

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

**Bureau of Land Management**

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## Table of Contents

|  |    |
|--|----|
| <b>Section I - Introduction</b> .....  | 1  |
| Purpose .....  | 1  |
| How This Document is Organized .....   | 1  |
| Background .....   | 2  |
| Evaluation of Wilderness Character .....   | 4  |
| Summary of Findings for Lands Administered by the Richfield Field Office<br>Presented in the <i>1999 Utah Wilderness Inventory</i> ..... | 5  |
| <b>Section II - Reevaluation of Inventoried Lands as a Result of Initial Statewide Scoping</b> ...                                       | 7  |
| Mapping Improvements and Corrections .....   | 7  |
| Exclusion of State Lands and Contiguous Federal Land Parcels<br>Too Small for WSA Consideration .....                                    | 7  |
| Changes in Cherry-stems .....  | 8  |
| Changes in Wilderness Character Findings .....   | 9  |
| Summary of Changes by Inventory Area .....   | 14 |
| <b>Section III - Inventory-Related Scoping Comments and BLM Responses</b> .....  | 38 |
| Responses to General Issues, Concerns, and Questions<br>Related to the <i>1999 Utah Wilderness Inventory</i> .....                       | 38 |
| Responses (Inventory Review Results) to Specific Comments By Inventory Area .....  | 47 |
| Bull Mountain .....  | 47 |
| Bullfrog Creek .....   | 47 |
| Dirty Devil-French Spring .....  | 48 |
| Dogwater Creek .....   | 50 |
| Fiddler Butte .....  | 50 |
| Fremont Gorge .....  | 51 |
| Horseshoe Canyon South .....   | 52 |
| Jones Bench .....  | 52 |
| Limestone Cliffs .....   | 53 |
| Little Rockies .....   | 54 |
| Mount Ellen-Blue Hills .....   | 54 |
| Mount Hillers .....  | 55 |
| Mount Pennell .....  | 55 |
| Muddy Creek-Crack Canyon .....   | 56 |
| Notom Bench .....  | 56 |
| Ragged Mountain .....  | 56 |
| Red Desert .....   | 57 |
| Wild Horse Mesa .....  | 58 |
| <b>Glossary of Terms</b> .....   | 77 |

**List of Tables:**

Table 1-1: *1999 Utah Wilderness Inventory Findings*  
For the Lands Administered by the Richfield Field Office ..... 6

Table 2-1: Summary of Changes by Inventory Area ..... 15

Table 2-2: Acreage Summary ..... 37

**List of Maps:**

Baseline Modifications Maps:

Map 2.1 *Bull Mountain* ..... 20

Map 2.2 *Bullfrog Creek* ..... 21

Map 2.3 *Dirty Devil-French Spring* ..... 22

Map 2.4 *Dogwater Creek* ..... 23

Map 2.5 *Fiddler Butte* ..... 24

Map 2.6 *Fremont Gorge* ..... 25

Map 2.7 *Horseshoe Canyon South* ..... 26

Map 2.8 *Limestone Cliffs* ..... 27

Map 2.9 *Little Rockies* ..... 28

Map 2.10 *Mount Ellen-Blue Hills* ..... 29

Map 2.11 *Mount Hillers* ..... 30

Map 2.12 *Mount Pennell* ..... 31

Map 2.13 *Muddy Creek-Crack Canyon* ..... 32

Map 2.14 *Notom Bench* ..... 33

Map 2.15 *Ragged Mountain* ..... 34

Map 2.16 *Red Desert* ..... 35

Map 2.17 *Wild Horse Mesa* ..... 36

Response to Comments Maps:

Map 3.1 *Bull Mountain* ..... 59

Map 3.2 *Bullfrog Creek* ..... 60

Map 3.3 *Dirty Devil-French Spring* ..... 61

Map 3.4 *Dogwater Creek* ..... 62

Map 3.5 *Fiddler Butte* ..... 63

Map 3.6 *Fremont Gorge* ..... 64

Map 3.7 *Horseshoe Canyon South* ..... 65

Map 3.8 *Jones Bench* ..... 66

Map 3.9 *Limestone Cliffs* ..... 67

Map 3.10 *Little Rockies* ..... 68

Map 3.11 *Mount Ellen-Blue Hills* ..... 69

Map 3.12 *Mount Hillers* ..... 70

Map 3.13 *Mount Pennell* ..... 71

Map 3.14 *Muddy Creek-Crack Canyon* ..... 72

Map 3.15 *Notom Bench* ..... 73

Map 3.16 *Ragged Mountain* ..... 74

Map 3.17 *Red Desert* ..... 75

Map 3.18 *Wild Horse Mesa* ..... 76

## **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 Richfield Field Office in east central Utah. Public lands with wilderness character, as identified in the inventory and the revisions described in this document, are the subject of study in the Richfield Resource Management Plan (RMP) Revision. This document also addresses questions and concerns that were raised during the initial scoping phase of the statewide wilderness study area (WSA) planning project that began in March of 1999.

