

Cedar City 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 Cedar City Field Office in southern Utah. Since the release of the *1999 Utah Wilderness Inventory* in February 1999, 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 planning effort and explains how public comments collected during the scoping phase for the 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 five inventory areas on the lands administered by the Cedar City 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 **within** four categories: 1) mapping corrections, 2) changes due to the exclusion of state lands along the perimeter boundaries of inventory areas, 3) changes in vehicle route cherry-stems; 4) 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 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 85,050 acres were on lands administered by the Cedar City 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.

However, in *Utah v. Norton*, the State of Utah, Utah School and Institutional Trust Land Administration, and the Utah Association of Counties filed suit challenging BLM’s authority to conduct wilderness inventories after completion of the FLPMA Section 603 identification, study, and recommendation processes. The Department of the Interior and the plaintiffs agreed to a settlement in April 2003.

The settlement acknowledges that (1) the BLM’s authority to conduct wilderness reviews, including the establishment of new WSAs, expired no later than October 21, 1993, with the submission of the wilderness suitability recommendations to Congress pursuant to Section 603 of FLPMA; and (2) the BLM is without authority to establish new WSAs. The settlement did not, however, diminish the BLM’s authority under Section 201 of FLPMA to inventory public land resources and other values, including characteristics associated with the concept of wilderness, and to consider such information during land use planning.

The BLM will no longer consider the designation of new WSAs in the Cedar City Field Office Resource Management Plan (RMP). Instead, the BLM will consider information on wilderness characteristics, together with information on other uses and values, when preparing land use plans. Lands with wilderness characteristics may be managed to protect and/or preserve some or all of those characteristics.

At the beginning of the statewide WSA planning process (prior to the lawsuit settlement), the BLM solicited public comments and encouraged dialog as part of the process to determine if additional lands should be designated as WSAs. During the first six months of that process the BLM received nearly 13,000 letters or other types of public input. These comments have been instrumental in the refinement of the 1999 inventory and the changes contained in this document.

Many of the wilderness inventory-related scoping comments submitted by the public in 1999 provided new information necessitating further BLM field review of specific lands and inventory findings in Cedar City. Field personnel revisited specifically identified inventory areas, some on several different occasions, to recheck areas and carefully consider the information provided by the public.

Numerous modifications to boundaries have been made in many of the inventory areas. 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.

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

On lands administered by the Cedar City Field Office, 85,050 acres were inventoried for the presence or absence of wilderness character. Of the inventoried acres, 80,050 were found to possess wilderness character. Lands with wilderness character were found in all five of the inventory areas.

Table 1-1 summarizes the wilderness character acres for inventory areas located on lands administered by the Cedar City 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 Cedar City Field Office

Inventory Area	Public Lands Inventoried (Acres)	Wilderness Character (Acres)
Central Wah Wah Mountains	59,200	58,400
Granite Peak	19,500	18,300
North Wah Wah Mountains*	2,100	1,710
Spring Creek	1,450	1,440
White Rocks Range	2,800	200
Total	85,050	80,050

*This acreage reflects only those portions of the inventory area under the administration of the Cedar City 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 website www.ut.blm.gov/wilderness.

Section II Reevaluation of Inventoried Lands

The thousands of comments that were submitted by the public 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 consideration in the Cedar City Revision. The

refined inventory findings identify lands that have wilderness character in nine of the ten inventory areas.

As a result of these internal and external reviews, adjustments have been made to the inventory in six of the nine inventory areas under consideration in the Cedar City RMP Revision. The changes can be broken down into four general categories: 1) mapping improvements and corrections; 2) the exclusion of state lands and contiguous federal land parcels too small to possess wilderness character; 3) changes in vehicle route cherry-stems and/or roads; and 4) 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 Cedar City, Utah, as well as in the Public Room at the Utah State Office in Salt Lake City, Utah.

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 teams. 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 on new maps showing wilderness character. 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 To Possess Wilderness Character

During the re-inventory 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 inventory area boundaries have been redrawn to exclude state lands.

In other areas of the state, 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.

Lands Acquired by the Utah West Desert Land Exchange Act of 2000 (West Desert Act)

The West Desert Act ratified the “Agreement for Exchange of Lands, West Desert State-Federal Land Consolidation” between the Secretary of the Interior and the Governor of Utah. Section 6 of that agreement states “...if any portion of the transferred lands are

wholly or partially encompassed within a wilderness study area created pursuant to Section 603 of FLPMA or other authority if applicable, or within a wilderness study area created by Congress under authority of the Wilderness Act, then those lands shall be administered, subject to valid existing rights, pursuant to applicable statutes and regulations governing wilderness study areas or wilderness areas, respectively.”

Thus, pursuant to the West Desert Act, acquired lands wholly or partially within 13 wilderness study areas (WSAs) identified in the Attachment are managed in accordance with: (1) the protective mandate of Section 603 (c) of FLPMA; (2) all regulations applicable to WSA management; (3) H-8550-1, *Interim Management Policy for Lands Under Wilderness Review* (IMP); and (4) management plan decisions specific to each WSA, including off-highway vehicle designations. Because the lands wholly or partially within the 13 WSAs were legislatively acquired for specific purposes as articulated in the Agreement and the West Desert Act, they are closed to mineral location consistent with applicable case law. Pursuant to the Federal Onshore Oil and Gas Reform Act of 1987 and the IMP, they are closed to mineral leasing.

However, Congress has not directed that the lands shall automatically become part of the WSAs or wilderness, but simply that they be managed as such. Therefore, the acquired lands are not counted in the total acreage of the WSA or wilderness, and are to be identified as “acquired lands managed as WSAs” or “acquired lands managed as wilderness” as appropriate.

Of the three WSAs within the Cedar City Field Office, only the southern portion of the Wah Wah Mountains WSA contained acquired acreage. Only two of the wilderness inventory areas; Central Wah Wah Mountains and Granite Peak contain acquired acreage.

Table 1-2 summarizes the acres for inventoried state lands recently acquired through the Utah West Desert Land Exchange Act of 2000 now administered by the Cedar City Field Office, that were part of the *1999 Utah Wilderness Inventory*.

Table 1-2: Utah West Desert Land Exchange Act of 2000 for the Lands Administered by the Cedar City Field Office

Inventory Area	Acres of Exchanged Inventoried State lands now within WSA or administered under IMP	Acres of Exchanged State lands within Inventory Area with Wilderness Character
Central Wah Wah Mountains	0	6,345
Granite Peak	0	2,320
North Wah Wah Mountains*	206	0
Spring Creek	0	0
White Rocks Range	0	0
Total	206	8,665

*This acreage reflects only those portions of the inventory area under the administration of the Cedar City Field Office.

