

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

Bureau of Land Management

September 2004

Table of Contents

Section I - Introduction	1
Purpose.....	1
How This Document is Organized.....	1
Background.....	1
Summary of Findings for Lands Administered by the Kanab Field Office Presented in the <i>1999 Utah Wilderness Inventory</i>	3
Section II - Reevaluation of Inventoried Lands	3
Mapping Improvements and Corrections.....	4
Exclusion of State Lands and Contiguous Federal Land Parcels Too Small To Possess Wilderness Character.....	4
West Desert Land Exchange Act of 2000.....	4
Changes in Cherry-stems	5
Changes in Wilderness Character Findings	6
Summary of Changes by Inventory Area.....	7
Canaan Mountain (that portion administered by the Kanab Field Office)	8
Moquith Mountain	8
Orderville Canyon.....	9
Parunuweap Canyon	9
Upper Kanab Creek.....	9
Section III - Inventory Related Scoping Comments and BLM Responses	16
Responses to General Issues, Concerns and Questions Related to the <i>1999 Utah Wilderness Inventory</i>	17
Responses (Inventory Review Results) to Specific Comments By Inventory Area.....	23
Glossary of Terms	35
List of Tables:	
Table 1-1: <i>1999 Utah Wilderness Inventory</i> Findings For the Lands Administered by the Kanab Field Office.....	3
Table 1-2: <i>Utah West Desert Land Exchange of 2000</i> For the Lands Administered by the Kanab Field Office.....	5
Table 2-1: Summary of Changes by Inventory Area	8
Table 2-2: Acreage Summary	16

List of Maps:

Wilderness Character Maps:

Map 2.1 <i>Canaan Mountain (portion admin. by Kanab F.O)</i>	11
Map 2.2 <i>Moquith Mountain</i>	12
Map 2.3 <i>Orderville Canyon</i>	13
Map 2.4 <i>Parunuweap Canyon</i>	14
Map 2.5 <i>Upper Kanab Creek</i>	15

Response to Comments Maps:

Map 3.1 <i>Canaan Mountain (portion admin by Kanab F. O)</i>	28
Map 3.2 <i>Moquith Mountain</i>	29
Map 3.3 <i>Nipple Bench (portion admin. by Kanab F. O)</i>	30
Map 3.4 <i>Orderville Canyon</i>	31
Map 3.5 <i>Parunuweap Canyon</i>	32
Map 3.6 <i>Upper Kanab Creek</i>	33
Map 3.7 <i>Wahweap-Death Ridge (portion admin by Kanab F.O)</i>	34

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 Kanab 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 seven inventory areas on the lands administered by the Kanab 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 88,125 acres were on lands administered by the Kanab 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 Kanab 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 Kanab. Field personnel revisited specifically identified inventory areas, some on several different occasions, to recheck areas and carefully consider the information provided by the public.

Some modifications to boundaries have been made in some 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 Kanab Field Office Presented in the 1999 Utah Wilderness Inventory

On lands administered by the Kanab Field Office, 88,125 acres were inventoried for the presence or absence of wilderness character. Of the inventoried acres, 74,656 were found to possess wilderness character. Lands with wilderness character were found in all seven of the inventory areas.

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

Inventory Area	Public Lands Inventoried (Acres)	Wilderness Character (Acres)
Canaan Mountain*†	4,095	2,526
Moquith Mountain	14,510	11,900
Nipple Bench*	1,858	1,850
Orderville Canyon	5,330	3,220
Parunuweap Canyon	12,090	7,100
Upper Kanab Creek	48,310	46,600
Wahweap-Death Ridge*	1,932	1,460
Total	88,125	74,656

*This acreage reflects only those portions of these inventory areas under the administration of the Kanab Field Office.

†This acreage does not include recently acquired state lands which are being administered under IMP but are not yet officially part of the Wilderness Study Area.

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 Kanab RMP Revision. The refined inventory findings identify lands that have wilderness character in each of the twelve inventory areas.

As a result of these internal and external reviews, adjustments have been made to the inventory in all seven of the inventory areas under consideration in the Kanab 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 Kanab, 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 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 406 acres of BLM lands found in three 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.

Moquith Mountain	122	acres
Orderville Canyon	283	acres
<u>Parunuweap Canyon</u>	<u>1</u>	<u>acre</u>
TOTAL	406	acres

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.”

Acquired lands wholly or partially within 11 wilderness study areas (WSAs) are managed in accordance with the Interim Management Policy for Lands Under Wilderness Review (IMP) for WSAs established under the authority of Section 202 of the *Federal Land Policy and Management Act*. Management of these lands as wilderness or WSAs is automatic, and does not require prior inventory and planning.

Of the 11 wilderness study areas identified in the act, one study area is within the Kanab Field Office and has been affected by this land exchange. Canaan Mountain includes acreage that was also part of the *1999 Utah Wilderness Inventory*. Approximately 631 acres in unit 4 are now currently administered under IMP as dictated by Section 6 of the Act.

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

Inventory Area	Acres of inventoried state lands now within WSA or administered under IMP
Canaan Mountain*	631
Moquith Mountain	0
Nipple Bench*	0
Orderville Canyon	0
Parunuweap Canyon	0
Upper Kanab Creek	0
Wahweap-Death Ridge*	0
Total	631

*This acreage reflects only those portions of the inventory area under the administration of the Kanab 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.

Some inventory findings regarding vehicle route cherry-stems have been modified as a result of public comment and further agency review. In some cases cherry-stems have been added or lengthened. In other cases, cherry-stems have been removed or shortened. Overall, changes to vehicle route cherry-stems have modified the inventory in one area.

All dead-end vehicle routes that meet the BLM road definition used for wilderness inventory purposes have been cherry-stemmed. The Rock Creek Road in the Parunuweap Canyon inventory area is an example of a road cherry-stem. This road provides access from the Oak Flat road and the Shunes Hollow road toward the East Fork Virgin River and The Barracks

topographic formation. 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 and dead-ends on State land at the boundary of the existing Parunuweap Wilderness Study 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 "H" in the Canaan Mountain inventory area is one such example. This route extends from the inventory boundary for 2.4 miles to the boundary of the existing Canaan Mountain WSA, and then continues for another 1.06 miles into the WSA. 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.

Orderville Canyon Three cherry-stems removed.

Upper Kanab Creek One cherry-stem removed.

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 of small parcels (less than 50 acres) of BLM land due to man-made intrusions that 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. A parcel of BLM land has been removed from one inventory area. The paragraph below summarizes this change and reasons for this modification in the affected inventory area.

Orderville Canyon:

Reduction of 286 acres

Approximately 286 acres of unit 1 have been removed from the area with wilderness character because of the sale of state land to private ownership.

A state land sale that was occurring during the inventory has since been finalized. Several parcels of state land have passed to private ownership. A portion of the area initially found to possess wilderness character is now isolated from the rest of the inventory area and the North Fork Virgin River WSA.

Upper Kanab Creek:

Reduction of 425 acres

Approximately 425 acres of the western parcel of this inventory area have been removed from the area found to have wilderness character after correction of mapping errors and the location of a power line right-of-way.

During an examination of the Upper Kanab Creek permanent documentation inventory file, a segment of the southern boundary near Mount Carmel Junction was noted as following a power line right of way. This power line was not fully shown in its relationship to the inventory area boundary. A field evaluation of the power line showed that the line actually crosses the inventory area and has isolated a substantial amount of acreage from the area with wilderness character.

The Elimination of Small Parcels (less than 50 acres) of BLM Lands Due to Man-Made Intrusions.

When the lands were inventoried, 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 and determined to be a substantially noticeable intrusion impacting natural character.

During the scoping process, additional man-made intrusions impacting wilderness character were identified that resulted in slight boundary adjustments to two of the seven inventory areas. In nearly all cases, these changes are the result of the identification of man-made intrusions that existed at the time of initial field inventories, but that were overlooked by inventory teams or imprecisely documented on field inventory maps.

The following is a list of the boundary adjustments made to exclude man-made intrusions that impact wilderness character.

Moquith Mountain Removal of approximately 1.5 acres as the result of mapping error.

Removal of approximately 30 acres for R&PP.

Upper Kanab Creek Removal of approximately 5.5 acres to exclude a large culinary water tank and supporting facilities.

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 “Wilderness Character” maps (Maps 2.1 to 2.5) 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
Canaan Mountain (Refer to Map 2.1)	A. As a result of the West Desert Land Exchange Act of 2000, approximately 631 acres have been excluded from the inventory area and is now administered as part of the Canaan Mountain WSA.