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

### **How This Document Is Organized**

This document is organized in three sections:

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

Section II outlines all of the changes that have been made to the *1999 Utah Wilderness Inventory* as a result of public comments and further agency review. Modifications are explained and listed under 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) and changes resulting from reevaluations of the wilderness character of certain inventoried lands and vehicle route determinations. A summary of all changes for each inventory area is provided at the end of this section.

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

## Background

On February 4, 1999, the Bureau of Land Management (BLM) released the *1999 Utah Wilderness Inventory*. Out of 3.1 million public land acres examined statewide (of which 618,193 acres were on lands administered by the Richfield Field Office), 2.6 million acres were found to have wilderness character. Wilderness character refers to the criteria from Section 2(c) of the *Wilderness Act of 1964*. Wilderness character criteria include size, naturalness, and outstanding opportunities for solitude or primitive and unconfined types of recreation. Qualifying areas must also be “roadless.”

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

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

### *Scoping and Public Involvement Process*

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

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

evaluations, and other materials for each of the areas inventoried were also made available for public review. Copies of these files were placed in BLM offices across Utah. Complete copies of all files were also provided to the State of Utah for their review and distribution.

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

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

#### *BLM Restructured The Planning Process To A Regional Approach*

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

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

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

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

initial scoping.

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

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

## **Evaluation of Wilderness Character**

### *Secretarial Direction*

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

The lands identified for the comprehensive “ground truthing” field review were those lands contained within proposed wilderness legislation before Congress at the time, HR 1500 and HR 1745. These legislative bills proposed wilderness designation for lands outside the boundaries of the 3.3 million acres of existing BLM WSAs previously designated during the early 1980s. These lands were the primary focus of the new field inventory initiative. Between 1996 and 1999 a total of 3.1 million public land acres were inventoried statewide, including 618,193 acres of BLM lands administered by the Richfield Field Office.

### *Wilderness Characteristics*

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

- 1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable (refers to whether an area looks natural to the average visitor - apparent naturalness);
- 2) has outstanding opportunities for solitude or a primitive and unconfined type of

recreation;

3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and

4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

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

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

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

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

On lands administered by the Richfield Field Office, 618,193 acres were inventoried for the presence or absence of wilderness character. Of the inventoried acres, 511,216 were found to possess wilderness character. Lands with wilderness character were found in all twenty of the inventory areas.

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

| Inventory Area             | Public Lands Inventoried (Acres) | Wilderness Character (Acres) |
|----------------------------|----------------------------------|------------------------------|
| Bull Mountain              | 3,900                            | 3,800                        |
| Bullfrog Creek             | 36,000                           | 29,900                       |
| Dirty Devil-French Spring  | 115,500                          | 94,400                       |
| Dogwater Creek             | 3,800                            | 3,500                        |
| Fiddler Butte              | 22,220                           | 16,720                       |
| Fremont Gorge              | 18,400                           | 14,963                       |
| Horseshoe Canyon South     | 20,700                           | 19,800                       |
| Jones Bench                | 2,837*                           | 2,837*                       |
| Labyrinth Canyon**         | 12,222                           | 12,211                       |
| Limestone Cliffs***        | 24,000                           | 23,800                       |
| Little Rockies             | 24,200                           | 24,200                       |
| Long Canyon                | 16,500                           | 16,500                       |
| Mount Ellen-Blue Hills     | 65,400                           | 32,600                       |
| Mount Hillers              | 1,290                            | 1,290                        |
| Mount Pennell              | 72,360                           | 61,880                       |
| Muddy Creek-Crack Canyon** | 66,506                           | 63,230                       |
| Notom Bench                | 9,000                            | 5,500                        |
| Ragged Mountain            | 27,400                           | 25,900                       |
| Red Desert                 | 39,200                           | 31,800                       |
| Wild Horse Mesa**          | 36,758                           | 26,748                       |
| <b>Total</b>               | <b>618,193</b>                   | <b>511,216</b>               |

\*The acreage figure for Jones Bench was incorrectly calculated in the *1999 Utah Wilderness Inventory*

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

\*\*\* Includes 1,060 acres in Emery County/Price Field Office, which is included in this Richfield Revision Document

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

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

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

As a result of these internal and external reviews, adjustments have been made to the planning baseline in sixteen of the twenty inventory areas under study in the Richfield 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 for WSA consideration; 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 Richfield, 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 crews. Since the development of these original maps, additional mapping information, primarily global position system (GPS) data provided by the State of Utah, Utah counties, private individuals, and BLM sources, has become available. Use of this improved mapping data and completion of additional field verification checks in many of the inventory areas have resulted in a number of mapping corrections. In addition, BLM cartographers closely compared the original maps found in the permanent documentation files with the maps published in the *1999 Utah Wilderness Inventory*, and found that several digitizing errors had been made. These errors have been corrected in the new planning baseline. Most of these changes involve very slight realignments of boundaries of the inventory areas.