Changes in Cherry-stems

Cherry-stems are inventory area boundaries that exclude dead-end roads and substantially noticeable intrusions including some vehicle ways or other significant man-made features that impact natural character. Cherry-stems are not considered part of the inventory area.

All dead-end vehicle routes that meet the BLM road definition used for wilderness inventory purposes have been cherry-stemmed. The Rock Corral Road in the Granite Peak inventory area is an example of a road cherry-stem. This road provides access to developed picnic area near Rock Corral Springs. The road was constructed, is maintained, and receives regular and continuous use by recreationists and others. This road forms part of the boundary of the inventory area and extends into the inventory area.

In other instances, dead-end vehicle routes that do not meet the BLM road definition (vehicle ways), but constitute a substantially noticeable intrusion, have also been cherry-stemmed. Vehicle way “Y” in the Central Wah Wah inventory area is one such example. This route extends from the inventory boundary along state road 21 for 1.7 miles to a mining area near the top of Corral Canyon. This vehicle way was constructed and receives regular and continuous use; however, it does not meet all criteria of the BLM road definition used for wilderness inventory purposes because evidence of maintenance is lacking. It was cherry-stemmed out of the inventory area because surface disturbances associated with use have substantially impacted natural character.

The following list identifies where changes have been made to the inventory related to cherry-stems that form inventory area boundaries.

North Wah Wah Mountains

One cherry-stem removed.

Granite Peak

One cherry-stem adjusted to reflect the correct location of the road.

Changes in Wilderness Character Findings

Some changes to the 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 or addition of small parcels (less than 100 acres) of BLM land as a result of man-made intrusion that may or may not impact natural character.

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

Reevaluations of wilderness character have resulted in a reversal of the BLM’s initial findings in several instances. Parcels of BLM land have been added or removed from the wilderness character of two inventory areas. This change is summarized in the paragraph below and reasons for this modification in the affected inventory area.

Central Wah Wah

Reduction of 120 acres

To accommodate the expansion of a mining patent, approximately 120 acres have been excluded from the area with wilderness character in the vicinity of Pine Grove.

Central Wah Wah

Addition of 329 acres

After a field evaluation, approximately 329 acres have been added to the area with wilderness character in section 29, T.27 S., R. 14 W. Area had been excluded because of numerous intrusions. The field evaluation found limited intrusions in the area, none were substantial with the exception of two stock tanks which have been excluded from the area.

North Wah Wah

Addition of 122 acres

As the result of a field evaluation, approximately 122 acres in the vicinity of Pierson Cove have been added to the area with wilderness character. The area had been excluded because of numerous intrusions. The field evaluation found no intrusions in the area.

North Wah Wah

Reduction of 206 acres

As a result of the West Desert Land Exchange Act of 2000, approximately 206 acres of inventoried state land between Wah Wah Cove and Long Valley is now managed by BLM as public land. The Act specifically directed the BLM to administer this acquired state acreage under IMP which is a similar management practice as the existing Wah Wah Mountain Wilderness Study Area and the acreage has been excluded from the area with wilderness character.

Summary of Changes By Inventory Area

All the modifications previously identified as changes to the inventory are summarized and located on maps in this section.

Tips On Using the Maps in this Section

The “Inventory Modifications” maps (Maps 2.1 to 2.3) show the original lands found to have wilderness character in the *1999 Utah Wilderness Inventory* and the changes identified in this document. 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 boundaries of inventory areas mapped in the *1999 Utah Wilderness Inventory* is 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 with wilderness character are depicted as dark yellow. 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.

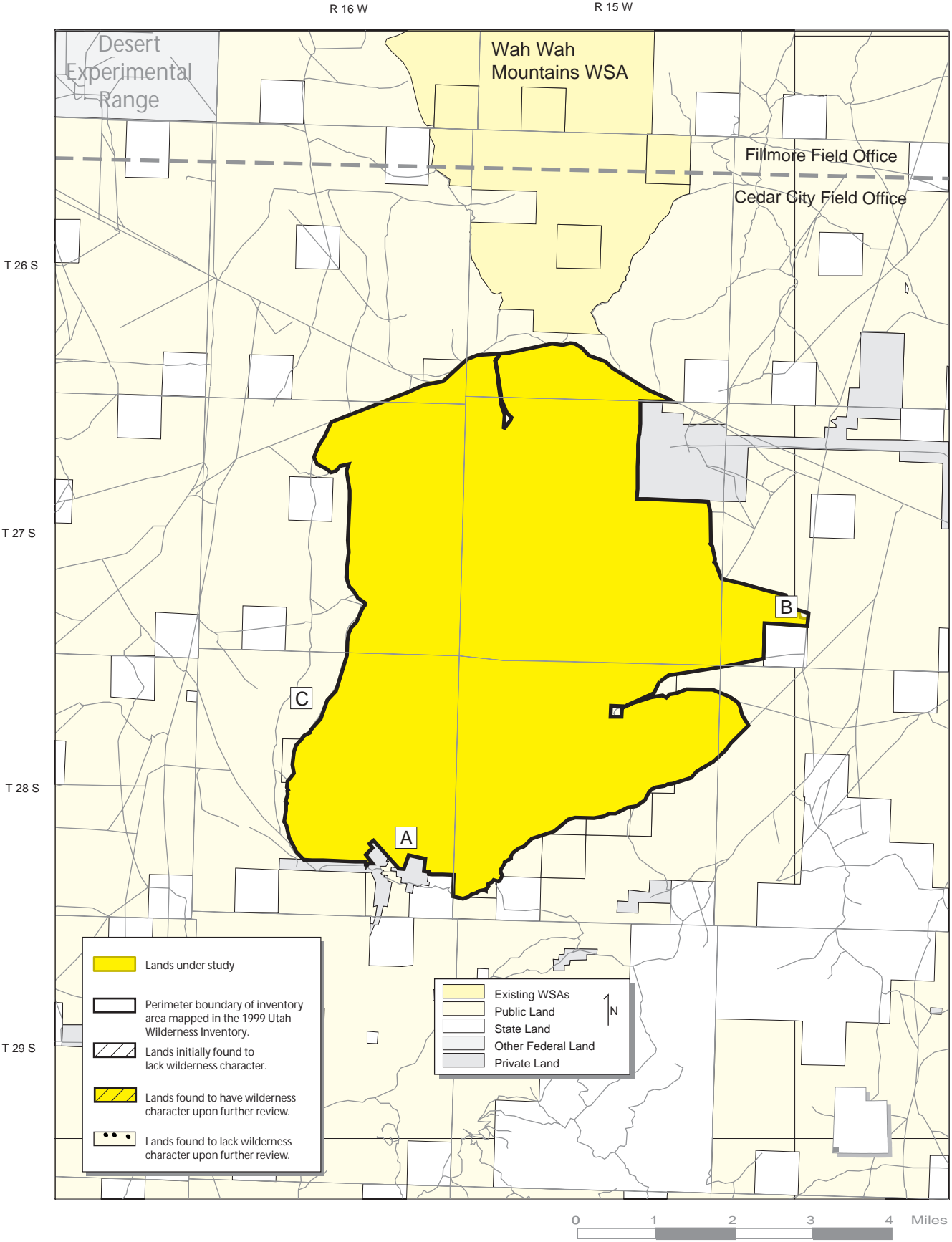
Table 2-1: Summary of Changes by Inventory Area

