantially noticeable intrusions on naturalness.

Why did BLM determine several vehicle routes were roads when evidence of mechanical maintenance was not substantiated?

Public scoping comments identified situations where BLM's road definition involving mechanical maintenance was not consistently applied. Subsequent review of these inconsistencies resulted in several routes which originally were determined to be roads to be redefined as vehicle ways because there was no evidence of mechanical maintenance.

The BLM cherry-stemmed vehicle ways; isn't that inconsistent with inventory procedures?

No. Vehicle ways were only cherry-stemmed when they were determined to be substantially noticeable intrusions on naturalness. This is consistent with inventory guidelines to exclude significant impacts that influence an area's naturalness.

Doesn't the practice of cherry-stemming simply avoid the issue of a lack of wilderness character?

No. BLM guidance for wilderness inventories has always allowed for selective cherry-stemming to exclude roads and other substantially noticeable intrusions on naturalness. Inventory teams use professional judgement on a case-by-case basis to decide when cherry-stemming is appropriate. During the wilderness reinventory, the wilderness team determined that entire areas lacked wilderness character where multiple routes and other impacts cumulatively affected the wilderness character of the area as a whole. In other situations, the inventory team determined that routes and impacts could be selectively cherry-stemmed without cumulatively impacting the wilderness character as a whole.

Why were the teams conducting the inventories inconsistent in their application and findings?

Numerous people inventoried large number of acres with varying types of terrain throughout the state. Determination of whether or not an area has wilderness characteristics is subjective. BLM attempted to mitigate that subjectivity by using professional, experienced personnel, and by applying a set criteria and methodology. Still, providing totally consistent findings is difficult.

How are inventory inconsistencies taken into consideration during the planning process?

BLM specialists thoroughly documented inventory findings. These findings were made available for public review as part of the planning process. As a result of comments received during public scoping, additional field work resulted in some changes to the

planning baseline in the Vernal Field Office. Other adjustments, if warranted, will continue to be considered as comments are received throughout this planning process.

Why were many routes not inventoried, but nevertheless used as boundaries of inventory areas?

The boundaries of the areas inventoried were largely defined by two 1996 legislative proposals: H.R.1500 and H.R. 1745. Routes forming these legislative boundaries were not part of the inventory areas, and therefore, road/way analysis forms were not always prepared for them. Still, the inventory teams were aware of these boundary routes, and generally identified them as roads (this was obvious when highways or graveled roads were involved) or vehicle ways on topographic maps in the permanent documentation file. These maps document the findings of the inventory, and are the primary source of the findings regarding boundary routes.

Responses (Inventory Review Results) to Specific Comments By Inventory Area

The tables that follow provide a synopsis of site-specific comments and responses for each of the nine inventory areas found to have wilderness characteristics in the Vernal Field Office. Many of the comments received during scoping were detailed and specific to a particular place or vehicle route. These comments primarily focused on whether or not a particular location did or did not have wilderness character, or if a specific route should be considered a “road” or a “vehicle way.” A Response to Comments Map is provided for each inventory area (Maps 3.1 to 3.9). Comment numbers are linked to points on the maps to depict the general location of the areas of concern.

An electronic version of this document is posted on the Internet. The maps at the Internet site can be enlarged to provide greater detail. This site can be accessed at www.ut.blm.gov/wilderness.

BULL CANYON (Refer to Map 3.1)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
1	BLM incorrectly excludes a natural area, the routes found within the area are not maintained and are not significant impacts. BLM fails to use a significant impact as the boundary.	The boundary follows the edge of disturbance separating the inventory area from lands lacking wilderness character due to cumulative impacts from numerous vehicle ways and a material pit.	No
2	The BLM incorrectly cherry-stems Road 3, which is not a significant impact. The route is not frequently used and is not mechanically maintained, no road/way form was completed.	Upon further review and reconsideration, the BLM found Road 3 to be a vehicle way that does not constitute a substantially noticeable intrusion on the natural character of the area. The cherry-stem along this way has been removed. A road/way form is included in the file.	Yes (See “A” on Map 2.1 in Section II)
3	The BLM missed two vehicle routes along the northern boundary of the inventory area.	These routes were inventoried, one of which was determined to be a 100 yard track which provides access to a fence line. The other route, identified as BC-1, was determined to be a vehicle way which does not receive maintenance or regular and continuous use.	No

COLD SPRING MOUNTAIN (Refer to Map 3.2)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
1	BLM incorrectly classifies Way #2 as a road and cherry-stems it. BLM’s road/way form confirms the route receives no mechanical maintenance.	This route is entirely on state lands, and is not part of the planning baseline.	No
2	BLM fails to use a significant impact as the boundary, excluding an area free of any significant impacts.	The boundary follows the edge of disturbance separating the inventory area from lands lacking wilderness character, due to cumulative impact of numerous access routes to major natural gas pipelines and a fiber optic line right-of-way, a concentration of vehicle ways, and a major range pipeline.	No

CRIPPLE COWBOY (Refer to Map 3.3)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
1	The boundary in this area uses an arbitrary line along a ridge top and over a cliff face. The boundary should be expanded to the north.	The boundary follows a vehicle way and ridge line that separates the inventory area from lands lacking wilderness character due to the cumulative impact of a woodcutting area and gas wells.	No
2	The boundary in this area is an impassable route with no mechanical maintenance. The boundary should be expanded to include the area to the east.	The boundary follows Bitter Creek Road and ownership lines. Bitter Creek Road was determined to be a road because it meets all of the criteria of the BLM road definition used for wilderness inventory purposes.	No
3	The BLM incorrectly cherry-stems a route that is not mechanically maintained and is a revegetating way. The historic homestead at the end of the route should be considered a supplemental value, not a disqualifying impact. Another comment stated that the route up Chipeta Canyon is a road.	The route up Chipeta Canyon was determined to be a road up to the cabin because it meets all of the criteria of the BLM road definition used for wilderness inventory purposes. While the cabin may be old, it serves as a BLM administrative facility. The route past the cabin was determined to be a vehicle way and was not cherry-stemmed.	No
4	A stock pond is located 1/4 mile from the western boundary road. The stock pond and route leading to it should be cherry-stemmed.	This route, identified as Route "B", was determined to be a vehicle way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. There is a temporary above-ground stock water tank located approximately 0.2 mile along the route. The route and the tank were not found to be a significant intrusion and were not cherry-stemmed.	No
5	The road on Johns Ridge will have to stay open in order for the grazing permit holder to maintain the two guzzlers there.	This route was determined to be a vehicle way because it is not maintained. BLM policy provides for maintenance of existing livestock developments.	No
6	BLM incorrectly classified Route D as a way, it should be determined to be a road.	Route D was determined to be a vehicle way because it was not constructed, not maintained, and does not receive regular and continuous use.	No
7	The route down Taylor Canyon should be recognized as a road.	This route was determined to be a vehicle way because it is not maintained and does not receive regular and continuous use.	No
8	The inventory area includes the Indian allotment in sections 18 and 30, T14S, R25E.	The boundary of the inventory area excludes all Native American lands.	No