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

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

inventory area boundaries have been redrawn to exclude state lands.

In some cases, the exclusion of state sections has also resulted in the severing of BLM lands that were connected to the wilderness inventory areas only by state lands. A total of 4,297 acres of BLM lands found in eleven 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.

|                           |            |              |
|---------------------------|------------|--------------|
| Bullfrog Creek            | 1,420      | acres        |
| Dirty Devil-French Spring | 94         | acres        |
| Fiddler Butte             | 23         | acres        |
| Fremont Gorge             | 694        | acres        |
| Little Rockies            | 100        | acres        |
| Mount Ellen-Blue Hills    | 127        | acres        |
| Mount Hillers             | 25         | acres        |
| Mount Pennell             | 826        | acres        |
| Ragged Mountain           | 329        | acres        |
| Red Desert                | 425        | acres        |
| Wild Horse Mesa           | <u>132</u> | <u>acres</u> |
| TOTAL                     | 4,297      | acres        |

### **Changes in Cherry-stems**

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

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

All vehicle routes that meet the BLM road definition used for wilderness inventory purposes have been cherry-stemmed. The North Caineville Reef Road in the Muddy Creek-Crack Canyon inventory area is an example of a road cherry-stem. The North Caineville Reef Road is approximately 9.0 miles long and extends from Caineville Wash north along the North Caineville Reef into Coal Mine Wash and connects to the Factory Butte Road. The route meets all the requirements of the BLM definition for a road, it is constructed, maintained, and receives regular and continuous use.

In some instances, a vehicle route that was determined to be a way because it does not meet the BLM road definition, constitutes a substantially noticeable intrusion, and has been cherry-stemmed. An example of this is in the Wild Horse Mesa inventory area. Way 19, which parallels Muddy Creek for approximately 2.1 miles, was determined to be a vehicle way because it was not constructed and is not maintained. The way is kept open by vehicle traffic and

receives regular and continuous use, primarily by OHVs. The hills and flats between Way 19 and the North Pinto Hills are scarred by numerous OHV trails.

The segment of Way 19 which is adjacent to the OHV disturbance has been cherry-stemmed as the edge of disturbance and the OHV play areas excluded from the area with wilderness character.

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

|   |   |
|---|---|
| <b><i>Bullfrog Creek</i></b>            | One cherry-stem has been expanded to include Clay Seep.   |
| <b><i>Dirty Devil-French Spring</i></b> | Two cherry-stems shortened; three cherry-stems added; one cherry-stem removed.  |
| <b><i>Horseshoe Canyon South</i></b>    | One cherry-stem extended; one cherry-stem removed.  |
| <b><i>Limestone Cliffs</i></b>          | One cherry-stem removed.  |
| <b><i>Little Rockies</i></b>            | One cherry-stem removed.  |
| <b><i>Mount Pennell</i></b>             | One cherry-stem removed.  |
| <b><i>Muddy Creek-Crack Canyon</i></b>  | One cherry-stem added to powerline R.O.W.   |
| <b><i>Ragged Mountain</i></b>           | One cherry-stem removed.  |
| <b><i>Red Desert</i></b>                | One vehicle way was determined to be substantial in character and has bisected the inventory area into two separate units.<br>One cherry-stem has been added. |

### **Changes in Wilderness Character Findings**

Numerous changes to the baseline inventory have been made due to a reevaluation of inventoried land, resulting in the addition or removal of large parcels (more than 100 acres) of BLM land.

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

Reevaluations of wilderness character have resulted in a reversal of the BLM's initial findings in several instances. Seven areas of public land were initially inventoried and found not to have wilderness character. Subsequently, they were reevaluated, found to have wilderness character, and added to seven inventory areas. Two areas were initially inventoried and found to have wilderness character, upon further evaluation they were found not to be natural in character and

have been dropped from the planning baseline. The paragraphs below summarize the changes and reasons for these modifications in each of the affected inventory areas.