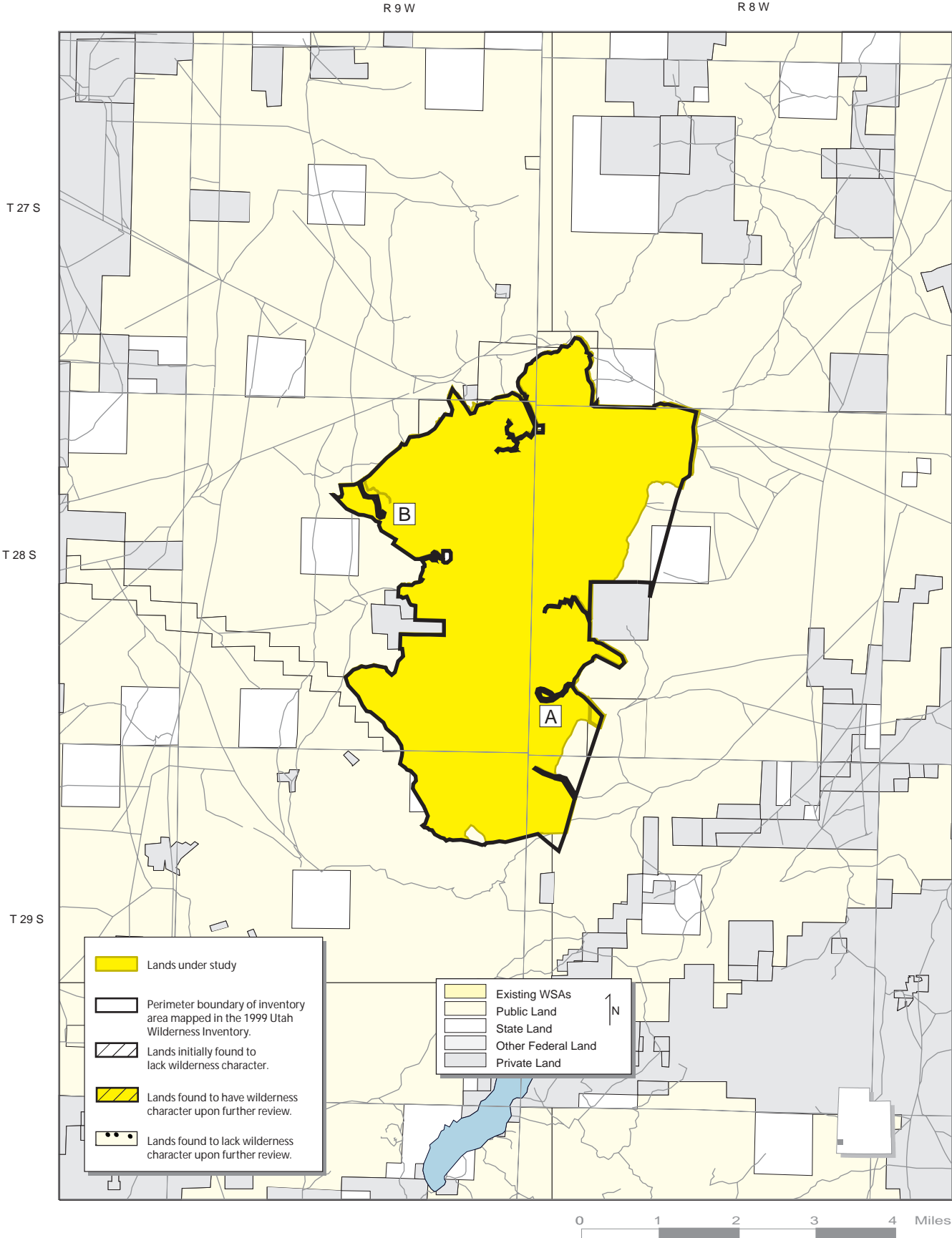
INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
Central Wah Wah (Refer to Map 2.1)	A. Reduction of approximately 120 acres to accommodate mine patent.
	B. Addition of 329 acres to the area with wilderness character. Area was found to be natural in character after a field evaluation.
	C. Mapping adjustment along west side boundary (pipeline) has been made to show corrected boundary line.

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
Granite Peak (Refer to Map 2.2)	A. Mapping adjustment to show corrected location of cherry-stem road.
	B. Mapping adjustment to show corrected location of cherry-stem and cabin.