DANIELS CANYON (Refer to Map 3.4)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
1	BLM fails to inventory past an arbitrary section line. The boundary should be expanded to include the area to the north which is free of any significant impacts.	Lands to the north are administered by the State of Utah and the National Park Service as part of Dinosaur National Monument.	No
2	In Unit #1 there is a bulldozer road that bisects the entire length from east to west. On the top eastern portion there is about 3/4 mile of brush fence. A road, coming from private land on the east, crosses the unit to access the fence for annual maintenance. There are two stock watering ponds on the north side in Doc's Valley that periodically need bulldozer maintenance.	The intrusions in Unit #1 are entirely on state land, and are not part of the planning baseline. Stock ponds north of the boundary in Doc's Valley are located in the Moonshine Draw inventory area and are taken out of the planning baseline.	No
3	Unit #2 has over a mile of net wire fence within the south portion that has to be maintained annually or biannually.	Fences in the inventory area will be allowed to be maintained.	No
4	There is a very active building stone quarry associated with the cherry-stem on the east end of the inventory area.	This quarry was cherry-stemmed along with a route and is not part of the planning baseline.	No
5	There is a road that enters into the south portion of Unit #2 on the top part of the mountain that is used extensively for livestock and hunting purposes.	This route, identified as Route #7, was determined to be a vehicle way because it is not constructed, not maintained, and does not receive regular and continuous use. Livestock grazing and hunting are permitted in the inventory area.	No
6	The BLM missed a route which bisects the inventory area from the South Fork Cub Creek Road to the eastern boundary.	This area was examined and no vehicle route was found in the location indicated.	No

DESOLATION CANYON* (Refer to Map 3.5)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
1	BLM fails to inventory a roadless area. BLM uses arbitrary section lines and a faint way (Way #8) as the boundary. The boundary should be expanded to the north and west to include a natural area.	The areas to the north and west are outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	No

DESOLATION CANYON* (Refer to Map 3.5)

#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
2	<p>BLM has incorrectly cherry-stemmed Way #17, which is not mechanically maintained. BLM fieldwork for the route is only past the cherry-stem portion. The route is not a significant impact and should not be cherry-stemmed past the guzzler.</p> <p>There is one wildlife guzzler in good condition which is accessed by the oil field road located near the SE1/4 NE1/4, Section 17, T11S, R19E, SLB&M.</p>	<p>Upon further review and reconsideration the BLM found that Way #17 was not a significant impact past the wildlife guzzler and the cherry-stem was removed along this portion of the way.</p>	<p>Yes (See "B" on Map 2.3 in Section II)</p>
3	<p>Lands currently administered by the U.S. Department of Energy as Naval Petroleum and Oil Shale Reserves #2 in Townships 13S and 12S and Ranges 18E and 19E have been included in your wilderness inventory.</p>	<p>These lands have been transferred to the Northern Ute Tribe and are not part of the planning baseline.</p>	<p>Yes (See "C" on Map 2.3 in Section II)</p>
4	<p>Unit #1 contains several county roads constructed on R.S. 2477 rights-of-way which were not identified in the inventory.</p>	<p>All of these routes were inventoried and identified as vehicle ways because they do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. One of the vehicle ways, identified as Route #20, was identified as a significant intrusion and was cherry-stemmed from the planning baseline.</p> <p>See response on Page 25 regarding questions about R.S. 2477.</p>	<p>No</p>
5	<p>A portion of Section 19, T10S, R19E on the west side of the Green River does not have wilderness characteristics. Way #5 and a route that branches from it are substantially noticeable and detract from the naturalness of the area.</p>	<p>The routes in the Way #5 Complex are not constructed and do not receive maintenance or regular and continuous use. These routes are overgrown with tamarisk and were determined not to be significant impacts on naturalness.</p>	<p>No</p>
6	<p>Way #13 leads to a drill hole and should be recognized as a road.</p>	<p>Way #13 was determined to be a way because it does not receive maintenance or regular and continuous use. While this vehicle way does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes, it was cherry-stemmed because it constitutes a substantially noticeable intrusion that impacts the natural character of the area.</p>	<p>Yes (See "D" on Map 2.3 in Section II)</p>
7	<p>Way #12 leads to a drill hole and should be recognized as a road.</p>	<p>Way #12 was determined to be a way because it does not receive maintenance or regular and continuous use. The drill pad at the end of the route is revegetating.</p>	<p>No</p>
8	<p>Way #3 should be recognized as a road.</p>	<p>Upon further review and reconsideration the BLM found Way #3 to be a road because it meets all of the criteria of the BLM road definition used for wilderness inventory purposes. The road was constructed, is maintained on an annual basis, and receives regular and continuous use.</p>	<p>Yes (See "A" on Map 2.3 in Section II)</p>

DESOLATION CANYON* (Refer to Map 3.5)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
9	There is one unimproved road which crosses the inventory area near the intersection of 110 degrees 93 ½ minutes longitude and 39 degrees 43 minutes 93 seconds latitude. It crosses 9 miles, ending near the intersection of 110 degrees 93 minutes longitude and 39 degrees 43 minutes 99 seconds latitude. This road is the only access to a portion of the Uintah and Ouray Indian Reservation.	This route is located on lands transferred to the Northern Ute Tribe. These lands are not part of the planning baseline.	No

*This document identifies public comments only for that portion of the inventory area administered by the Vernal Field Office.

DIAMOND BREAKS (Refer to Map 3.6)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
1	BLM has not inventoried a natural area west of the Diamond Breaks WSA. The boundary should be expanded to include this area.	This area is entirely state land and is not part of the planning baseline.	No
2	The boundary route in this location is not used frequently and is not mechanically maintained. The boundary should be expanded to include an area to the south.	This area is outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	No
3	BLM incorrectly cherry-stems a fence, which does not qualify as a significant impact.	Upon further review and reconsideration the BLM found the fence to be an insignificant intrusion and the cherry-stem has been removed.	Yes (See "B" on Map 2.4 in Section II)
4	A small section was not inventoried and is free of any impacts. The boundary should be expanded to include this area.	This area is on state land and is not part of the planning baseline.	No

MOONSHINE DRAW (Refer to Map 3.7)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
1	BLM fails to use a significant impact as the boundary and incorrectly uses a reclaimed route and section lines as boundaries. No inventory was performed past the reclaimed route. The boundary should be expanded to include the area which is free from any significant impacts.	Upon further review and reconsideration this area was determined to retain its natural character. Intrusions in the area have been determined to be insignificant impacts and the area has been added to the planning baseline. The area to the southeast of the boundary route is beyond the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	Yes (See "A" on Map 2.5 in Section II)
2	There are two roads, one on the eastern and one on the western portion of the inventory area, needed to access and maintain fences. These roads are also used by livestock operators and hunters.	The route on the west side forms a portion of the boundary of the inventory area. An access route was not found along the fence on the eastern side of the inventory area. Fence maintenance is permitted in the inventory area.	No
3	There are seven stock ponds within the eastern portion of the inventory area.	Four stock ponds were located in the eastern portion of the inventory area. Two stock ponds, located in the inventory area, were reevaluated and found to be substantially unnoticeable in the area as a whole. The other two stock ponds located along the southern boundary have been taken out of the planning baseline.	Yes (See "A" on Map 2.5 in Section II)