Bullfrog Creek

Removal of 1,374 acres

*Approximately 1,374 acres initially found to possess wilderness character, have been removed from the planning baseline. A review of the inventory file found that a more significantly identifiable boundary was located along a large cliff line.*

The area in the vicinity of the township of Ticaboo was initially found to be natural in character and was included within a boundary that followed a low ridgeline and the base of a cliff wall. The area contains relatively few intrusions. A review of the inventory file determined that a more significantly identifiable boundary was possible if the top of the cliff line was utilized for that purpose. While the removal of 1,374 acres seems significant, it should be noted that the area that has been removed from the planning baseline stretches for five miles and is approximately 0.1 to 0.2 miles wide for the majority of its length, and 0.8 miles wide at its widest point.

Dirty Devil-French Springs:

Addition: of 17,531 acres

*Approximately 17,531 acres in Unit 1, initially found not to possess wilderness character, have been added to the planning baseline because they were found, upon further review, to possess wilderness character.*

The areas in Unit 1 were initially found not to be natural in character during the 1996-1999 wilderness inventory because of numerous vehicle routes and other cumulative impacts. Because of public comments and a lack of photographic documentation on these areas, a field review was conducted during the summer of 2002. The no wilderness character areas of Unit 1 extend from the northwest side of the inventory area north and east of Hanksville to the south side of the Dirty Devil River, then in isolated parcels in Hell Hole Swale, along Beaver Canyon, Baking Skillet Knoll and Bert Mesa.

The field team examined the no wilderness character areas in Unit 1 and noted only five substantial intrusions. The intrusions identified are scattered throughout this area so the cumulative effects are not substantial, resulting in 17,531 acres being identified as wilderness character and added to the planning baseline. Each of the intrusions were vehicle routes that were either roads or substantially noticeable ways. These routes were cherry-stemmed from the unit along with two stock ponds, a water tank, four drill holes and a trailhead parking area. The remainder of the intrusions consisted of several seismic lines in various stages of natural reclamation.

Fiddler Butte:

Addition: of 3,163 acres

*Approximately 3,163 acres in Unit 1, initially found not to possess wilderness character, have been added to the planning baseline because they were found, upon further review, to possess*

*wilderness character.*

The no wilderness character area of Unit 1, which encompasses the area above Poison Canyon on the west side of the unit and Cedar Point, was reevaluated by the field team. Because of public comments and a lack of photographic documentation on these areas, a field review was conducted during the summer of 2002. These two areas had been determined to have no wilderness character because of vehicle routes and other cumulative impacts. The re-evaluation determined most of the area was natural in character and a boundary was identified that is more substantial on the ground than the current use of the canyon rim and point to point boundary identified during the 1999 inventory.

In the western area by Poison Canyon, the field team identified several seismic lines and a single vehicle route that accesses a drill hole. Most of the seismic lines were in various stages of natural reclamation and partially buried in drift sand. A vehicle route in section 15 that extends to section 16 was determined to be the edge of disturbance, isolating range facilities and a corral from the area with wilderness character. This has resulted in approximately 2,201 acres being added to the planning baseline.

The area on Cedar Point between the inventoried wilderness character boundary and a single route identified as a substantially noticeable way (FB-1), was determined to be natural in character. The area to the south west of this route is cut by several seismic lines and is isolated from the rest of the area by FB-1 and is identified as having no wilderness character. The area on the east side of Cedar Point was found to be impacted by OHV hill climbs and other activity, which are encroaching on the benches of the point. The field team identified a seismic line which trends east/west and ties in with FB-1 and a vehicle route identified as FB-2 as the more clearly identifiable boundaries in this area. This boundary would exclude the impacted areas along the main boundary road on Cedar Point. This has resulted in approximately 962 acres being added to the planning baseline.

Fremont Gorge

Addition: of 939 acres

*Approximately 939 acres, initially found not to possess wilderness character, have been added to the planning baseline because they were found, upon further review, to possess wilderness character.*

The field team examined the no wilderness character area east of Wide Hollow on Miners Mountain. Because of public comments, an internal review of the inventory file, and a lack of photo documentation of the area, a field review was conducted during the fall of 1999. A single seismic line that has been closed and rehabilitated was found in the area. A few other cross-country routes were also documented, but the area was natural in character as a whole. This has resulted in approximately 939 acres being added to the planning baseline.

Horseshoe Canyon South:

Addition: of 813 acres

*Approximately 813 acres in Unit 1, initially found not to possess wilderness character, have been*

*added to the planning baseline because they were found, upon further review, to possess wilderness character.*

The area in Unit 1 was initially found not to be natural in character during the 1996-1999 wilderness inventory because the inventory utilized a fence line as the boundary of wilderness character. Public comments and a lack of photographic documentation on this area, resulted in a field review that was conducted during the summer of 2002.