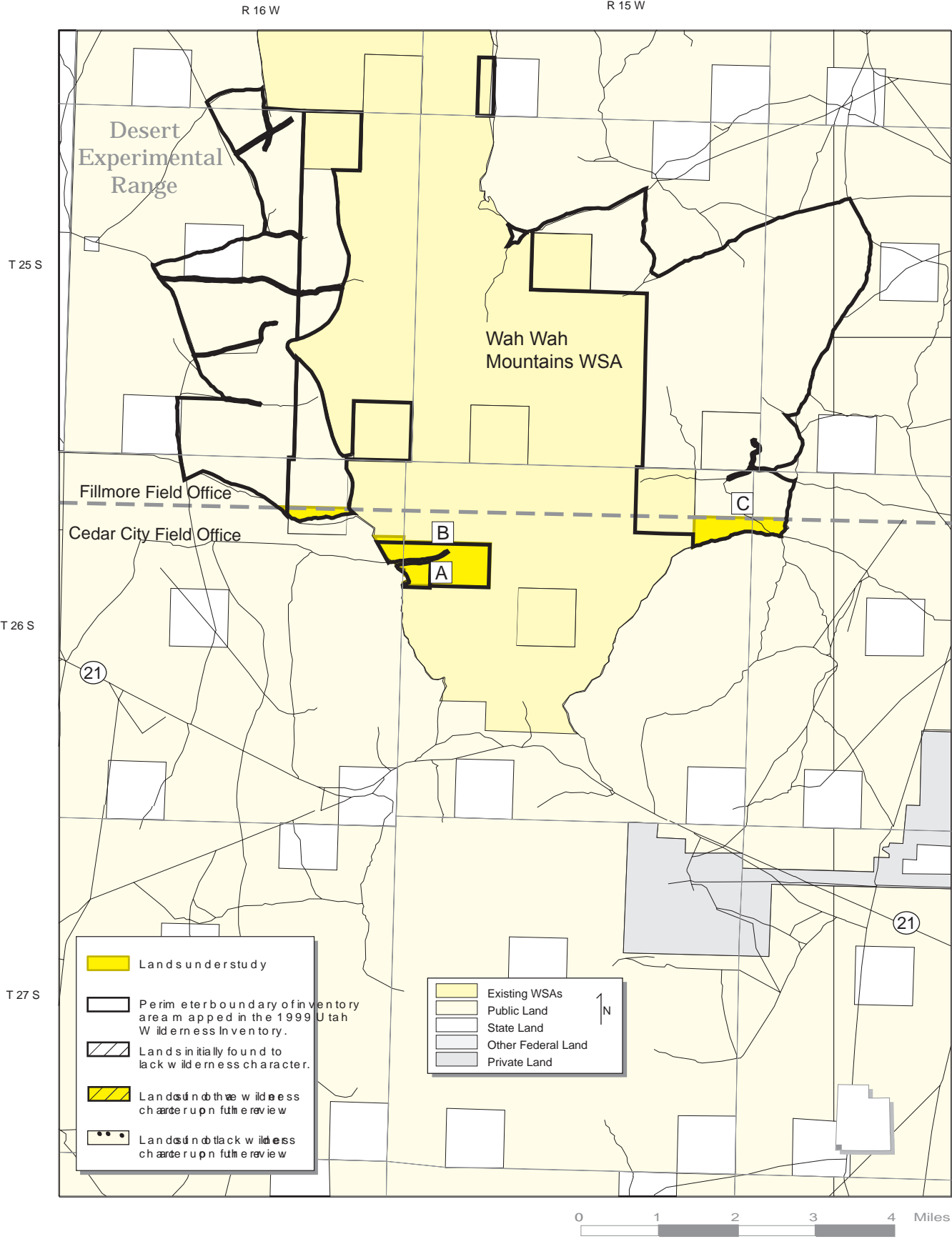
INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
North Wah Wah (Refer to Map 2.3)	A. Addition of approximately 123 acres to the area with wilderness character. Area was found to be natural in character after a field evaluation.
	B. Cherry-stem removed from route that was determined to be a non-substantial way.
	C. Approximately 206 acres have been excluded from the area with wilderness character because of the West Desert Land Exchange of 2000.

No modifications to the areas with wilderness character were made to the following inventory area except for the exclusion of state lands: **Spring Creek, White Rocks Range**





MAP 2.2



MAP 2.3

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 revised wilderness character acres identified in this revision document. The revised acreage of lands with wilderness character 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 revised acreage of lands with wilderness character 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 Area	Wilderness Character Acres Identified in the <i>1999 Utah Wilderness Inventory</i>	Revised Wilderness Character Acres
Central Wah Wah Mts.	58,400	52,072
Granite Peak	18,300	17,028
North Wah Wah Mts. *†	1,710	1,569
Spring Creek	1,440	0
White Rocks Range	200	0
Total	80,050	70,669

*This acreage reflects only those parcels of these inventory areas under the administration of the Cedar City Field Office.
 †This acreage does not include state lands recently acquired and currently administered under IMP.

Section III Inventory-Related Scoping Comments and BLM Responses

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 scoping process.

Many public 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*

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.
- Team members reviewed available information, such as previous wilderness inventory findings.
- 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 characteristics as 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 is 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 directed teams to use rights-of-way (ROWS) as boundaries of inventory areas. But other valid existing rights, such as mineral leases, are not criteria used in the inventory, unless those uses resulted in impacts on the ground.

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

Bureau policy directed inventory teams to use rights-of-way (ROWS) as boundaries of wilderness inventory areas. It does not matter whether the facilities authorized by the ROW are above ground such as, power lines or underground such as buried pipelines in which 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.

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.

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, Bureau policy 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 an 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 criterion 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 criterion 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 criterion 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 totally free of human development to be considered natural. Evidence of past human development or activity can be present in an inventory area as long as it is not substantially noticeable.

How does the BLM apply the wilderness criterion 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 criterion 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."

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.

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 that have or do not have wilderness characteristics. It is not BLM's recommendation to Congress regarding which areas should be designated as wilderness.

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 was identified as a way. However, in the inventory, 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 was 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 inventory allowed for selective cherry stemming excluding roads and other substantially noticeable intrusions on naturalness. Inventory teams use professional judgment on a case-by-case basis to decide when cherry stemming is appropriate. During the wilderness re-inventory, 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 of an area as a whole.

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

Numerous people inventoried a 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.

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 the five inventory areas in the Cedar City 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 3.5). 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.

CENTRAL WAH WAH MOUNTIANS (Refer to Map 3-1)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM has extended the cherry-stem on way “Y” beyond the extent of use. The cherry-stem should be shortened to the point where use drops off.	Way “Y” does not meet the BLM road definition because of the lack of maintenance. The way is however, a significant and cumulative impact along with some of the mining scars to the naturalness of the area.	NO
2	The northern boundary of the unit appears to be set on the highway. A powerline also follows this road and should be used as the boundary instead of the highway.	An examination of the inventory file maps indicates that the wilderness character boundary is in the correct position. It follows both the powerline and the highway where necessary.	NO
3	The BLM has excluded the bench land and valley bottom in this area. They are natural in character and this type of terrain is not represented in the WIA. The area	The area in sections 18 and 19 are outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> . A field evaluation in Section 29 found the	YES (See “A” on Map 3-1)