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
Moquith Mountain (Refer to Map 2.2)	A. Approximately 111 acres have been isolated from the area with wilderness character because of the exclusion of state land.
	B. Approximately 1.5 acres have been isolated from the area with wilderness character because of a mapping error that has been corrected. The boundary now follows a vehicle route, isolating the parcel.

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
	C. An R&PP parcel approximately 30 acres in size has been excluded from the area with wilderness character to the city of Kanab for recreational purposes.
	D. Mapping error correction to move Bunting Trailhead.

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
Orderville Canyon (Refer to Map 2.3)	A. Cherry stems have been removed from three substantially noticeable ways. Field Evaluations determined that the ways were not substantially noticeable.
	B. Approximately 283 acres have been isolated from the inventory area because of a state land sale that has changed the ownership to private land.

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
Parunuweap Canyon (Refer to Map 2.4)	A. Approximately 1 acre has been isolated from the area with wilderness character because of the exclusion of state land.

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
Upper Kanab Creek (Refer to Map 2.5)	A. A water tank and associated structures in Red Hollow were initially overlooked during the inventory. The structures provide culinary water to the town of Orderville. The area, approximately 5.5 acres in size has been excluded from the area with wilderness character.
	B. An area approximately 16 acres in size that was initially isolated by a power line and excluded from the area with wilderness character, has been included in the WC area. The power line identified as the boundary was noted as not crossing the inventory area at this site.

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
	C. An area approximately 425 acres in size has been excluded from the area with wilderness character because of a mapping error that did not place a power line ROW in its proper location. The power line excludes this parcel near Mt. Carmel Jct.
	D. A cherry-stem route near Johnson Canyon was determined to be a way. The cherry-stem has been removed.
	E. The boundary has been adjusted along an access road to a radio and microwave tower to correct a mapping error.

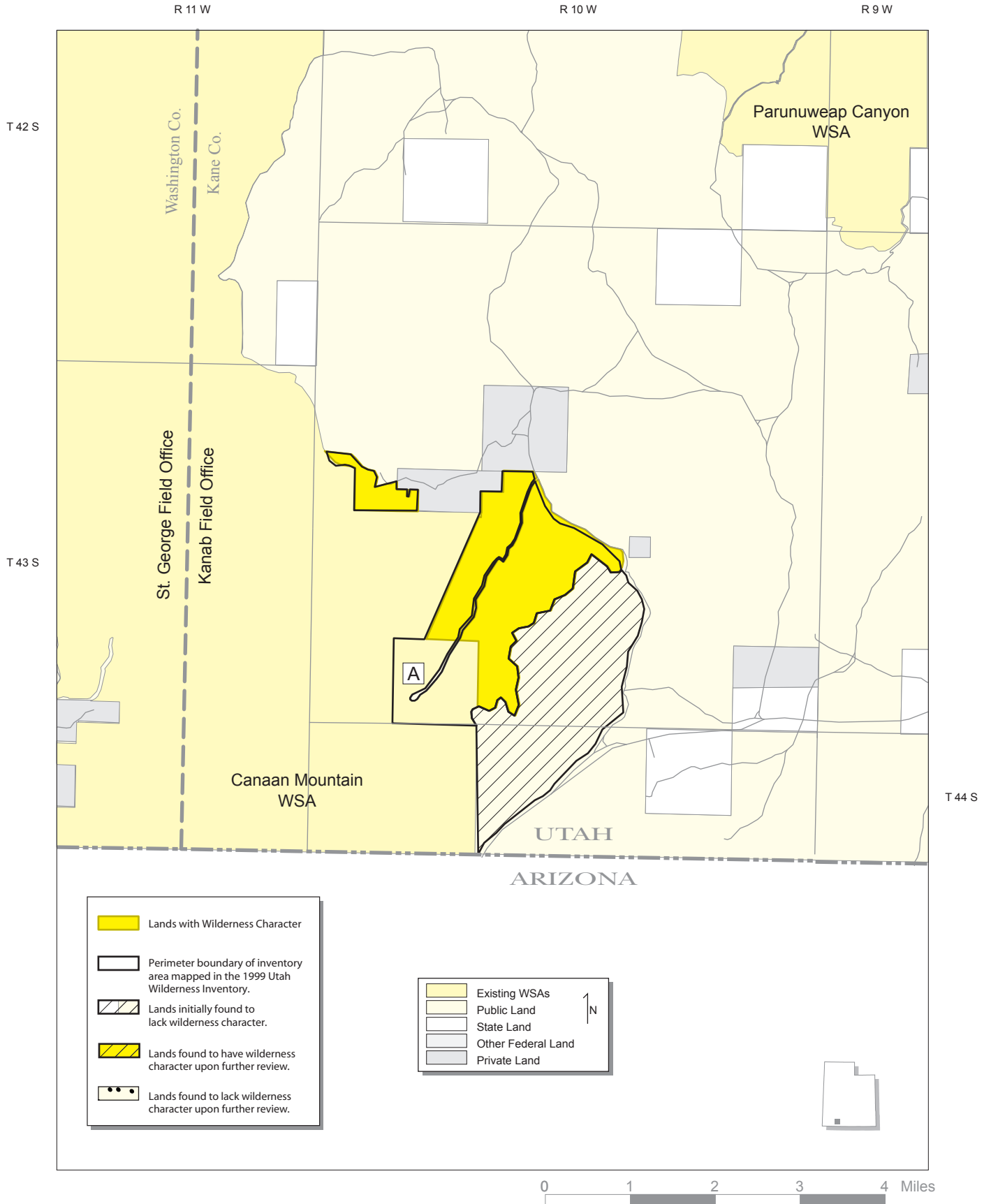
No modifications to the areas with wilderness character were made to the following two inventory areas except for the exclusion of state lands:

Nipple Bench (those parcels under the administration of the Kanab Field Office),

Wahweap-Death Ridge (those parcels under the administration of the Kanab Field Office)