The field team examined the no wilderness character area in Antelope Valley, between Little Saucer Basin and Buffalo Pond. The area consists of a wide valley with low sloping grass covered hills. The field team determined that the fence line was not a substantially noticeable intrusion. There are no intrusions in the area between the fence line and the North Horseshoe Canyon Road and the Hans Flat Road and the area was determined to be natural in character. This has resulted in approximately 813 acres being added to the planning baseline.

Limestone Cliffs:

Addition: of 218 acres

*Approximately 218 acres in Unit 1, initially found not to possess wilderness character, have been added to the planning baseline because they were found, upon further review, to possess wilderness character.*

The no wilderness character area in the northeast part of the inventory area was examined because of public comments and a lack of photographic documentation. A field review was conducted in the area during the summer of 2001.

The field team examined the area and documented the presence of several concrete foundations and pads, three rock walls, a wire corral and the remnants of several coal stockpiles. A single vehicle route approximately 0.2 miles in length provided access to this area. The field team determined that the area beyond these intrusions was not impacted and was natural in character. The impacted area continues to be identified as having no wilderness character and has been excluded. As a result, approximately 218 acres have been added to the planning baseline.

Mount Ellen-Blue Hills:

Addition: of 15,893 acres

*Approximately 15,893 acres in Units 2 and 3, initially found not to possess wilderness character, have been added to the planning baseline because they were found, upon further review, to possess wilderness character.*

The areas in Unit 2 and 3 were initially found not to be natural in character during the 1996-1999 wilderness inventory because of numerous vehicle routes and other cumulative impacts. Because of public comments and a lack of photographic documentation on these areas, a field review was conducted during the fall of 1999.

The field team examined the no wilderness character area in Unit 2 which is on the west side of the Henry Mountains. The wilderness character boundary in this unit is based on a vehicle route

that parallels the base of the mountain range. The field team determined that the route no longer exists and is not a viable boundary. The team then examined the area within the inventory unit between this boundary and the Notom Road. The team determined the area was primarily natural in character, with the exception of several roads, substantially noticeable ways and mining sites, which have been cherry-stemmed as boundaries or excluded. A wilderness character/no wilderness character boundary was then established using these routes, existing private land and state lands. This action has resulted in approximately 7,973 acres being added to the planning baseline.

The field team examined the no wilderness character area in Unit 3, which is on the east side of the Henry Mountains in the vicinity of the Blue Valley Benches. The team noted that the majority of this unit was natural in character, with the exception of the area in the vicinity of Coaly Wash. This area contains Buffalo Reservoir, a water trough and pipeline, and fence line and two ways, which were determined to cumulatively impact the site. The field team determined that the fence line and ways are cumulatively significant and separate wilderness from no wilderness character. This action has resulted in approximately 7,920 acres being added to the planning baseline.

Muddy Creek-Crack Canyon:

Removal of 2,318 acres

*Approximately 2,318 acres in the inventory area, initially found to possess wilderness character, have been removed from the planning baseline because they were found, upon further review, not to possess wilderness character.*

The area on the Upper Blue Hills in the vicinity of Neilson Wash was initially found to possess wilderness character during the 1996-99 wilderness inventory. The current MFP has designated the area as open to OHV use which has allowed for cross-country OHV traffic in the area. The area has since been subject to increasing OHV use which has impacted the naturalness of the area. As a result 2,130 acres have been determined not to be natural in character and have been removed from the planning baseline.

An area along the southwestern boundary of the unit in the vicinity of Caineville, was initially found to possess wilderness character during the 1996-1999 wilderness inventory. The current MFP has designated the area as open to OHV use which has allowed for cross-country OHV traffic in the area. The area has since been subject to increasing OHV use which has impacted the naturalness of the area. As a result 188 acres have been determined not to be natural in character and have been removed from the planning baseline.

Ragged Mountain:

Removal: of 249 acres

*Approximately 249 acres in the inventory area, initially found to possess wilderness character, have been removed from the planning baseline because they were found, upon further review, not to possess wilderness character.*

An area along the western boundary of the inventory area, in the vicinity of Dark Canyon, adjacent to the Mount Pennell WSA, was reevaluated and determined not to possess wilderness



character. The 249 acres includes five 30+ year-old chainings which were determined not to be natural in character. The boundary of the area with wilderness character has been moved to the eastern edge of the chainings.