CENTRAL WAH WAH MOUNTIANS (Refer to Map 3-1)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	should be part of the area with wilderness character.	intrusions identified in the inventory file not to be substantial. Approximately 329 acres have been added to the area with wilderness character. Two large stock tanks on the east side of the area have been excluded.	
4	The BLM boundary on the west uses a buried pipeline. The position of this line is not clearly identified on 7.5 maps. The pipeline location should be established with a GPS.	The boundary has been spot checked with GPS and aerial photography; necessary adjustments have been made.	YES (see "C" on Map 3-1)
5	The pipelines and fence lines in the area around Kiln Springs are under Title V and should not be included in the proposed wilderness area. These are held in conjunction with an easement from the adjoining state land section.	The Title V pipeline; private land around Kiln Spring have been excluded from the area with wilderness character. As a result of the Utah West Desert Land Exchange Act of 2000 , the state land section adjoining Kiln Springs is now administered as public land. Inventory determinations of wilderness character have been carried forward.	NO

GRANITE PEAK (Refer to Map 3-2)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM has excluded a largely natural shoulder of the mountain along with a single mining impact. The natural portion of the mountain should be placed back into the area with wilderness character.	The boundary follows the edge of mining disturbances excluding these mining impacts and several chainings that are determined not to be natural in character.	NO
2	BLM has excluded natural areas along with some mining activity. The areas beyond the mining activity are not impacted and should be included in the area with wilderness character.	This area contains mining disturbance along the lower slopes. The inventory determined that by using the fire road on the south and the road on the north a identifiable boundary could be established.	NO
3	BLM has cherry-stemmed a route that does not meet the definition of a road. The GIS placement of the route also is incorrect. The cherry-stem should be removed.	The cherry-stem shown on the GIS data is a mapping error. The cherry-stem road is "P" which crosses Shag Hollow southwest of Mud Spring.	YES (See "A" on Map 3-2)
4	The BLM GIS map shows the location of this cherry-stem and cabin in the wrong place. The cabin should be place further north.	This is a mapping error that has been corrected.	YES (See "B" on Map 3-2)
5	There is an active "Perlite mine"	The "Perlite mine" and associated facilities is	NO

GRANITE PEAK (Refer to Map 3-2)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	in sec(s) 1, 2, 11, 12 T.27 S; R. 9 W that should be excluded from the area with wilderness character.	located in T.26 S which is one township north of the inventory area. They are not included in any inventory area.	

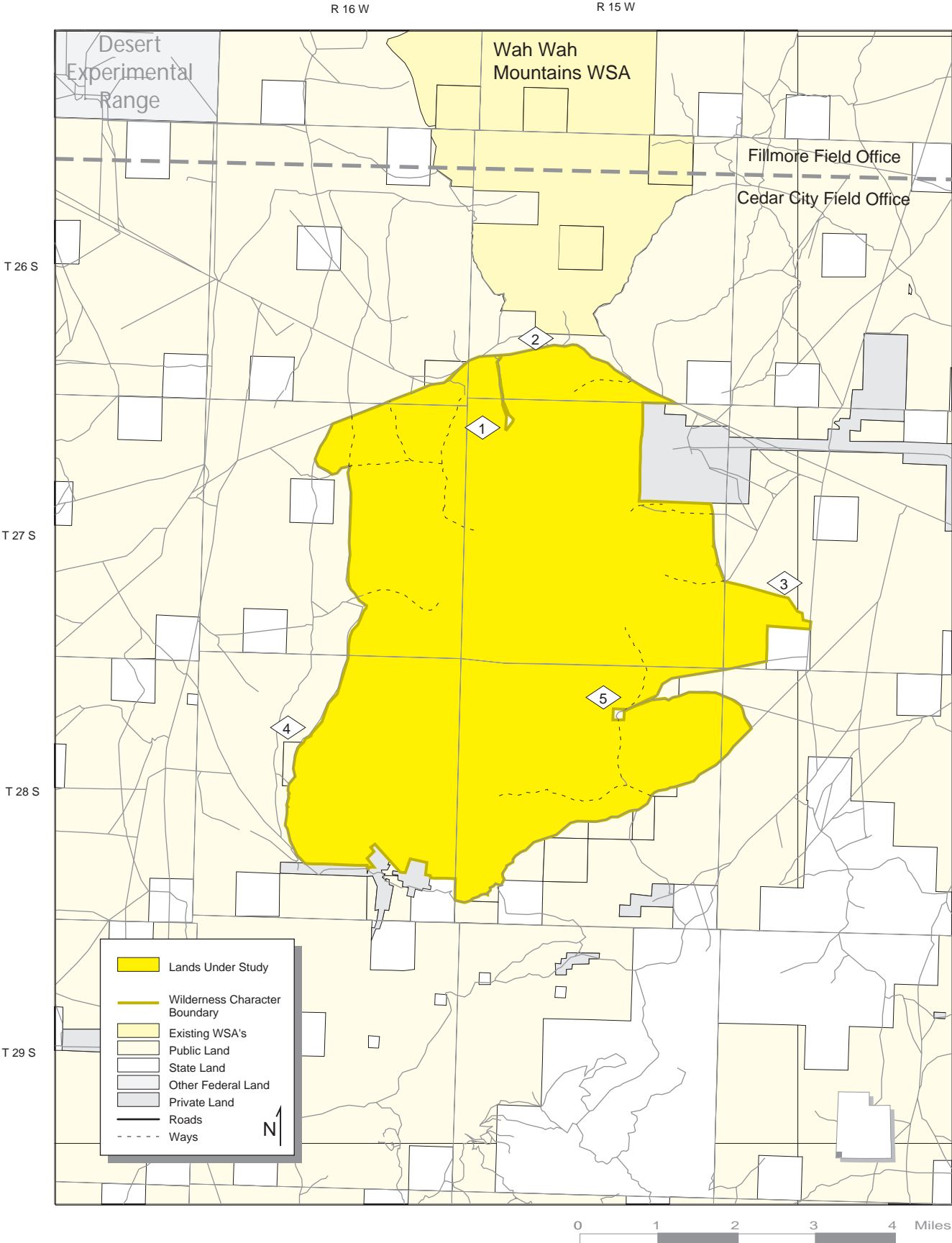
NORTH WAH WAH MOUNTIANS* (Refer to Map 3-3)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM has not inventoried a faint way south of Pierson Cove that is used as the boundary of the unit. This route is very faint and should not be used as a boundary. The natural area to the west should be included in the inventory area.	The faint way is the existing WSA boundary, the area west of the WSA boundary was not identified as part of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> and has not been inventoried. That inventory has been completed; to examine the area now would require a new inventory.	NO
2	BLM's field work found this route to be a way. But the route has been modified with a comment indicating "final map for digitizing shows route cherry-stemmed, therefore I changed Pete's conclusion to a road". The initial BLM determination is correct; the route is not a road. The cherry-stem should be removed.	Upon further field evaluation, the field team determined that this route is actually a way. While construction is apparent, there is no evidence of maintenance or regular and continuous use. The cherry-stem has been removed.	YES (See "B" on Map 3-3)
3	BLM removed a faint way #23 and a wildlife guzzler from wilderness study. The area is natural in character and should not be removed from the area.	Upon further field review, it was determined that a mapping error had occurred during inventory. The wildlife guzzler, fence and way are not located at the site as indicated in the field maps. The approximate 123 acres that were excluded have been placed back in the area with wilderness character.	YES (See "A" on Map 3-3)
4	BLM used a faint vehicle route in Long Valley as the southeastern boundary of the WSA excluding an additional 5,000+acres from wilderness study. This area should be included in the WSA.	The faint way is the existing WSA boundary, the area east of the WSA boundary was not identified as part of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> and has not been inventoried. That inventory has been completed; to examine the area now would require a new inventory.	NO