Canaan Mountain

Wilderness Character Modifications

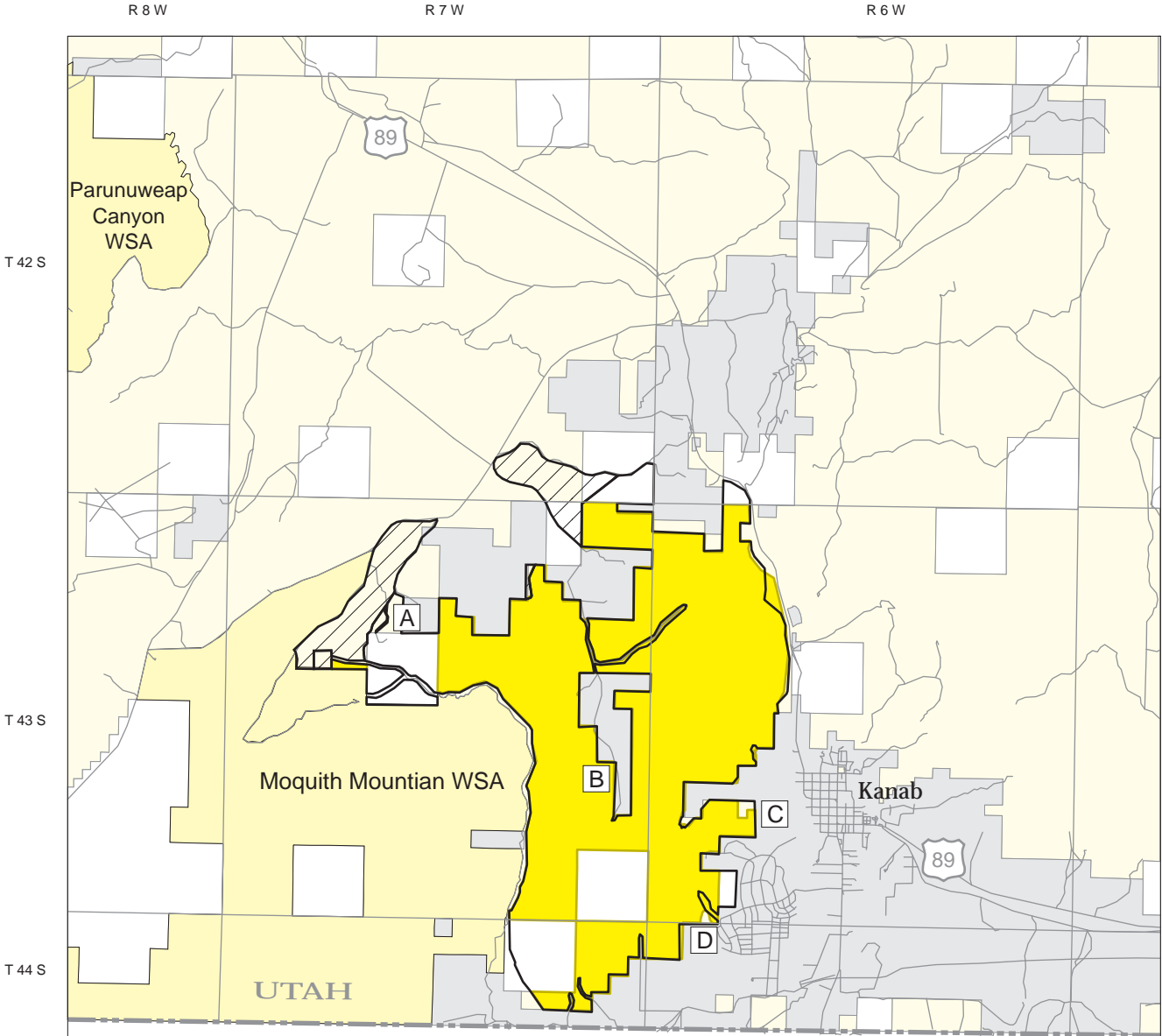


	Lands with Wilderness Character
	Perimeter boundary of inventory area mapped in the 1999 Utah Wilderness Inventory.
	Lands initially found to lack wilderness character.
	Lands found to have wilderness character upon further review.
	Lands found to lack wilderness character upon further review.

	Existing WSAs
	Public Land
	State Land
	Other Federal Land
	Private Land

1 N

MAP 2.1



UTAH
ARIZONA

- Lands with Wilderness Character
- Perimeter boundary of inventory area mapped in the 1999 Utah Wilderness Inventory.
- Lands initially found to lack wilderness character.
- Lands found to have wilderness character upon further review.
- Lands found to lack wilderness character upon further review.