Wildhorse Mesa:

Addition: of 8,308 acres

*Approximately 8,308 acres in the inventory area, initially found not to possess wilderness character, have been added to the planning baseline because they were found, upon further review, to possess wilderness character.*

The no wilderness character areas in the inventory unit were initially found not to be natural in character during the 1996-1999 wilderness inventory because of numerous vehicle routes and other cumulative impacts. Because of public comments and a lack of photographic documentation on these areas, a field review was conducted during the fall of 1999 and the fall of 2001.

The field team examined the no wilderness character area in the vicinity of Hanksville and along the North Pinto Hills. The team determined the area was primarily natural in character with the exception of several roads, substantially noticeable ways, the Hanksville airport and OHV/recreational use sites, which have been cherry-stemmed as boundaries or excluded. A wilderness character/no wilderness character boundary was then established using these routes, existing private land and state lands. This action has resulted in approximately 8,026 acres being added to the planning baseline.

The field team examined the no wilderness character area in the vicinity of Coal Mine Wash and the Skyline Rim. The team determined that the area north of Coal Mine Wash was impacted by an existing abandoned coal mine, an airstrip, and active exploratory mining pits. These intrusions continue to be considered substantial impacts and the area here is not natural in character. The field team did note that the area south of Coal Mine Wash was not impacted by intrusions and was natural in character. A natural wash in the area was identified as the boundary separating this area from the impacted area to the north. As a result of this action, approximately 282 acres have been added to the planning baseline.

### **Summary of Changes By Inventory Area**

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

#### *Tips On Using the Maps in this Section*

The “Baseline Modifications” maps (Maps 2.1 to 2.16) show the original lands found to have wilderness character in the 1999 *Utah Wilderness Inventory* and the new planning baseline. Differences between the two sets of data are lettered (i.e. A, B, C...) and described in accompanying narratives.

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

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

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

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

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

No modifications to the planning baseline were made in Jones Bench, Labyrinth Canyon, or Long Canyon inventory areas, except for the exclusion of state lands.

**Table 2-1: Summary of Changes by Inventory Area**

| INVENTORY AREA                              | BASELINE MODIFICATIONS   |
|---|--|
| <b>Bullfrog Creek</b><br>(Refer to Map 2.2) | A These parcels (~101 acres) have been severed from the inventory area by state lands and have been removed from the planning baseline.          |
|   | B The boundary in this location has been slightly realigned to correct a digitizing error.   |
|   | C These parcels (~1,320 acres) have been severed from the inventory area by state lands and have been removed from the planning baseline.        |
|   | D The boundary in this location has been slightly realigned to correct a digitizing error.   |
| <b>Bull Mountain</b><br>(Refer to Map 2.1)  | A This area (~26 acres) was dropped from the planning baseline because it was found not to be natural in character due to vegetative treatments. |

| <b>INVENTORY AREA</b>                                  | <b>BASELINE MODIFICATIONS</b>   |
|--|---|
| <b>Dirty Devil-French Spring</b><br>(Refer to Map 2.3) | A This route was reexamined and a portion of it was determined to be a substantially unnoticeable way. The cherry-stem has been removed on the unsubstantial section of the route.  |
|  | B This parcel (~79 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.  |
|  | C This parcel (~8 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.   |
|  | D This parcel (~7 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.   |
|  | E This route was examined and found to be a road and a cherry-stem has been added to the planning baseline.   |
|  | F Approximately 1,547 acres have been added to the planning baseline because they were found upon further review to possess wilderness character.   |
|  | G Approximately 7,931 acres have been added to the planning baseline because they were found upon further review to possess wilderness character.   |
|  | H Approximately 301 acres have been added to the planning baseline because they were found upon further review to possess wilderness character.   |
|  | I This route was reexamined and a portion of it was determined to be a substantially unnoticeable way. The cherry-stem has been removed on the unsubstantial section of the route.  |
|  | J Approximately 5,090 acres have been added to the planning baseline because they were found upon further review to possess wilderness character.   |
|  | K This route was reexamined and found to be a vehicle way that is not a substantially noticeable intrusion on the natural character of the area. The cherry-stem on this vehicle way has been removed from the planning baseline. |
|  | L This route was examined and found to be a road and a cherry-stem has been added to the planning baseline.   |
|  | M Approximately 1,868 acres have been added to the planning baseline because they were found upon further review to possess wilderness character.   |
|  | N Approximately 686 acres have been added to the planning baseline because they were found upon further review to possess wilderness character.   |
| <b>Dogwater Creek</b><br>(Refer to Map 2.3)            | A Approximately 360 acres have been added to the planning baseline in order to correct a mapping error.   |
| <b>Fiddler Butte</b><br>(Refer to Map 2.4)             | A Approximately 2,201 acres have been added to the planning baseline because they were found upon further review to possess wilderness character.   |