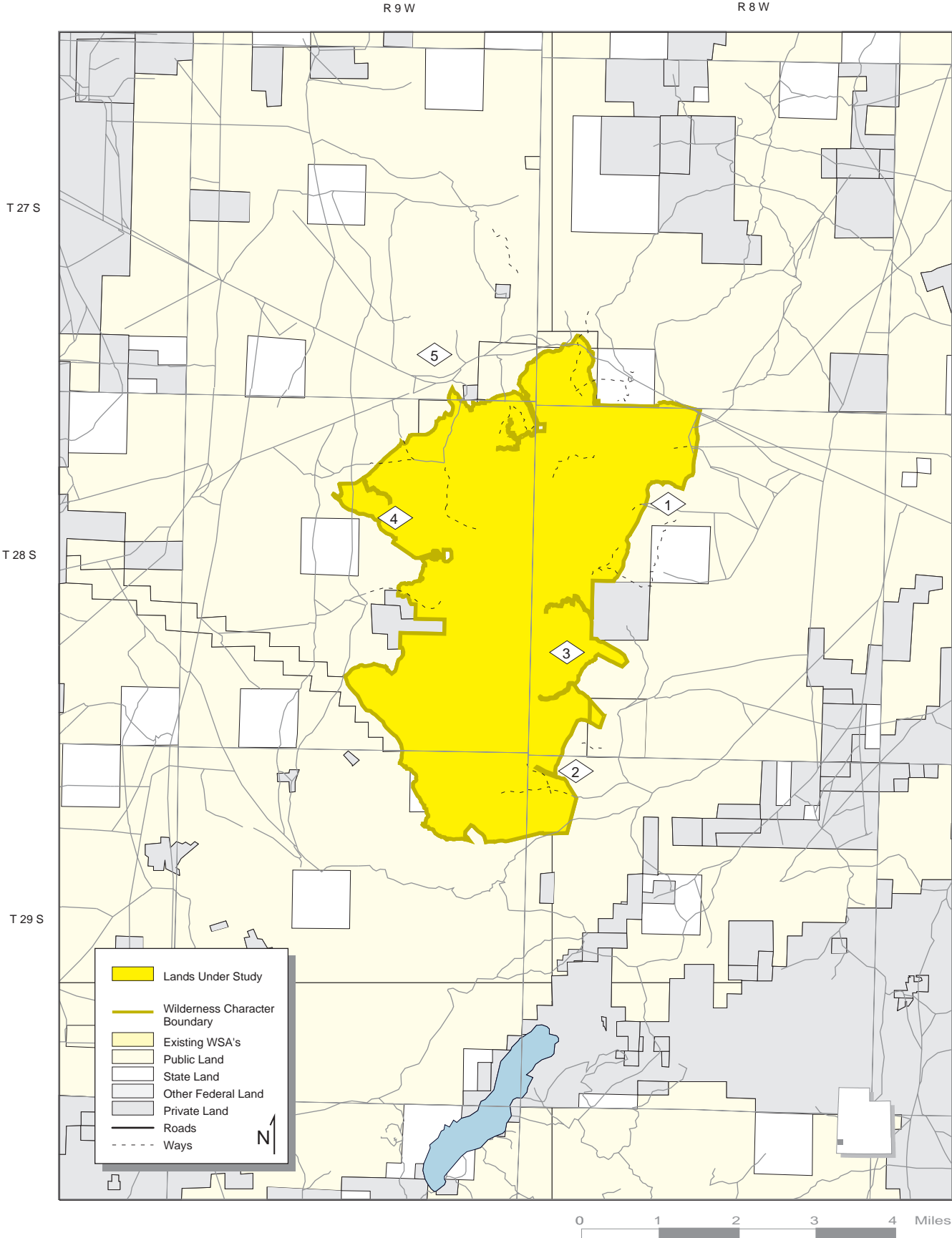
***Additional public comments received concerning the North Wah Wah Mountain WIA refer to sites located outside of the area administered by the Cedar City Field Office and are not listed here. Responses to these comments can be viewed in the North Wah Wah Mountain WIA Revision File for the Filmore Field Office.**

SPRING CREEK(Refer to Map 3-4)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	A cherry-stem must be established through Kanarra Creek to allow the town of Kanarraville the ability to maintain and upgrade the culinary water facilities located there.	The establishment of a cherry-stem in Kanarra Creek would be within the existing WSA and is not subject to the findings of the <i>1999 Utah Wilderness Inventory</i> .	NO
2	SITLA lands have been included in the inventory. These should be removed from the inventory because BLM does not have administrative authority on these lands.	While all state lands have been excluded from all of the areas inventoried during the <i>1999 Utah Wilderness Inventory</i> , the recent West Desert Land Exchange Act of 2000 has resulted in some state lands reverting to BLM. None of the state lands in the inventory area are affected by the Act.	YES