- Existing WSAs
- Public Land
- State Land
- Other Federal Land
- Private Land

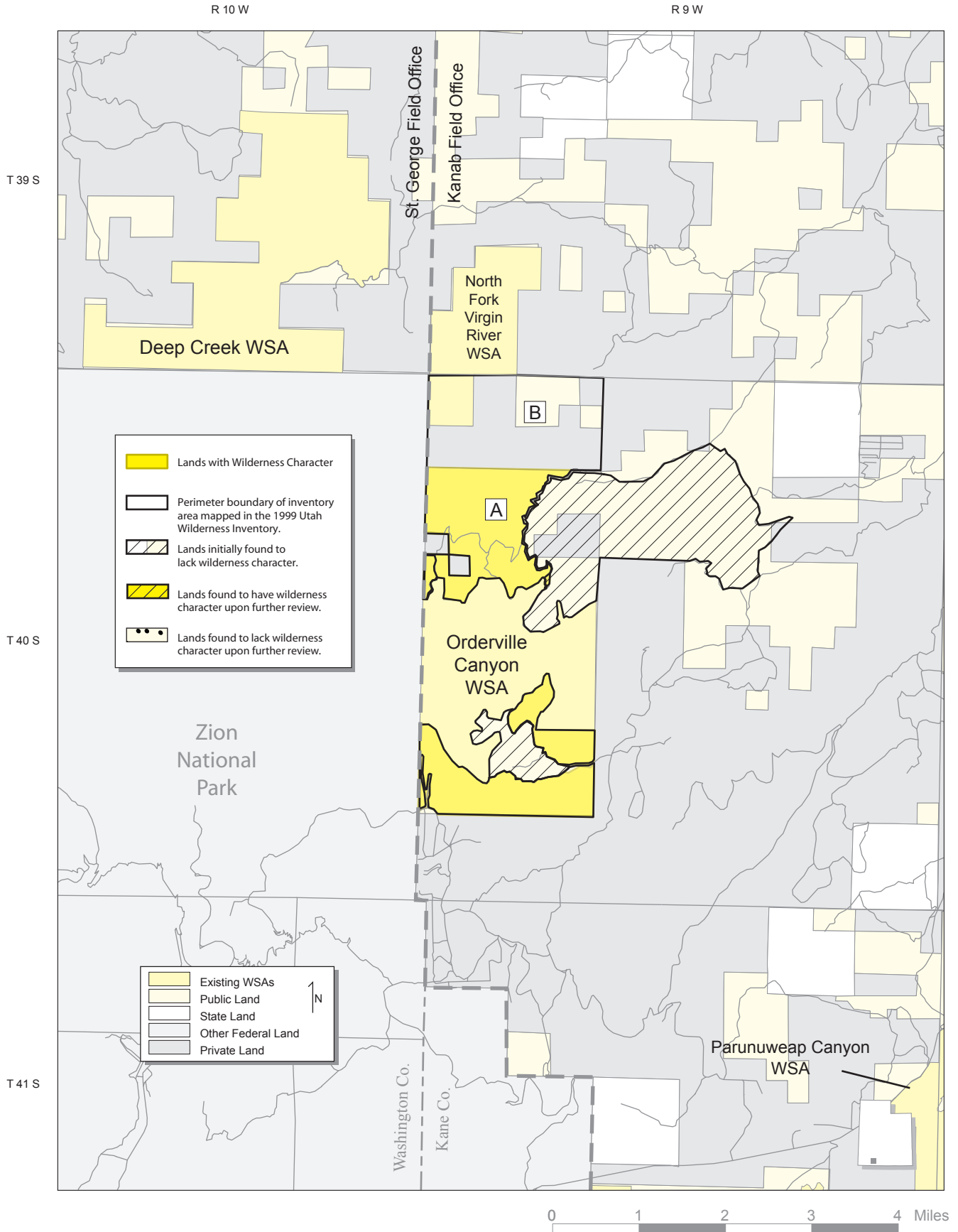
1
N



MAP 2.2

Orderville Canyon

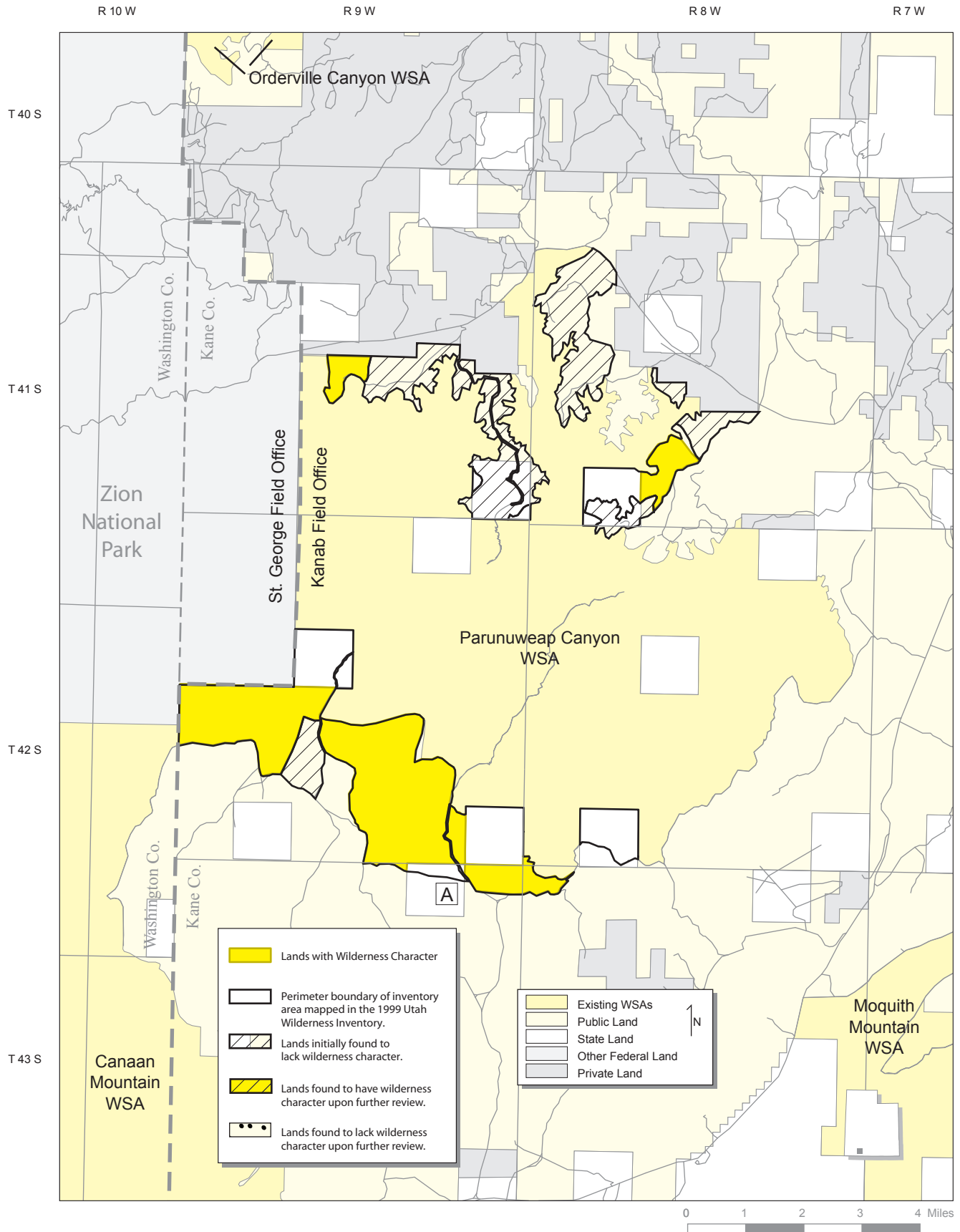
Wilderness Character Modifications



MAP 2.3

Parunuweap Canyon

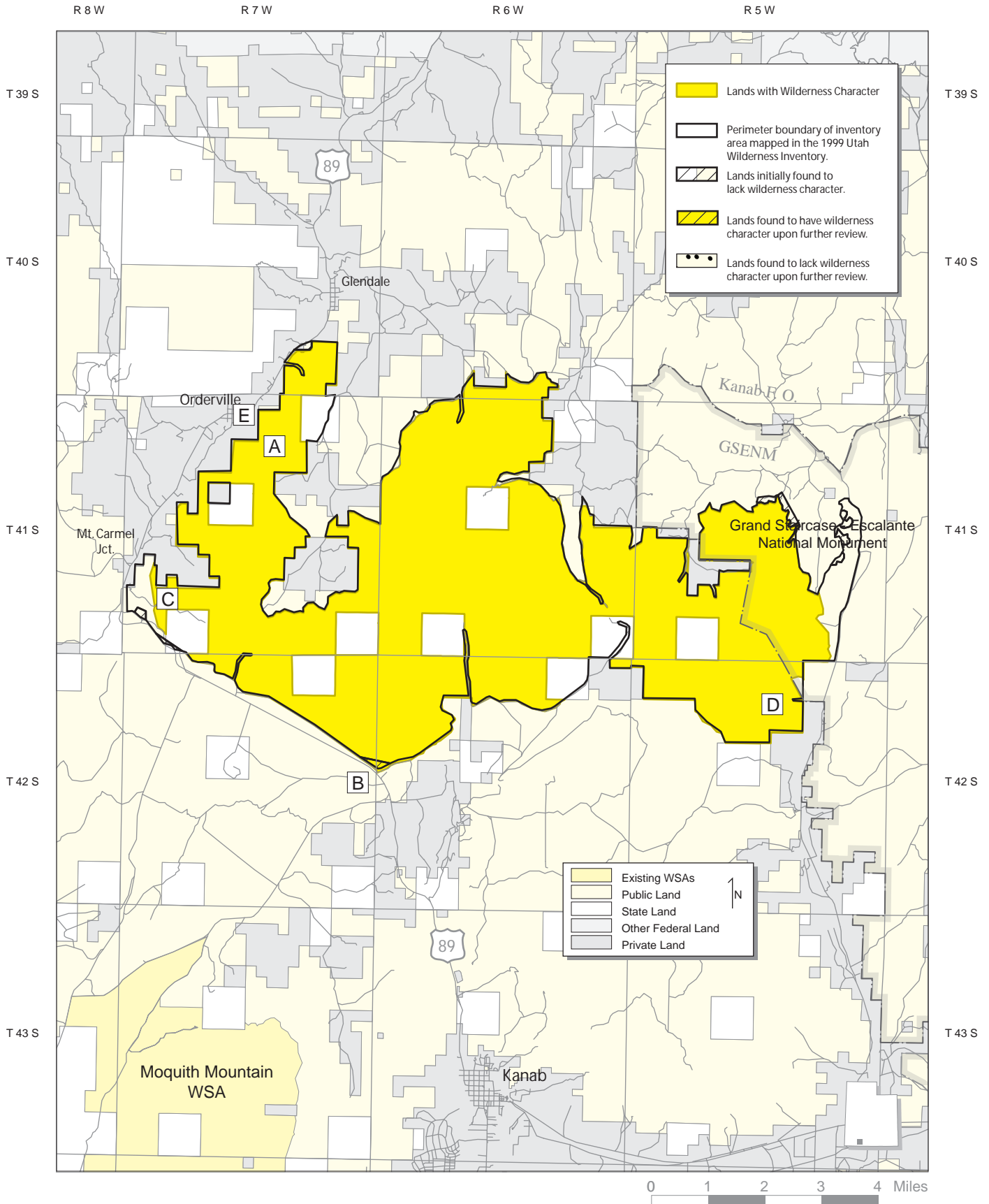
Wilderness Character Modifications



MAP 2.4

Upper Kanab Creek

Wilderness Character Modifications



MAP 2.5

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
Canaan Mountain*†	2,526	1,895
Moquith Mountain	11,900	10,781
Nipple Bench*	1,850	0
Orderville Canyon	3,220	1,340
Parunuweap Canyon	7,100	5,454
Upper Kanab Creek	46,600	41,030
Wahweap-Death Ridge*	1,460	0
Total	74,656	60,500

*This acreage reflects only those parcels of these inventory areas under the administration of the Kanab Field Office.

†This acreage does not include recently acquired state lands which are being administered under IMP but are not yet officially part of the Wilderness Study Area.

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 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 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 untrammled 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 un-maintained 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 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 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 seven inventory areas in the Kanab 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 3.6). 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.

CANAAN MOUNTAIN* (Refer to Map 3-1)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM has cherry-stemmed a route that was not constructed, maintained or receives regular and continuous use. The cherry-stem should be removed.	After a field evaluation, Way “H” which was not constructed or maintained but does receive regular and continuous use was reexamined and determined to be a substantially noticeable way. The cherry-stem has been retained.	NO
2	BLM uses an elevation line as the boundary excluding an area with natural character. The natural area to the southeast should be included in the WSA.	The area southeast of the 8600 foot contour line is cumulatively impacted by campsites, 5.6 miles of ways, a telephone ROW, woodcutting and extensive OHV/ATV use.	NO

***Additional public comments received concerning the Canaan Mountain WIA refer to sites located outside of the area administered by the Kanab Field Office and are not listed here. Responses to these comments can be viewed in the Canaan Mountain WIA Revision File for the St. George Field Office.**

MOQUITH MOUNTAIN (Refer to Map 3-2)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM boundary uses a section line and excludes an area that is free of any significant impacts. The boundary should be adjusted to include the natural area.	The area beyond the section line contains several impacts including: a 40-acre power & water withdrawal, a powerline ROW; seven substantially noticeable ways and OHV trails totaling 2.2 miles; a corral and fenceline; a motorized camping area and an OHV play area which is contiguous to the Coral Pink Sand Dunes State Park.	NO
2	BLM failed to inventory the state sections. These areas are free of any significant impacts.	The state land sections are outside BLM administration and have been excluded from the inventory areas.	NO
3	The inventory area includes Indian Canyon which contains a pipeline and other facilities supporting culinary water for Fredonia, Arizona. This area should be excluded from the inventory area	The area at the head of Indian Canyon which contains the spring source for the Fredonia water system is not in the area with wilderness character. The pipeline and access road (BLM_I) together have been cherry-stemmed from the inventory unit. The cherry-stem is of sufficient	NO

MOQUITH MOUNTAIN (Refer to Map 3-2)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	so the water systems can be maintained and upgraded when necessary.	size to allow for maintenance of the line.	