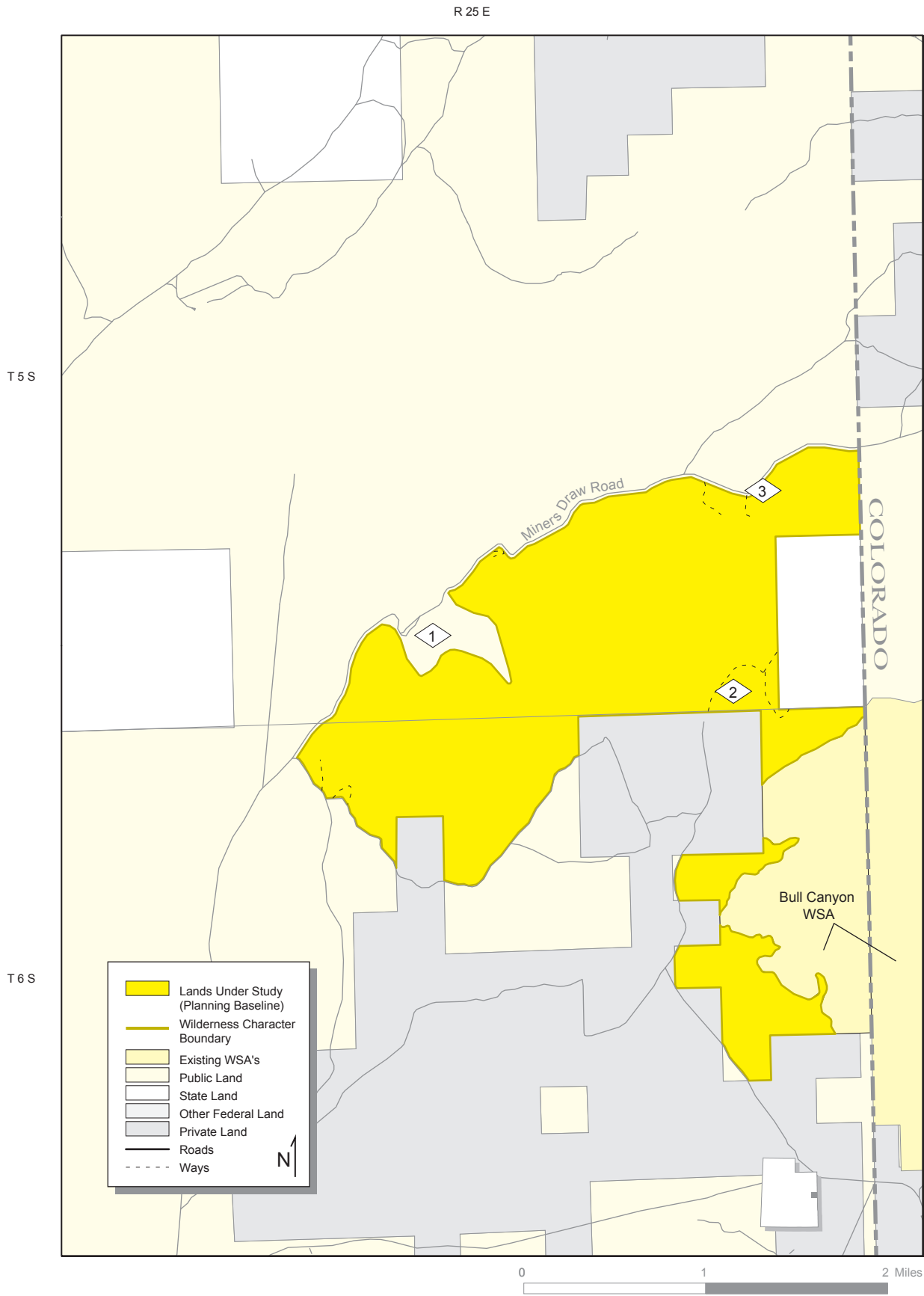
WHITE RIVER (Refer to Map 3.8)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
1	The boundary does not follow the edge of a significant impact. The boundary should be expanded to include an area to the north which is free of any significant impacts.	Upon further review the BLM found this area to be natural in character and it has been added to the planning baseline. A gas facility and its associated access route and a pipeline now form the northern boundary at this location.	Yes (See "A" on Map 2.6 in Section II)
2	BLM uses arbitrary section lines as the boundary, leaving out an area free of any significant impacts. The boundary should be expanded to include this natural area.	This area is outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	No
3	BLM incorrectly classifies Route A as a road and uses it as a boundary. The road/way form states the "only maintenance is use by vehicles". The boundary should be expanded past this reclaimed route.	Upon further review and reconsideration Route A was determined to be a vehicle way because it is not maintained and does not receive regular and continuous use. Lands to the north were found to be natural in character and the boundary has been expanded to include this area.	Yes (See "B" on Map 2.6 in Section II)
4	BLM fails to correctly classify Route H. The route should not be cherry-stemmed past the gas well, beyond which the route is not mechanically maintained.	Route H was determined to be a road because it meets all the criteria of the BLM road definition used for wilderness inventory purposes and the cherry-stem remains.	No