| INVENTORY AREA                                      | BASELINE MODIFICATIONS  |
|---|---|
|   | B Approximately 962 acres have been added to the planning baseline because they were found upon further review to possess wilderness character.   |
|   | C This parcel (~23 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.  |
| <b>Fremont Gorge</b><br>(Refer to Map 2.5)          | A This parcel (~33 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.  |
|   | B These parcels (~661 acres) have been severed from the inventory area by state lands and have been removed from the planning baseline.   |
|   | C Approximately 939 acres have been added to the planning baseline because they were found upon further review to possess wilderness character.   |
|   | D Approximately 12 acres have been removed from the planning baseline because of severing by a telephone line right-of-way.   |
|   | E Approximately 10 acres have been removed from the planning baseline because of a community pit.   |
| <b>Horseshoe Canyon South</b><br>(Refer to Map 2.6) | A This way was reexamined and a portion of it was found to be a substantially noticeable intrusion on the natural character of the area. The cherry-stem has been extended 0.3 miles along this vehicle way to a drill hole.  |
|   | B This route was reexamined and found to be a vehicle way that is not a substantially noticeable intrusion on the natural character of the area. The cherry-stem on this vehicle way has been removed from the planning baseline.   |
|   | C Approximately 813 acres have been added to the planning baseline because they were found upon further review to possess wilderness character.   |
|   | D Approximately 2.5 acres have been removed from the planning baseline in order to exclude three structures and a spring development along a cherry-stem.   |
| <b>Limestone Cliffs*</b><br>(Refer to Map 2.7)      | A Approximately 218 acres have been added to the planning baseline because they were found to possess wilderness character.   |
|   | B The boundary has been slightly realigned to correct a digitizing error.   |
|   | C This cherry-stem has been removed from the planning baseline. This spur route was cherry-stemmed in the legislative proposal (H.R. 1500) that was the focus of the <i>1999 Utah Wilderness Inventory</i> . However, upon further review, this route was found to be a vehicle way that does not constitute a substantially noticeable intrusion on natural character. |
|   | D The boundary has been slightly realigned to correct a digitizing error.   |

| INVENTORY AREA  | BASELINE MODIFICATIONS  |
|---|---|
| <b>Little Rockies</b><br>(Refer to Map 2.8)               | A This route was reexamined and found to be a vehicle way that is not a substantially noticeable intrusion on the natural character of the area. The cherry-stem on this vehicle way has been removed from the planning baseline. |
|   | B This parcel (~73 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.  |
|   | C This parcel (~27 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.  |
| <b>Mount Ellen-Blue Hills</b><br>(Refer to Map 2.9)       | A Approximately 7,973 acres have been added to the planning baseline because they were found to possess wilderness character.   |
|   | B Approximately 7,920 acres have been added to the planning baseline because they were found to possess wilderness character.   |
|   | C The boundary in this location has been slightly realigned to correct an administrative error.   |
|   | D This parcel (~127 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.   |
|   | E The boundary has been slightly realigned to correct a mapping error.  |
| <b>Mount Hillers</b><br>(Refer to Map 2.10)               | A This parcel (~25 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.  |
|   | B The boundary has been realigned to correct a digitizing error, dropping approximately 252 acres from the planning baseline.   |
| <b>Mount Pennell</b><br>(Refer to Map 2.11)               | A This route was reexamined and found to be a vehicle way that is not a substantially noticeable intrusion on the natural character of the area. The cherry-stem on this vehicle way has been removed from the planning baseline. |
|   | B This parcel (~826 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.   |
|   | C This parcel (~158 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.   |
| <b>Muddy Creek-Crack Canyon**</b><br>(Refer to Map 2.12 ) | A This area (~2,130 acres) was dropped from the planning baseline because it was found not to be natural in character due to extensive OHV impacts.   |
|   | B The boundary has been slightly realigned to correct a digitizing error.   |
|   | C This area (~188 acres) was dropped from the planning baseline because it was found not to be natural in character due to extensive OHV impacts.   |