NIPPLE BENCH**(Refer to Map 3-3)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM uses section lines as the boundaries and excludes an area that is free of any significant impacts. The boundary should be adjusted to include this 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

****Additional public comments received concerning the Nipple Bench WIA refer to sites located outside of the area administered by the Kanab Field Office. Responses to these comments can be viewed in the Revision Files for the Grand Staircase Escalante National Monument.**

ORDERVILLE CANYON (Refer to Map 3-4)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM has not inventoried recently acquired lands that include some of the North Fork Virgin River riparian areas; a cherry-stem could remove an old cabin and vehicle access route.	This area was in private ownership at the time of the 1999 inventory and was not inventoried. The 1999 inventory has since been completed and assessment of these lands for wilderness character would require a new inventory.	NO
2	BLM has excluded this area because of a potential state land sale. The western boundary way is no longer passable and the boundary should be expanded.	This area is part of Unit 2 which contains approximately 3.5 miles of vehicle ways, some of which are substantively intrusive. A proposed state land sale (which has since been consummated) was also taken into consideration and a determination was made that the sale and intrusive impacts were cumulatively significant. The western boundary is the existing WSA boundary	NO
3	All of BLM's cherry stems are around extremely faint ways which are very well reclaimed. They show no maintenance or use, they are clearly not significant impacts and should not be cherry stemmed.	Upon a field evaluation, the cherry-stems on routes "F", "H" and "I" were reexamined and determined to be ways. All three routes showed limited use and access because of the effects of natural rehabilitation. The cherry-stems have been removed.	YES (See "A" on Map 3-4)
4	BLM incorrectly excluded this area. Impacts from a previous select tree cutting are almost gone. The vehicle routes are badly	Ways "W", "X", "Y" and "Z" and other associated routes branching from these ways criss-cross the northern part of unit 6 for approximately 2.2 miles. These ways and routes were	NO

ORDERVILLE CANYON (Refer to Map 3-4)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	eroded and passable only to ATVs or on foot. They do not qualify as roads and should not be cherry-stemmed.	considered to be cumulative impacts that detract from the naturalness of the area. None of these routes or ways is cherry-stemmed. Way "U" does not meet the BLM road definition but is highly visible and is determined to be a substantially noticeable way. The way is the boundary separating lands with wilderness character in unit 5 from the area with no wilderness character in unit 6.	

PARUNUWEAP CANYON(Refer to Map 3-5)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	This area was found to have no wilderness character. The only impact to this area is the faint vehicle way which forms the boundary. The ownership shows this area to be private, this area was acquired by BLM and is public land and should be included in the WSA.	While not substantially noticeable, Way "O" is quite visible and receives regular and continuous use. The way is the most reasonable boundary in this area. Land status maps used during the inventory showed this area to be public land administered by BLM.	NO
2	The only significant impacts are occurring from car camping along the main road. ATV permittees are pioneering routes into section 36. The inventory should include the cliffs and plateaus to the east.	The cherry stem that exits from section 36 is part of the existing WSA. The state land in section 36 is outside the scope of the H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
3	BLM identified impacts of wood cutting, deer camps, OHV travel, grazing, vegetation chaining and mineral exploration are not all significant. By excluding a small area off the highway, the majority of the remaining acreage is natural and should be part of the area with wilderness character.	An examination of the Inventory Files identified numerous fuel wood gathering routes throughout the majority of the southern half of unit 2. These routes, along with associated impacts with wood cutting activity, pose a substantially cumulative impact on the naturalness of the area. As a result the area was found not to be natural in character.	NO
4	BLM did not inventory this area, impacts are not significant. There are several very old ways which are eroded. This area is even more natural than the area BLM inventoried just to the north. This area should be included in the WSA.	The boundary of unit 2 is set along way "X" which was constructed and receives regular and continuous use. The way is not maintained but was determined to be a substantially noticeable way. Because of this, further inventory activity beyond the way was halted.	NO
5	BLM did not inventory this area. Only one significant route is in this area that can be cherry-stemmed and the rest of the area is	This area is outside the boundary of the previous H.R. 1500 legislative boundary that was the focus of the 1999 Utah Wilderness Inventory..	NO

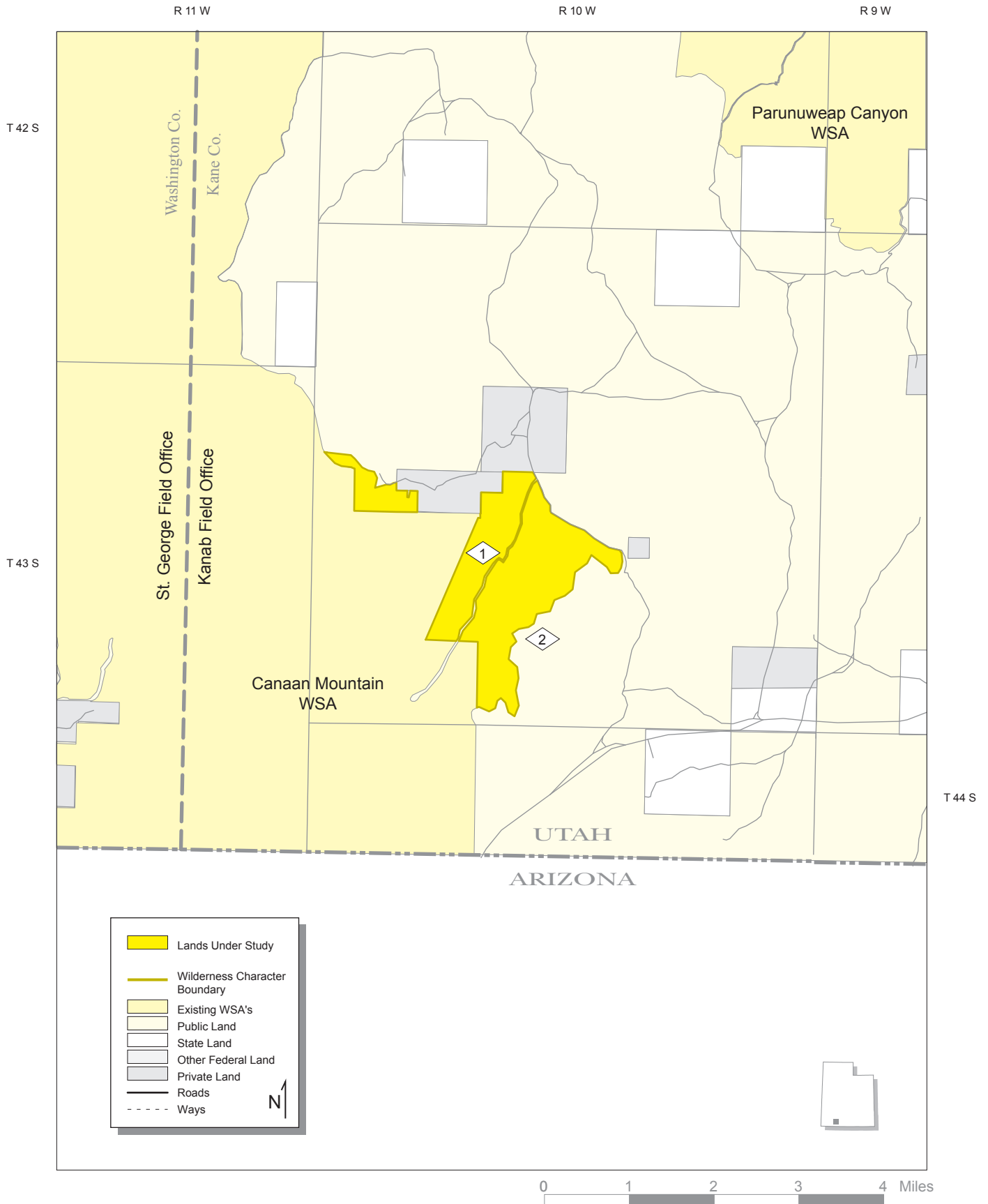
PARUNUWEAP CANYON(Refer to Map 3-5)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	natural and includes a segment of the Virgin River canyon.		
6	The area on the north side of the canyon was not inventoried; it is natural with minimal impacts. The area includes a prehistoric rock structure and should be included within the unit.	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
7	A parcel of private land is shown within the inventory area. It should be removed.	This was a mapping error that has since been corrected.	(YES See A on Map 3-5)