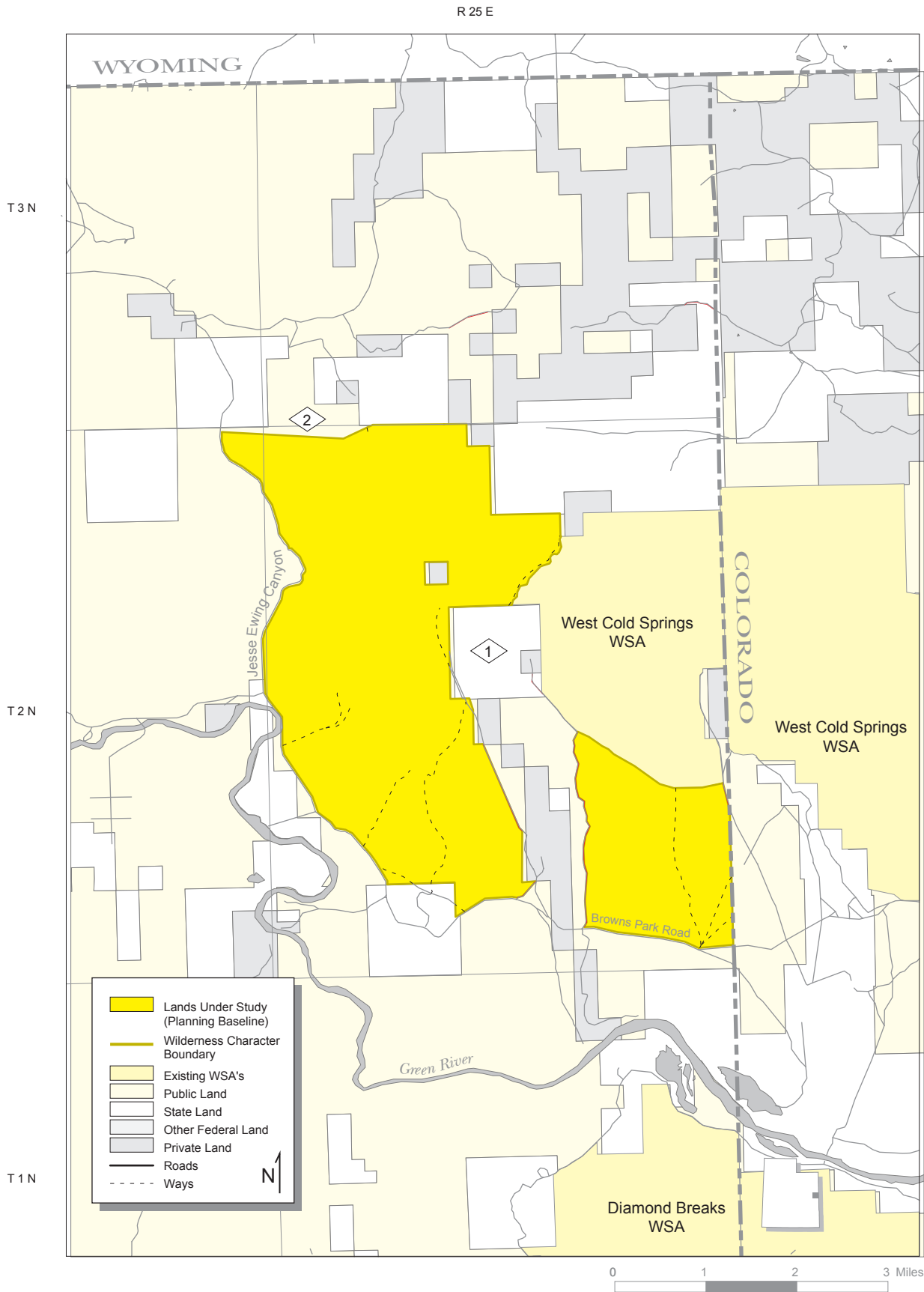
WHITE RIVER (Refer to Map 3.8)

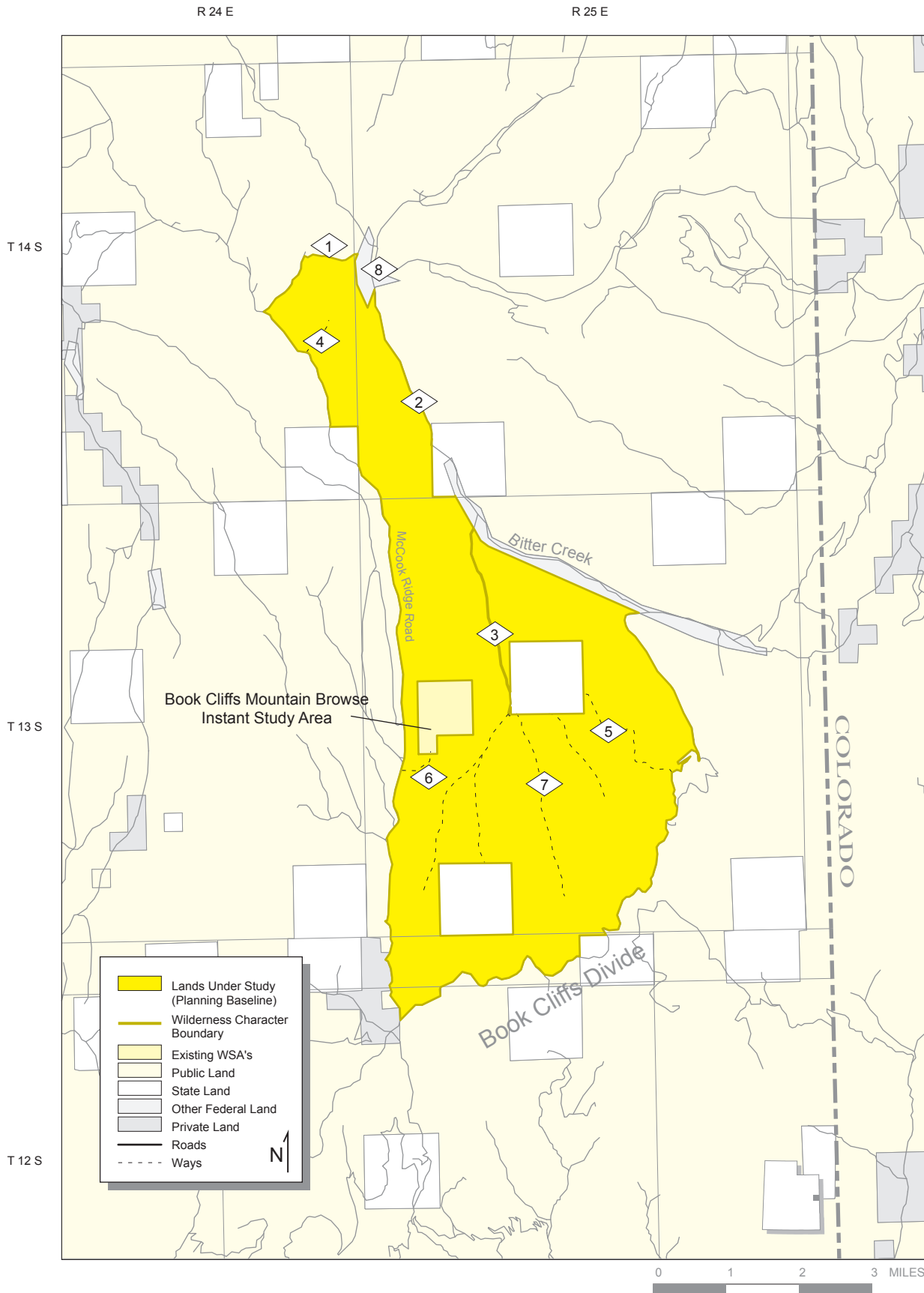
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
5	BLM uses an arbitrary section line as the boundary, excluding an entire natural area to the east. The boundary should be expanded to include this area.	The area to the east is outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	No
6	BLM incorrectly identified the road in Saddle Tree Draw as a way. This road is a Uintah County "Class D" road which is constructed and maintained.	This route, identified by the BLM as Route F, was determined to be a vehicle way because it is not maintained and does not receive regular and continuous use.	No
7	BLM incorrectly identified the road in Atchees Wash as a way. This road is a Uintah County "Class D" road which is constructed and maintained.	This route, identified by the BLM as Route G, was determined to be a vehicle way because it does not receive maintenance or regular and continuous use.	No
8	BLM incorrectly identified Route E as a way, it should be determined to be a road.	Route E was determined to be a vehicle way because it was not constructed, not maintained, and does not receive regular and continuous use.	No
9	This route was not inventoried or recognized by the BLM and should be determined to be a road.	This route was examined and determined to be a set of cross-country tracks down a wash leading to White River. The tracks were not constructed or maintained and do not receive regular and continuous use and were not recognized as either a road or a way.	No
10	BLM incorrectly identified Route C as a way, it should be determined to be a road.	Route C was determined to be a vehicle way because it was not constructed, not maintained, and does not receive regular and continuous use.	No
11	BLM incorrectly identified Route B as a way, it should be determined to be a road.	Route B was determined to be a vehicle way because it does not receive maintenance or regular and continuous use.	No
12	BLM incorrectly identified Route J as a way, it should be determined to be a road.	Route J was determined to be a vehicle way because it was not constructed, not maintained, and does not receive regular and continuous use.	No
13	This route was not inventoried or recognized by the BLM and should be determined to be a road.	This route, identified by the BLM as WR-1, was determined to be a vehicle way which leads to an unfinished drill pad. The route, in combination with the drill pad, has been determined to be a substantial impact on naturalness and has been cherry-stemmed from the planning baseline.	Yes (See "D" on Map 2.6 in Section II)