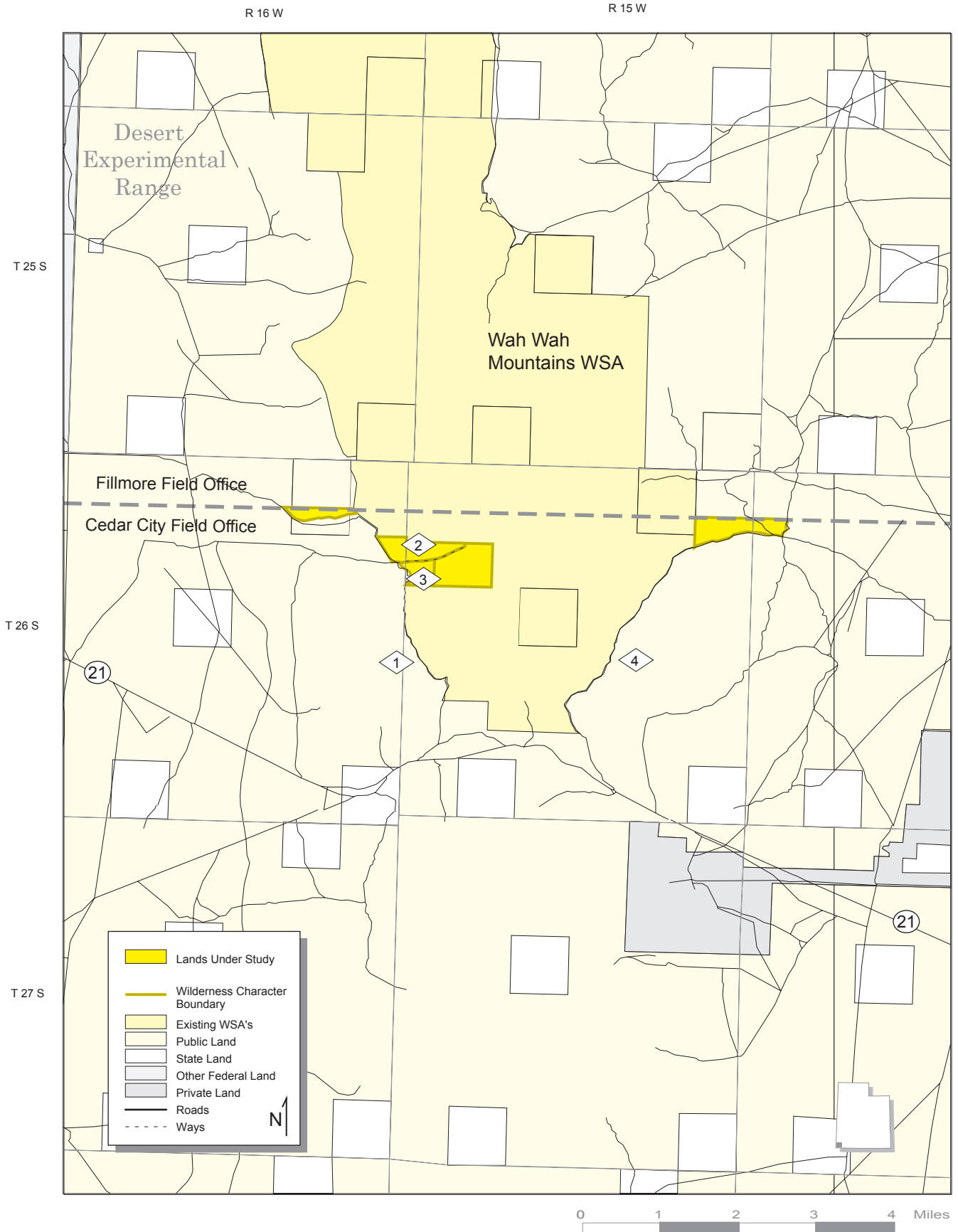
WHITE ROCKS RANGE (Refer to Map 3-5)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM incorrectly identified lands in the area of Ripgut Creek as being state land. The intrusions located here are actually on private land and should not affect the naturalness of the area.	A check of current land status indicates that approximately 476 acres in section 36 in the vicinity of Ripgut Creek is state land. The remaining acreage in the section is public land. The trailers and other intrusions are located primarily on public land.	NO
2	BLM's field work indicates that the bladed and maintained vehicle route ends just before the state line. The cherry-stem should be ended at that point and not further at the state line.	As a result of a SITLA land sale, the state land section that road R4 bisected is now private land. Inventory determinations are no longer valid.	NO
3	The WSA boundary follows a way that is barely visible on the ground past White Rock Cabin into Nevada. The boundary follows this faint way and no other impacts splitting a 9000 foot mountain in half. The area north of this line is natural in character and should be included in the WSA.	As indicated by the full context of this comment, the area referred to is within the state of Nevada and is not part of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
4	The digital data showing the WSA boundary used by BLM does not seem to align with the roads as shown on the 7.5 maps. The boundary should be correctly shown on the maps.	This is a mapping error that has since been corrected.	NO
5	SITLA lands have been included in the inventory. These should be removed from the inventory because BLM does not have	All state lands have been excluded from all of the areas inventoried during the <i>1999 Utah Wilderness Inventory</i> . In this inventory area, the only state section with wilderness character was	NO

WHITE ROCKS RANGE (Refer to Map 3-5)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	administrative authority on these lands.	recently sold to private ownership. Inventory determinations are no longer valid.	