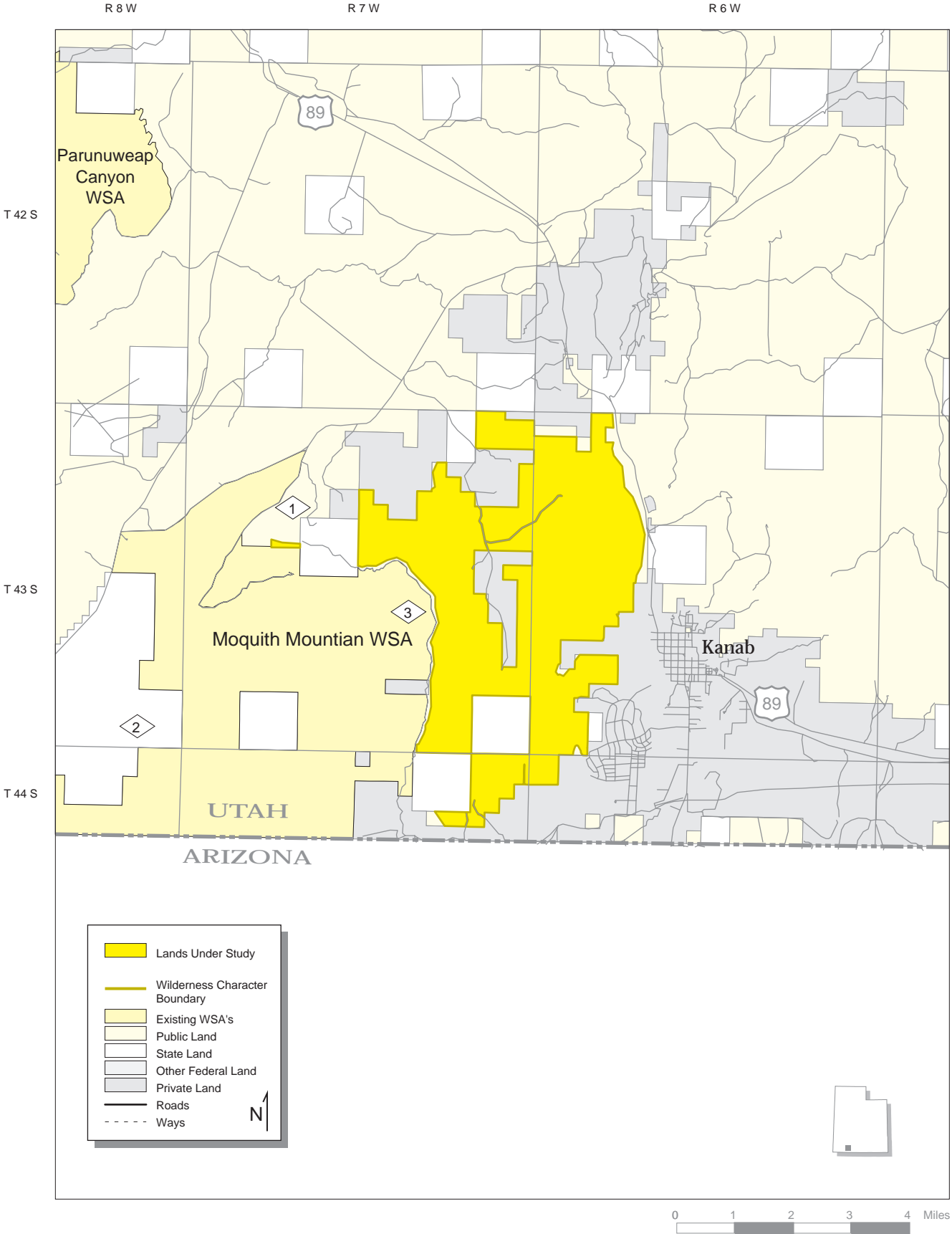
UPPER KANAB CREEK (Refer to Map 3-6)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASELINE CHANGES
1	BLM incorrectly cherry-stemmed a route that is not a significant impact.	Way "Bb" was identified as having been constructed and bladed at one time, 4 vehicles were noted using the route at the time of the 1996 inventory.	NO
2	Route AE was incorrectly cherry-stemmed by BLM; the route is a faint way and not significant because it shows no evidence of mechanical maintenance.	Way "AE" was identified as a non-substantial way and was not intended to be cherry-stemmed. This is a mapping error that has been corrected.	NO
3	BLM does not complete an accurate inventory on the entire roadless area. The area south of the imprecise boundary is free of any significant impacts.	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
4	Route "AN" was incorrectly cherry-stemmed by BLM, the route is very faint and not significant.	Way "AN" is not shown as a cherry-stem on the wilderness character map. The route was determined to be a fenceline maintenance way.	NO
5	BLM has used as the boundary of unit an insignificant way, the unit should be expanded to include natural areas beyond.	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
6	BLM incorrectly cherry-stems a route identified in the BLM file as "probably not cherry-stem", the route is both insignificant and nor mechanically maintained. The cherry-stem should be removed.	This route is identified on the inventory wilderness character map as a "low grade way". The route has not been cherry-stemmed.	NO
7	BLM fails to complete inventory of roadless area. This area is free of any significant impacts and UWC cherry-stemmed the only significant route in the 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
8	It appears the BLM is unaware of the radio tower and access route. These impacts should be cherry-	The wilderness character map in the inventory file indicates the access route and radio tower were excluded from the area with wilderness character.	NO

UPPER KANAB CREEK (Refer to Map 3-6)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	BASELINE CHANGES
	stemmed from the unit.		
9	BLM appears to have included some Glendale city streets in the inventory area. They should be excluded.	A check of the inventory files and current land ownership indicate that no streets from adjacent towns were included in the area with wilderness character.	NO
10	BLM has included roads, fences and a water tank in the Red Hollow area. These should be removed from the inventory area.	Upon a field evaluation, the area in Red Hollow was evaluated and approximately 5.5 acres around and including the water tank was removed from the area with wilderness character.	YES (See "A" on Map 3-6)
11	The areas below the Elkheart Cliffs east of Orderville are within the annexation maps of Orderville and Glendale. They should be removed from the inventory area.	The current land status maps indicate that only those parcels of public land along the Elkheart Cliffs are included in the inventory area.	NO

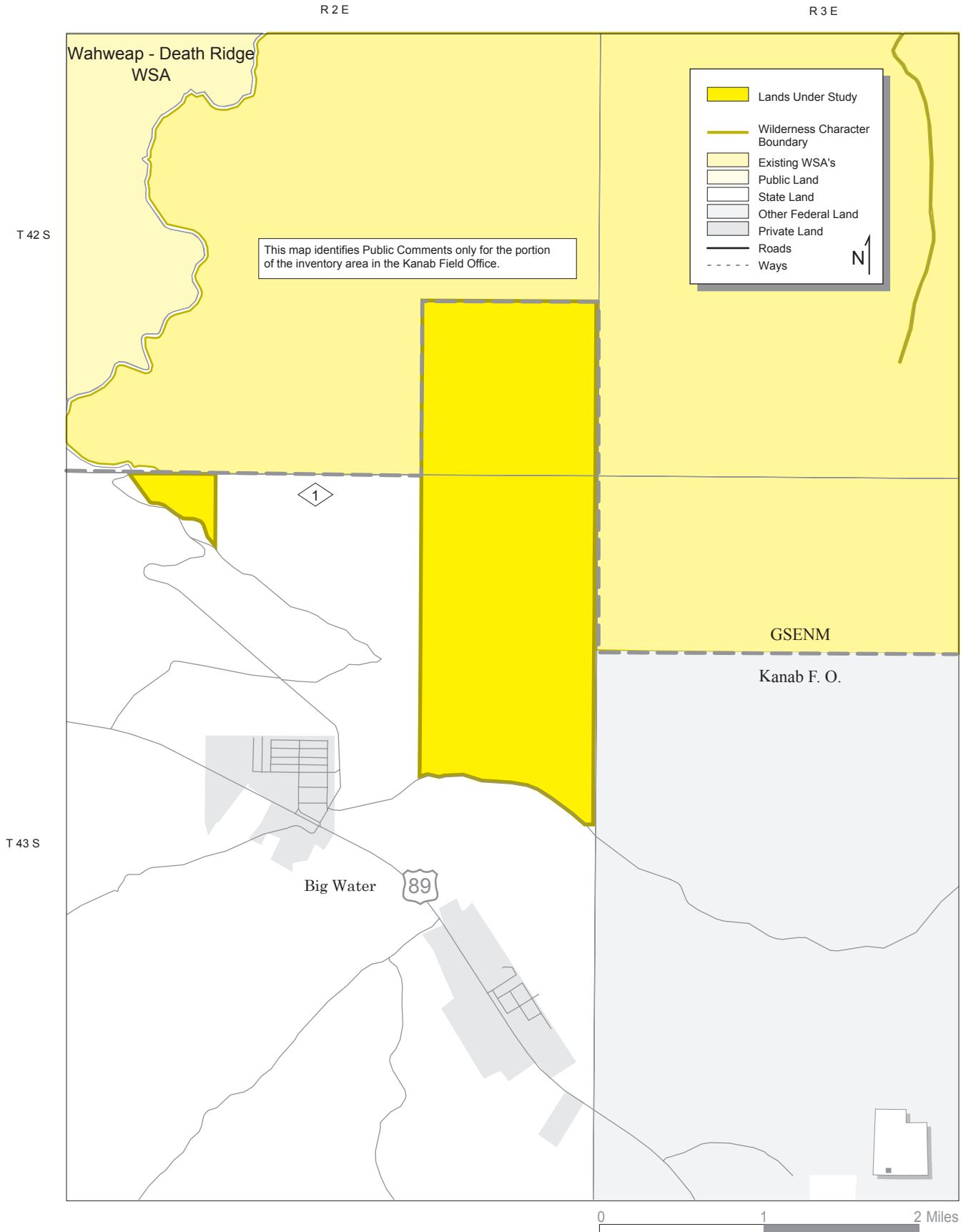
WAHWEAP-DEATH RIDGE**(Refer to Map 3-7)			
#	PUBLIC COMMENTS	BLM RESPONSE-INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Part of unit 13 is on state land and should be removed from the inventory area.	This area is on state land and has been excluded from the area with wilderness character.	YES (See "A" on Map 3.7)
2	The gravel pit along the road from Church Wells is no longer used but it is significant and the pit along with the land around it should be removed from the inventory.	A review of the file and inventory maps indicate that the gravel pit has been excluded from the area with wilderness character.	NO