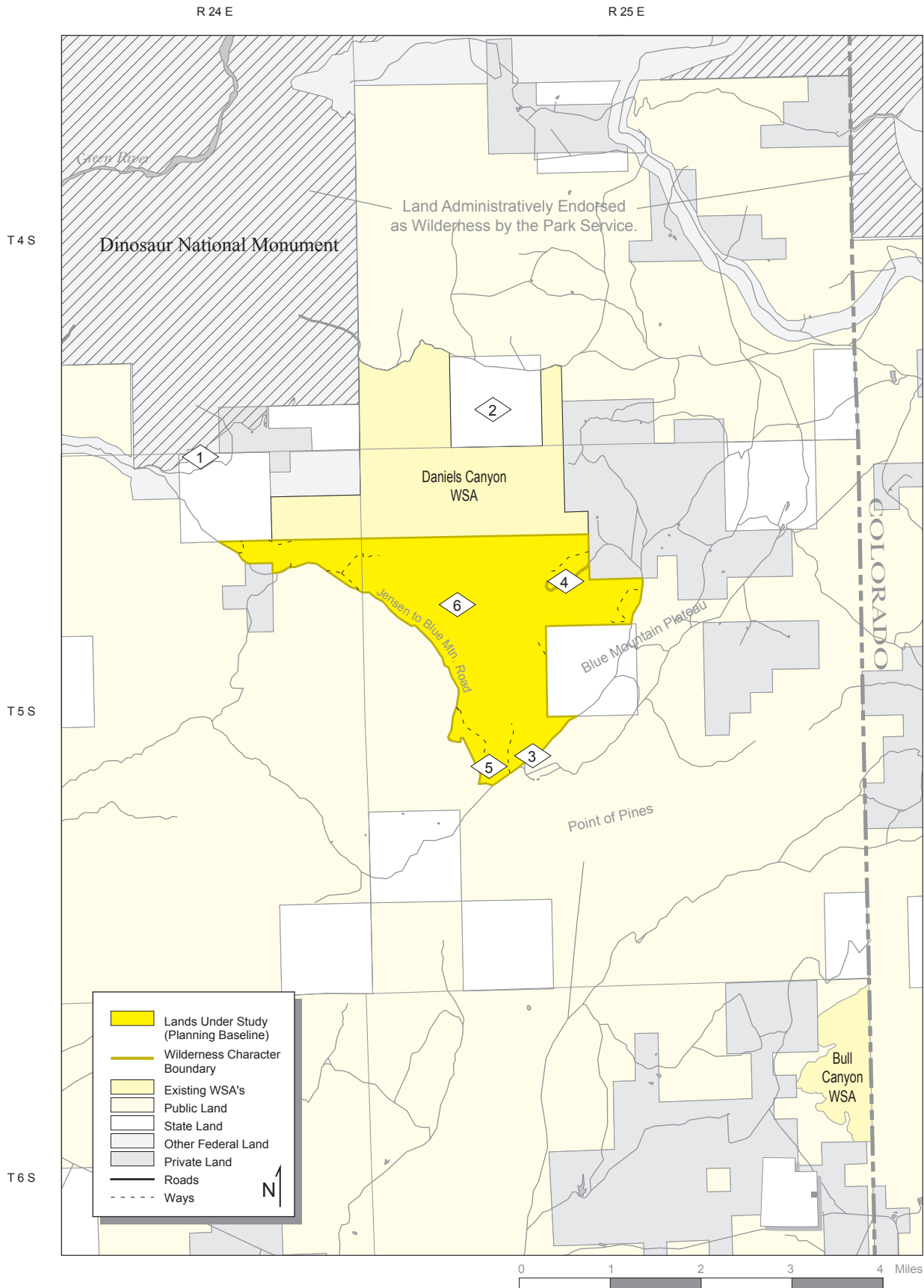
WILD MOUNTAIN (Refer to Map 3.9)