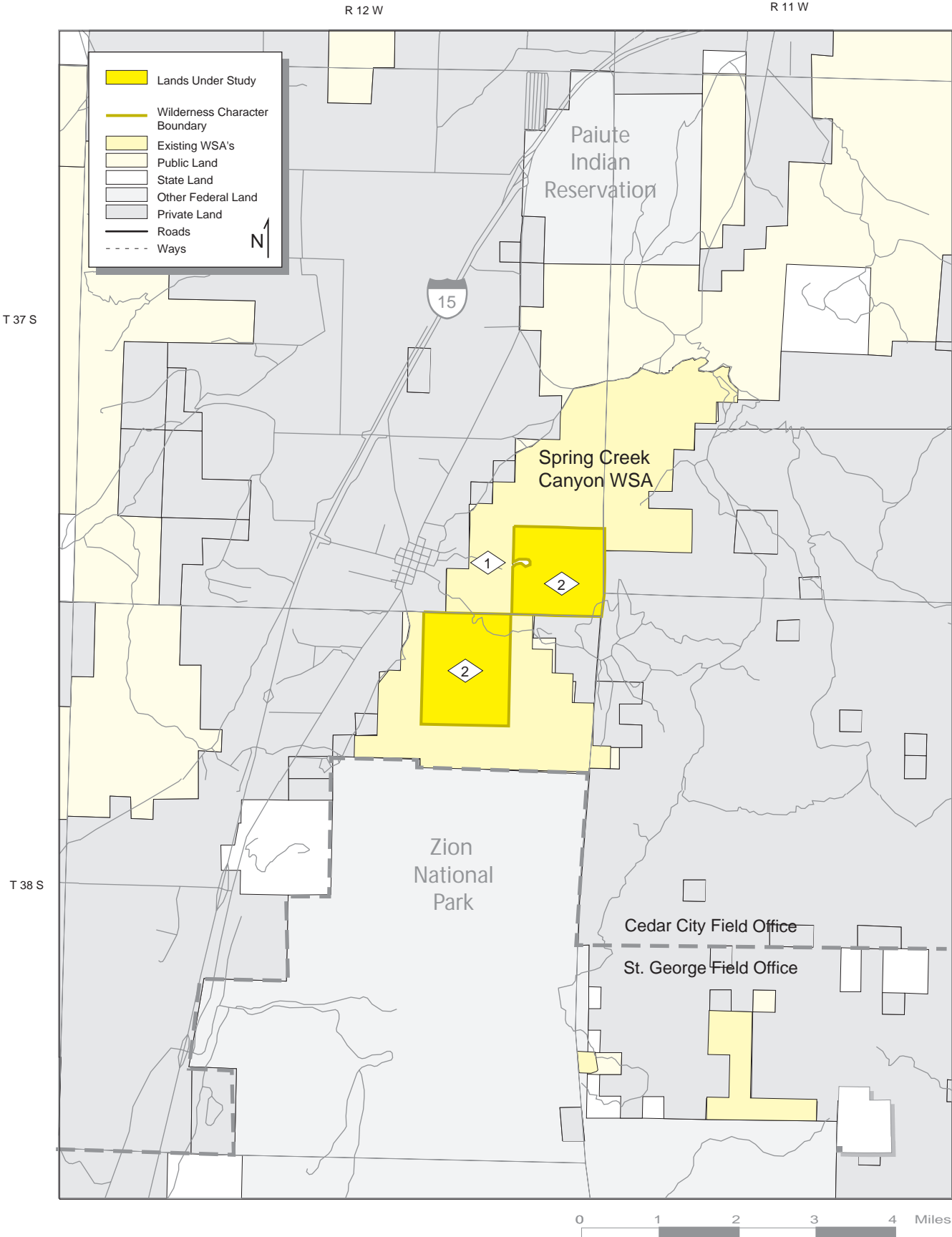




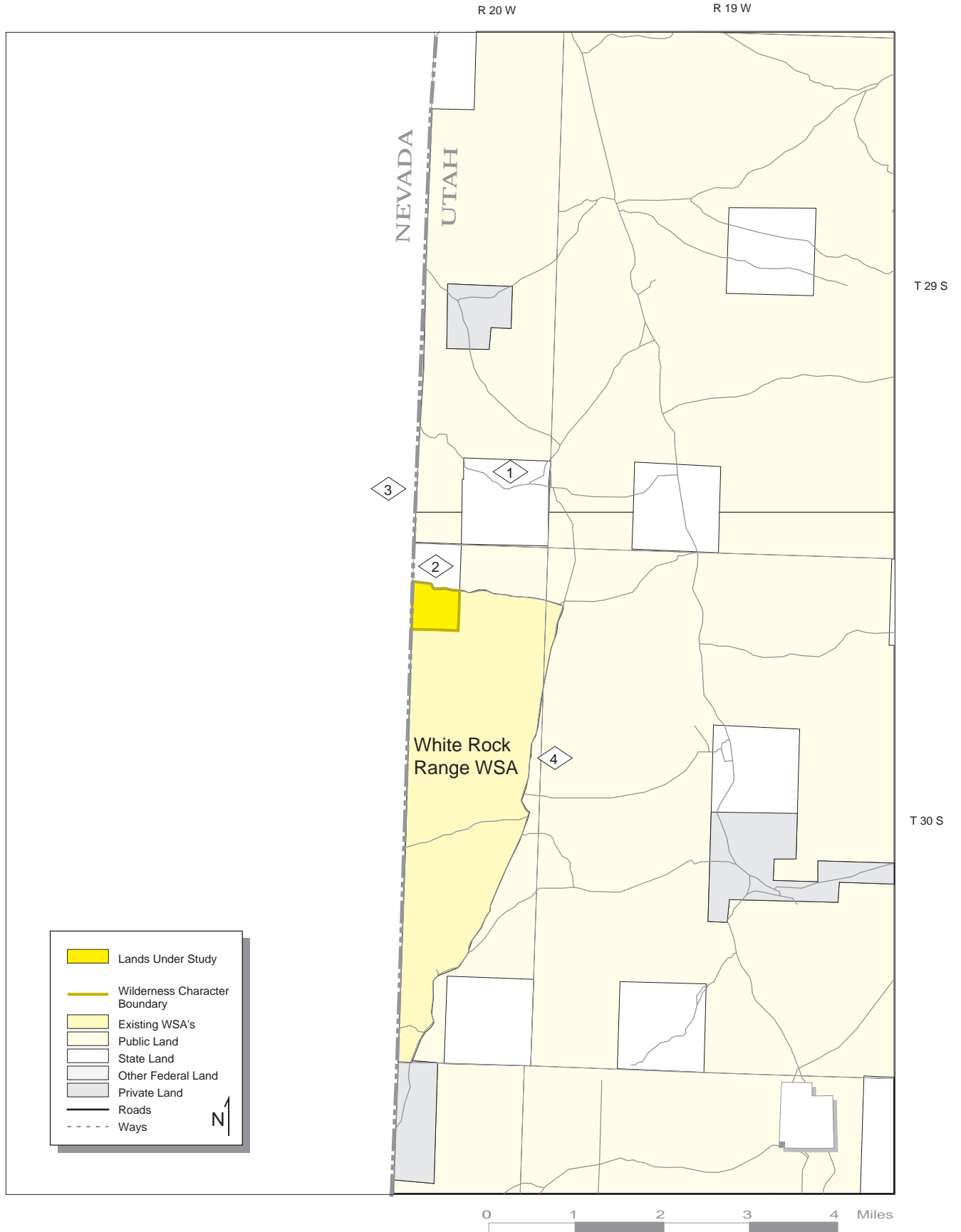
MAP 3.2



MAP 3.3



MAP 3.4



MAP 3.5

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.

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. 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 that has been inventoried and determined to have 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, management, and administrative functions.

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) and as required by Section 603 of the Federal Land Policy and Management Act (FLPMA), 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.