****Additional public comments received concerning the Wahweap-Death Ridge WIA refers to sites located outside of the area administered by the Kanab Field Office. Responses to these comments can be viewed in the Revision Files for the Grand Staircase Escalante National Monument.**

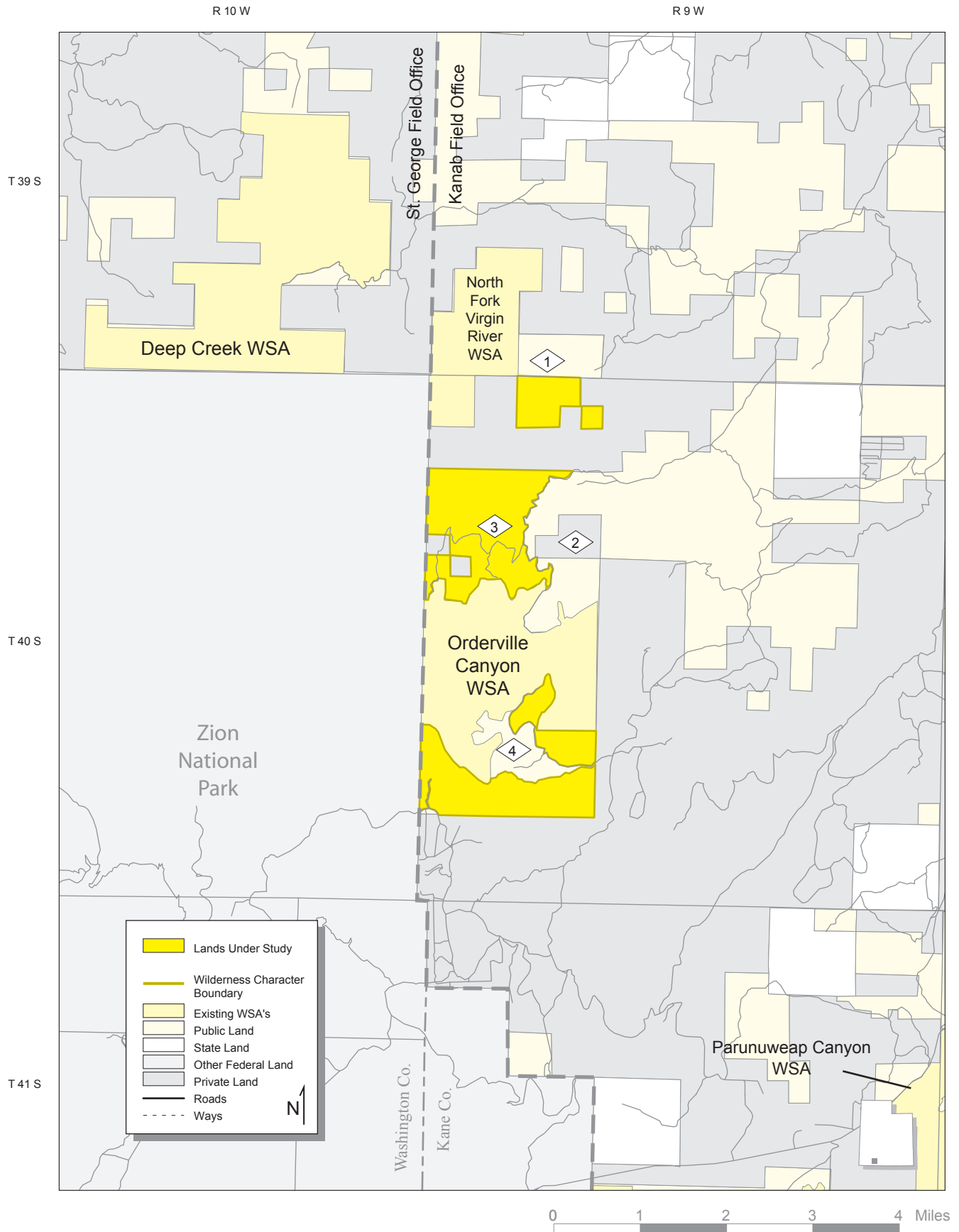