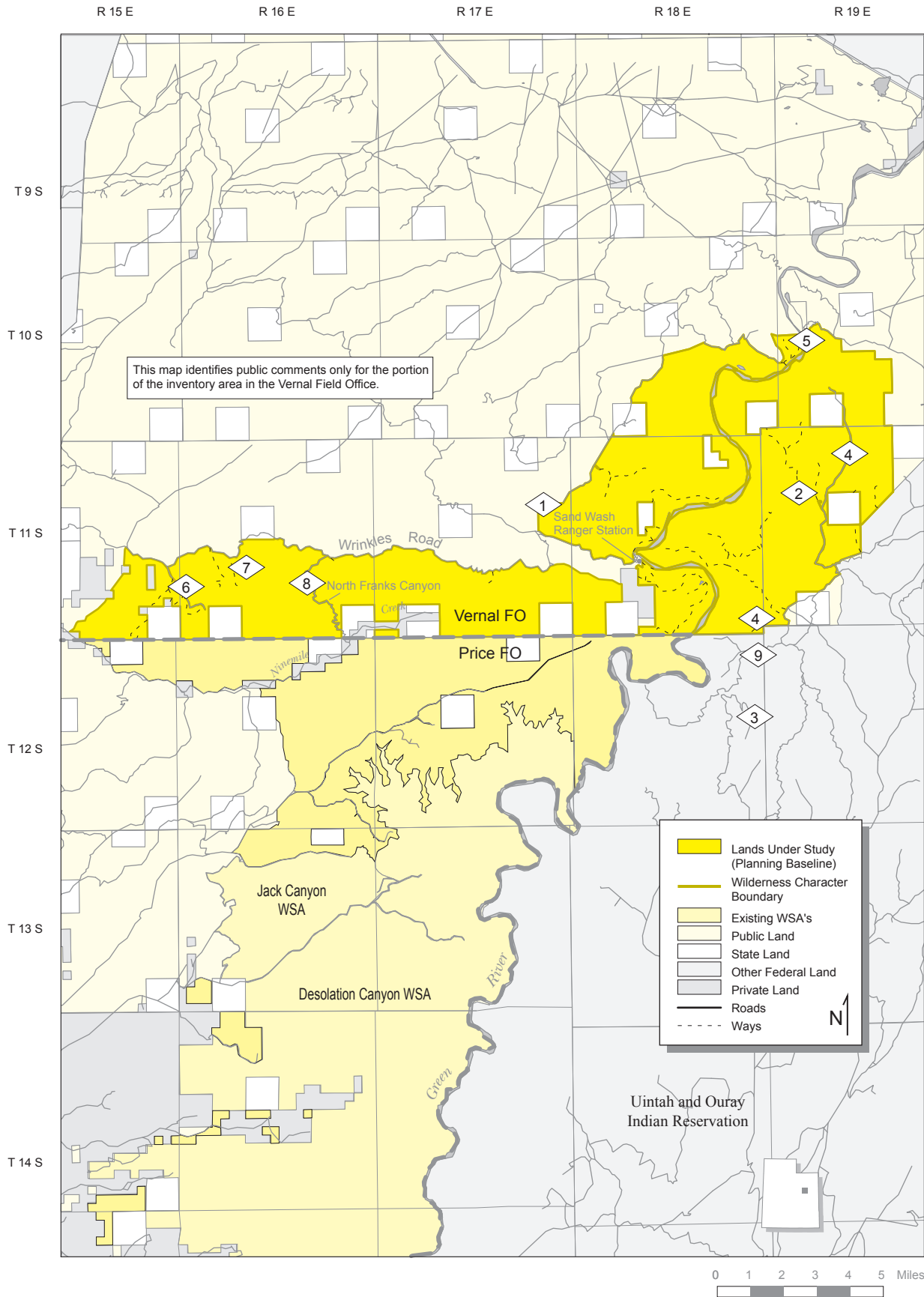
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASE LINE CHANGE
1	BLM fails to inventory beyond a very faint route and fence line. The boundary should be expanded to include an area free of any significant impacts.	This route and fence line are in an area severed from the inventory area by state lands and are not part of the planning baseline.	No
2	BLM fails to complete an inventory of the entire roadless area west of the Jones Hole Fish Hatchery, which is contiguous with the Wild Mountain inventory area. The route south of the fish hatchery is only a pack trail. The boundary should be expanded to include the entire roadless area.	The area to the west is outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	No

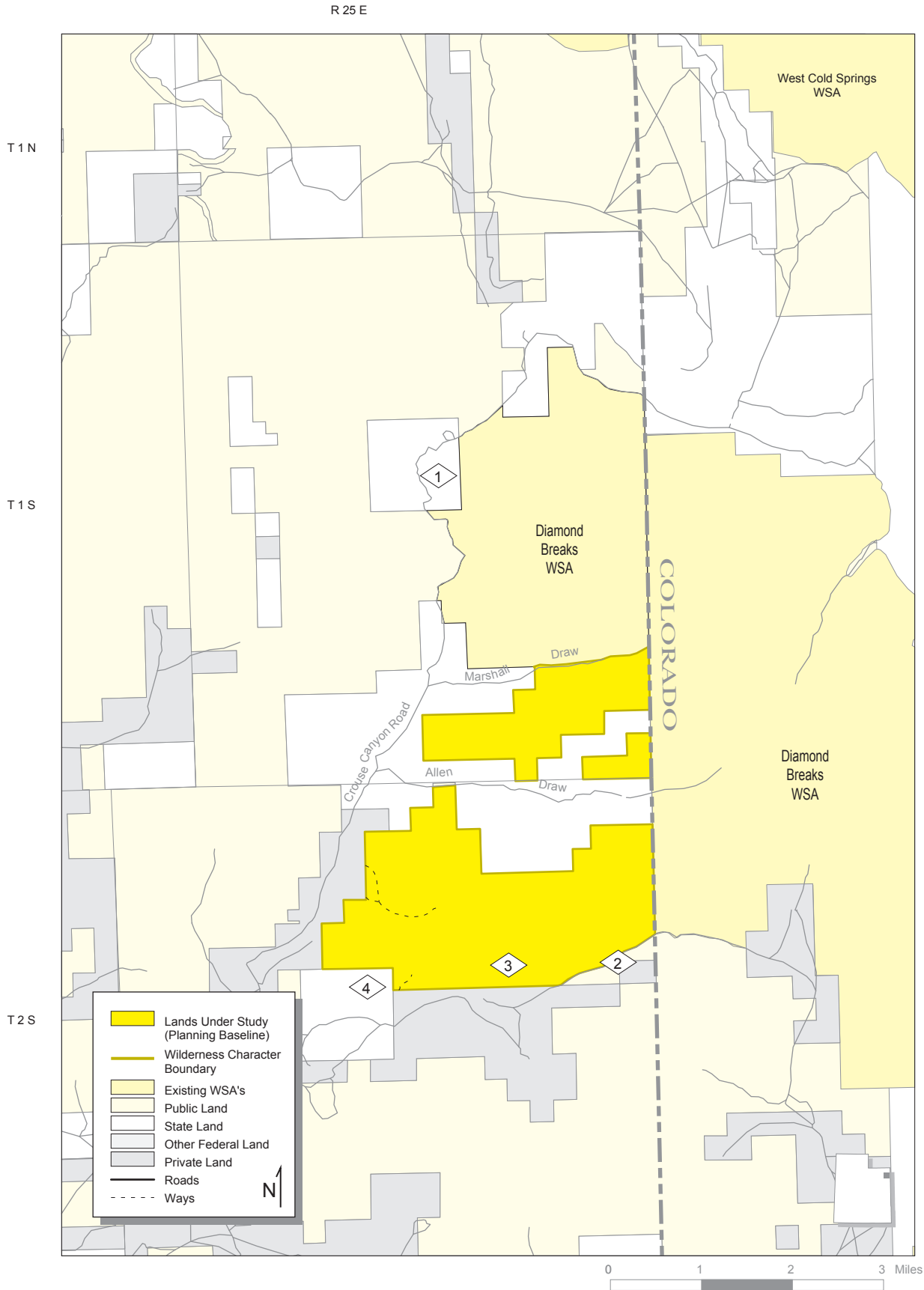


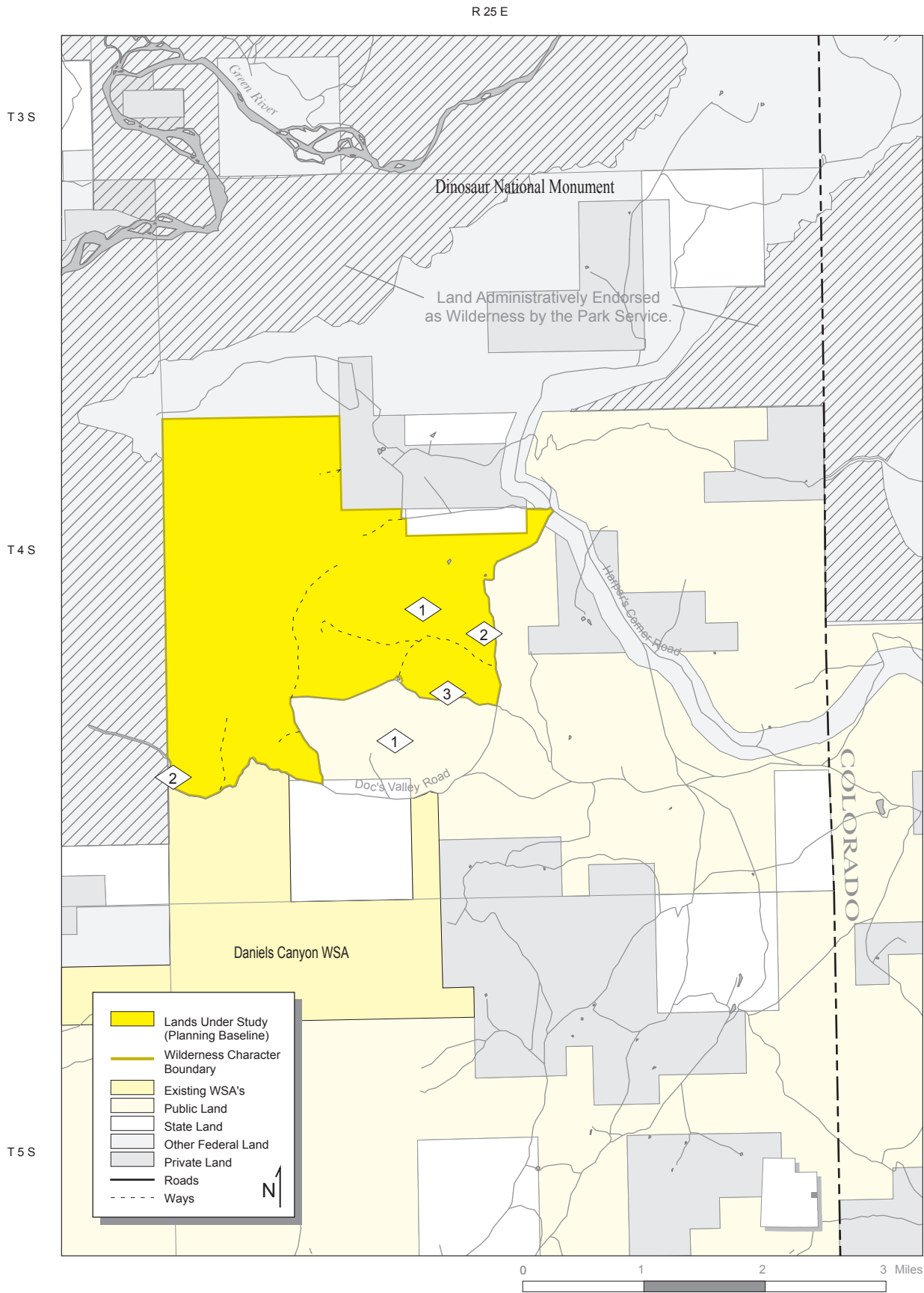


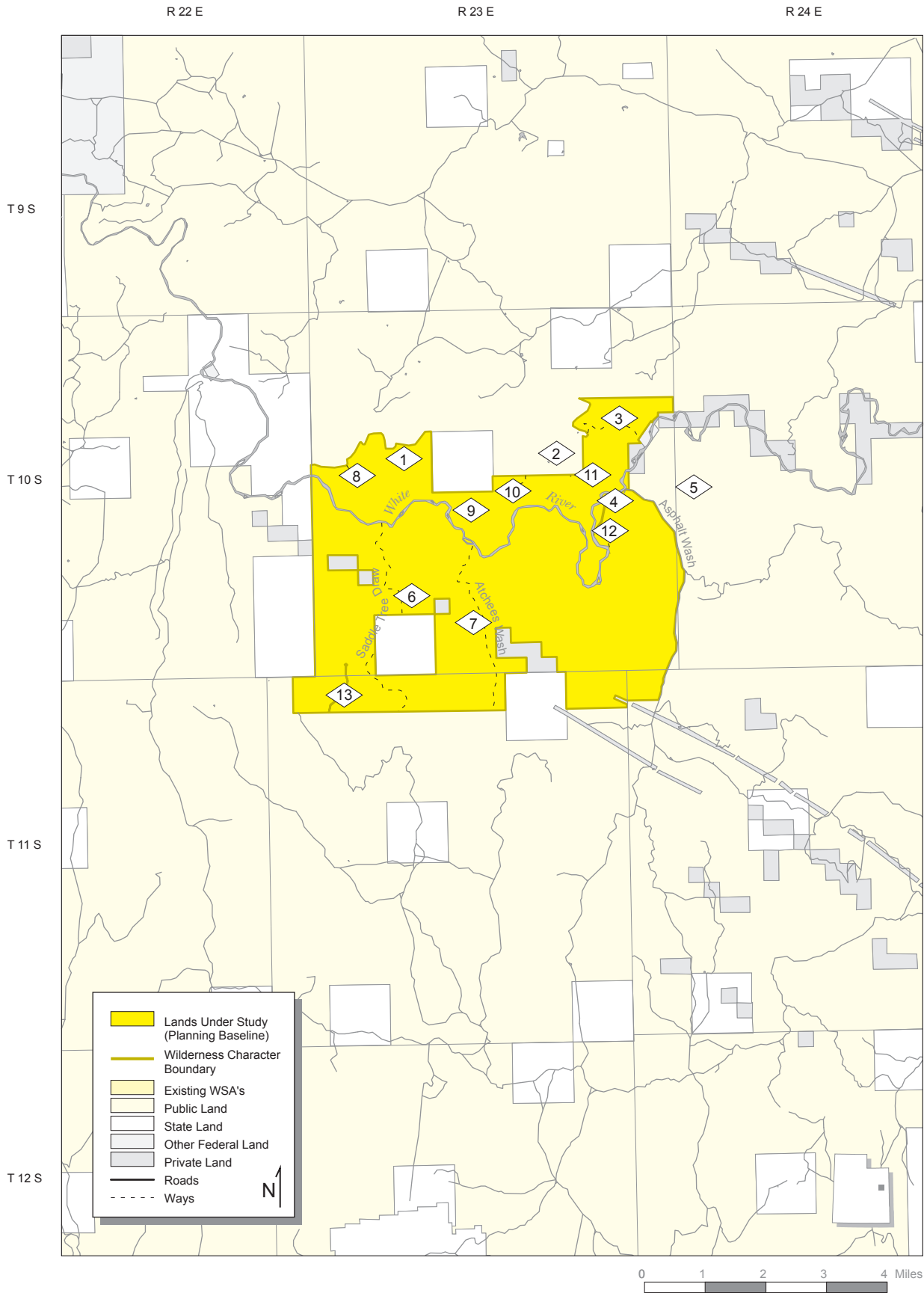


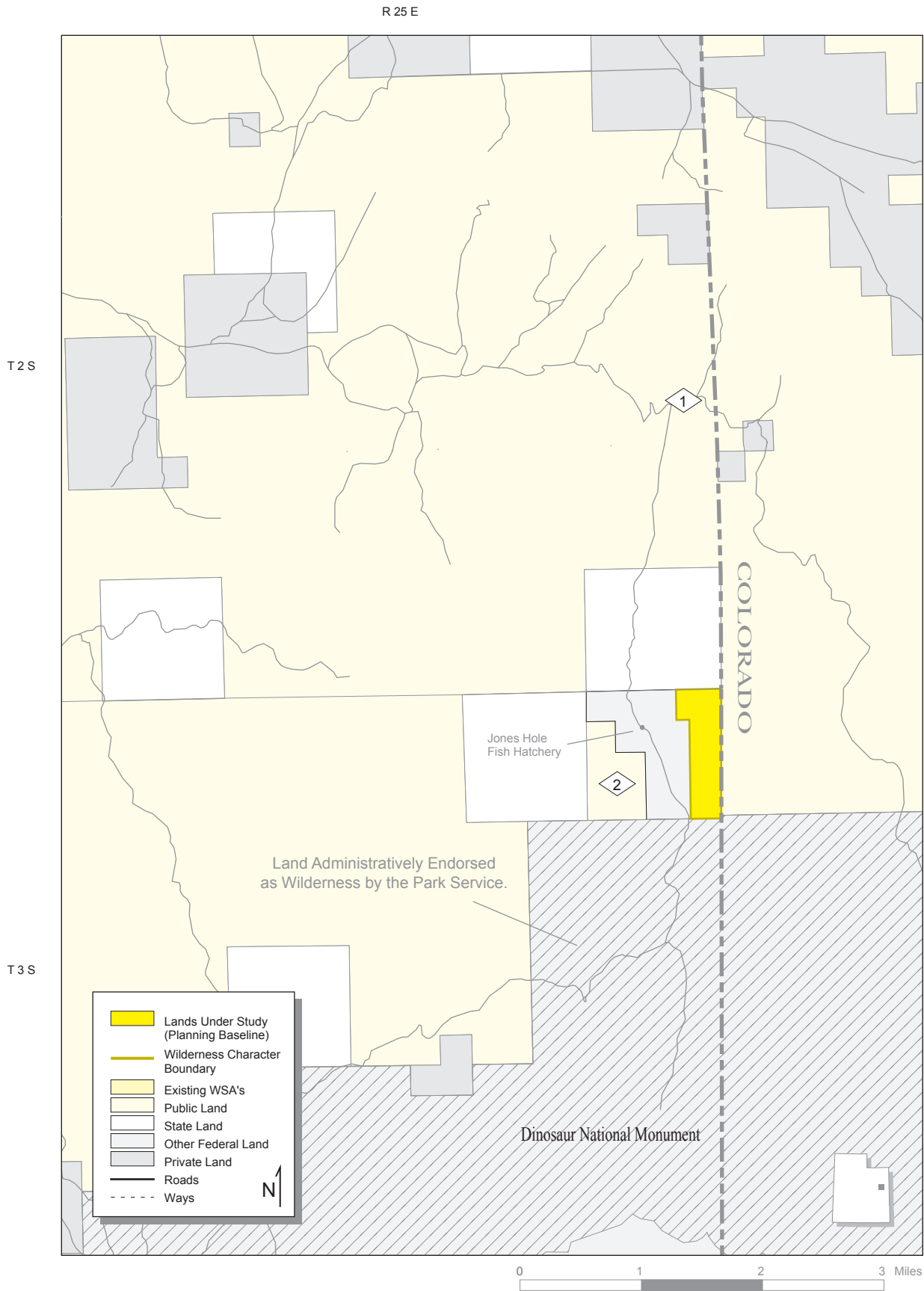












Glossary of Terms

Terms used in this document are defined as follows:

Cherry-stem: a dead-end road or feature that forms a portion of an inventory area boundary and that remains outside the inventory area.

Contiguous: lands or legal subdivisions having a common boundary; lands having only a common corner are not contiguous.

Inventory area: see definition for "wilderness inventory area."

Naturalness: refers to an area that "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." (From Section 2(c), *Wilderness Act* of 1964.)

Outstanding: standing out among others of its kind; conspicuous; prominent. Superior to others of its kind; distinguished; excellent.

Planning Baseline: lands found to have wilderness character in the *1999 Utah Wilderness Inventory* and revised, as necessary, based on public input and internal review.

Primitive and unconfined recreation: non-motorized, non-mechanized, and non-developed types of outdoor recreational activities.

Public land(s): any land and interest in land owned by the United States within the several states and administered through the Secretary of the Interior by the Bureau of Land Management, without regard to how the United States acquired ownership, except:

- lands located on the Outer Continental Shelf;
- lands held in trust for the benefit of Indians, Aleuts, and Eskimos; and
- lands where the United States retains the mineral rights, but the surface is privately owned.

Region: an area of land or grouping that is easily or frequently referred to by the public as separate and distinguishable from adjoining areas.

Road: a vehicle 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.

Roadless: refers to the absence of roads (see road definition above).

Roadless area: that area bounded by a road, using the edge of the physical change that creates the road or the edge of the right-of-way, other ownership, or water. The boundary of a roadless area may include one or more dead-end roads.