MAP 3.2



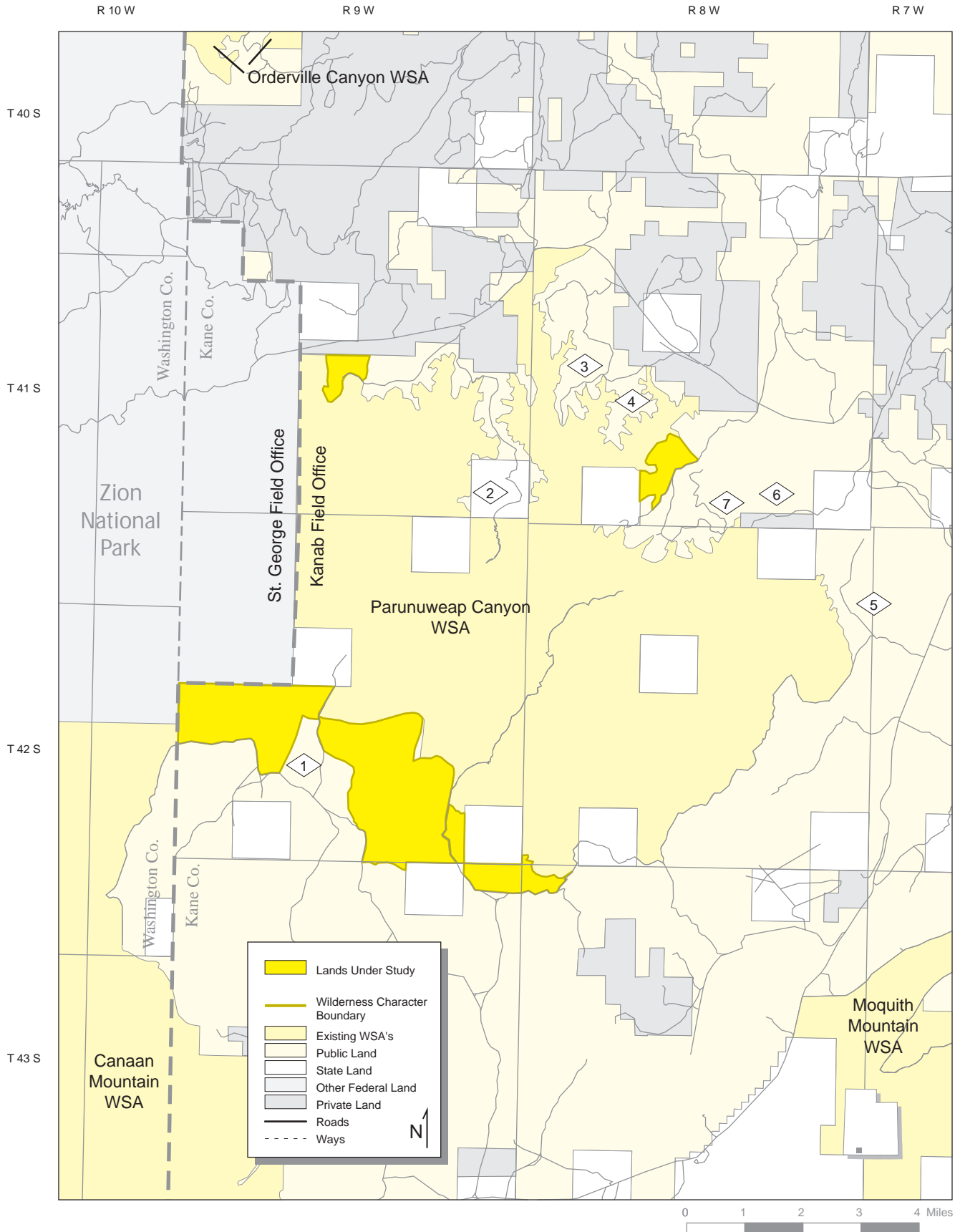
MAP 3.3



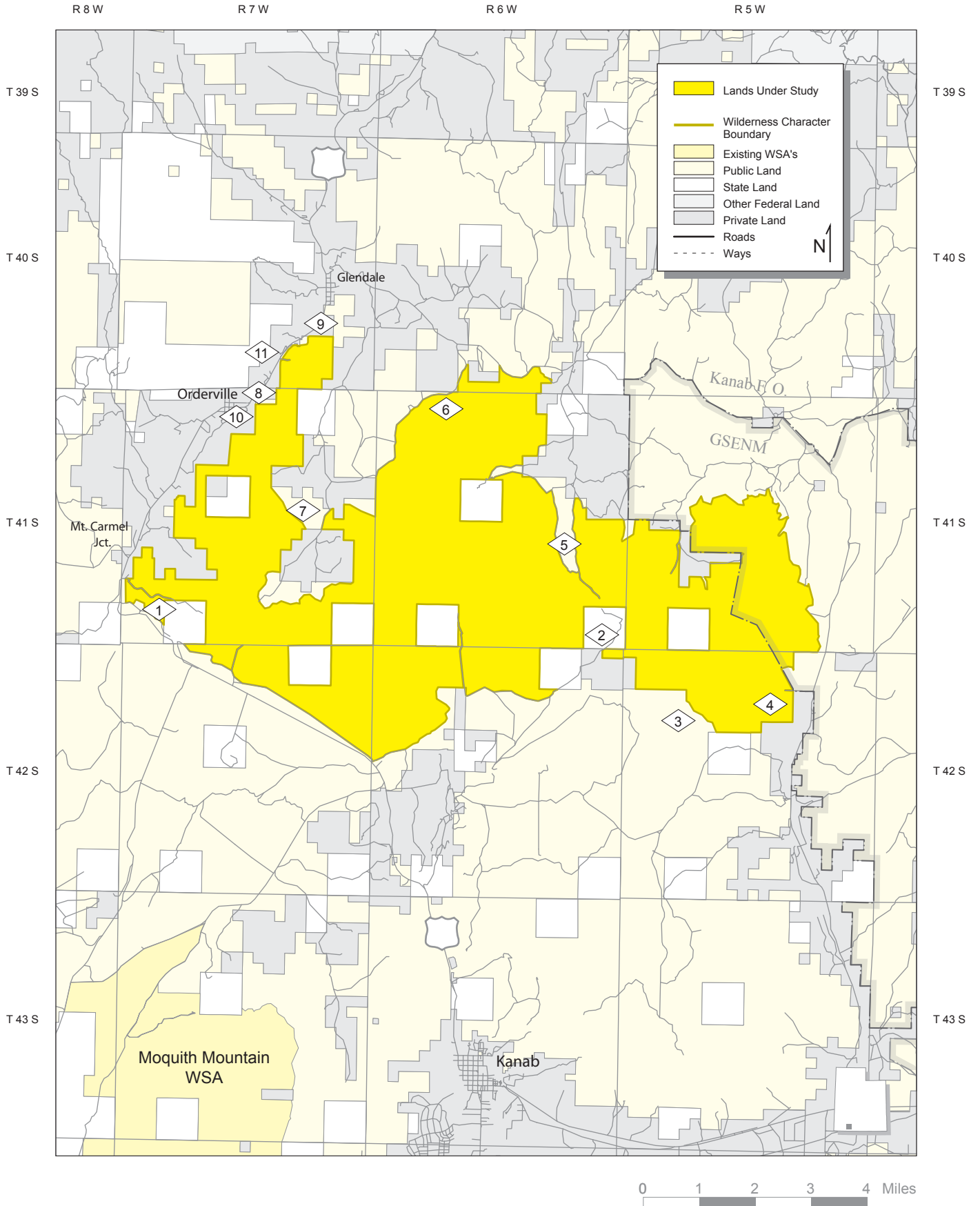
MAP 3.4

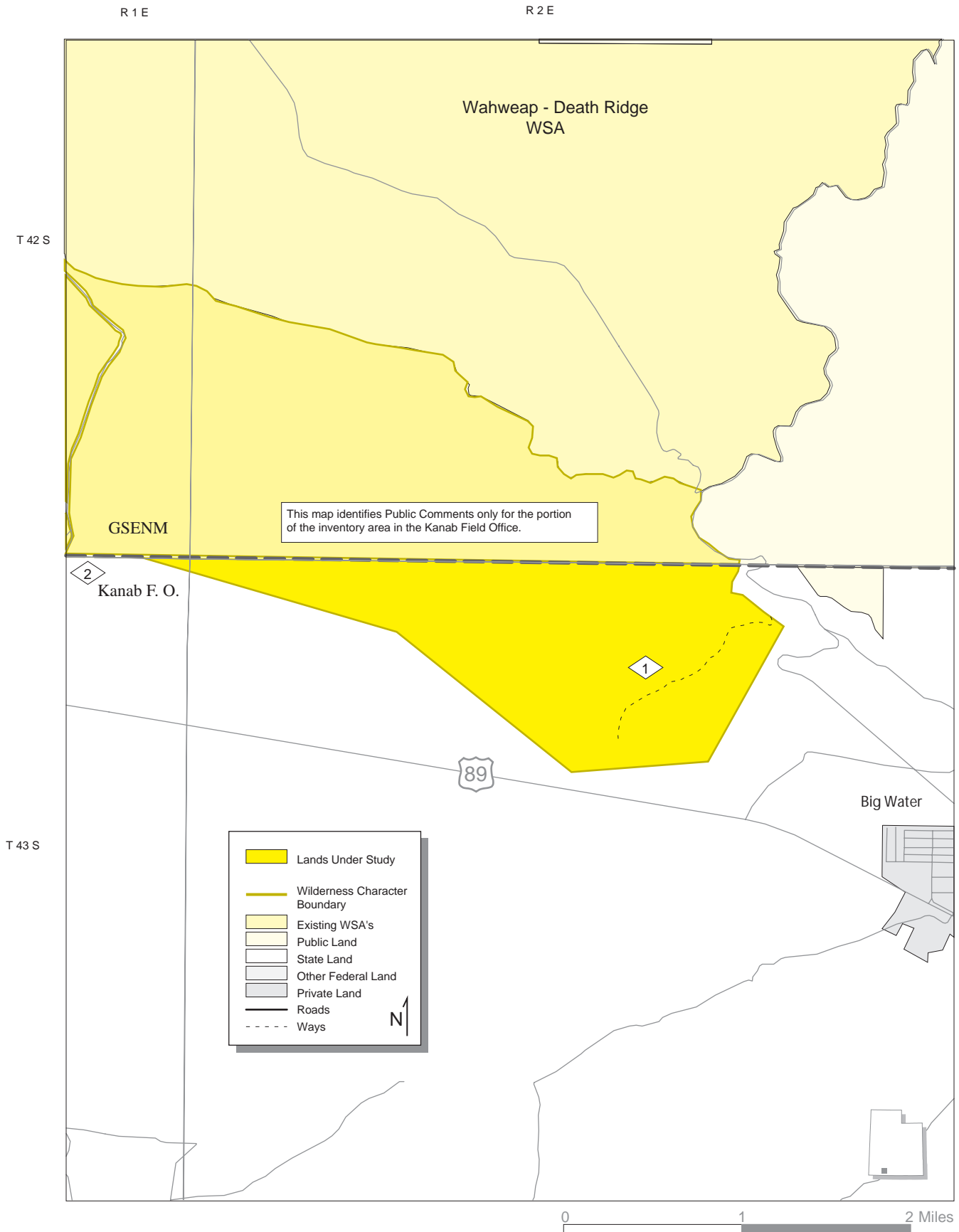
Parunuweap Canyon

Response to Comments



MAP 3.5





MAP 3.7

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.