Solitude: the state of being alone or remote from others; isolation. A lonely or secluded place.

Substantially unnoticeable: refers either to something that is so insignificant as to be only a very minor feature of the overall area, or to a feature created or caused by human beings that is not distinctly recognizable by the average visitor because of age, weathering, biological change, or other factors.

Way: a vehicle route maintained solely by the passage of vehicles that has not been improved and/or maintained by mechanical means to ensure relatively regular and continuous use.

Wilderness: Section 2(c) of the *Wilderness Act* of 1964 defines wilderness as an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvement or human habitation, which is protected and managed so as to preserve its natural conditions, and which:

- 1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable;
- 2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation;
- 3) has at least five thousand roadless acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and
- 4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

Wilderness area: an area formally designated by Congress as part of the National Wilderness Preservation System.

Wilderness inventory area: a portion of public land evaluated to determine its roadless character and the presence of wilderness characteristics as defined in Section 2(c) of the *Wilderness Act of 1964*.

Wilderness program: a term used to describe all wilderness activities of the BLM, including inventory, planning, management, and administrative functions.

Wilderness review: the term normally used to cover the entire wilderness inventory, planning, and reporting phases of BLM's wilderness program; may also refer to other types of programs involving various aspects of wilderness information gathering.

Wilderness Study Area (WSA): a roadless area or island that has been inventoried and found to have wilderness characteristics as described in Section 2(c) of the *Wilderness Act of 1964* (78 Stat. 891), has been designated as a Wilderness Study Area, and is managed to preserve its wilderness character, subject to valid existing rights, pending a Congressional determination of wilderness.