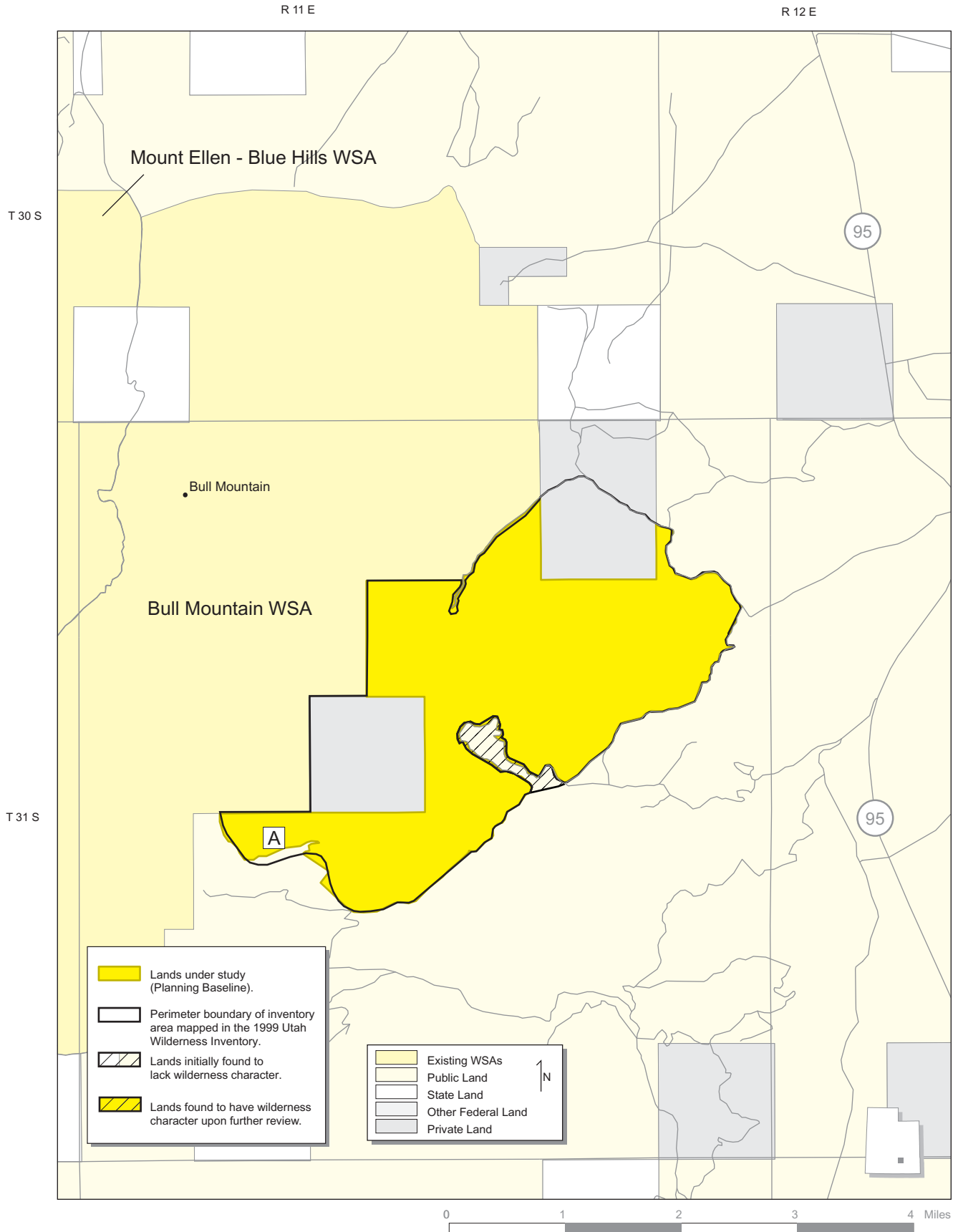
| INVENTORY AREA                                    | BASELINE MODIFICATIONS  |
|---|---|
| <b>Notom Bench</b><br>(Refer to Map 2.13 )        | A The boundary has been realigned to correct a digitizing error, adding approximately 873 acres to the planning baseline.   |
|   | B The boundary has been slightly realigned to correct a digitizing error.   |
|   | C The boundary has been slightly realigned to correct a digitizing error.   |
| <b>Ragged Mountain</b><br>(Refer to Map 2.14)     | A This route was reexamined and found to be a vehicle way that is not a substantially noticeable intrusion on the natural character of the area. The cherry-stem on this vehicle way has been removed from the planning baseline.                         |
|   | B This parcel (~173 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.   |
|   | C This area (~49 acres) was dropped from the planning baseline because it was found not to be natural in character due to vegetative manipulation treatments.   |
|   | D This area (~200 acres) was dropped from the planning baseline because it was found not to be natural in character.  |
|   | E This parcel (~156 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.   |
| <b>Red Desert</b><br>(Refer to Map 2.15)          | A The boundary has been slightly realigned to correct a mapping error.  |
|   | B This parcel (~425 acres) has been severed from the inventory area by state lands and a cherry-stem. Contiguous National Park Service lands are not administratively endorsed for wilderness, so the parcel has been removed from the planning baseline. |
|   | C The boundary has been slightly realigned to correct a digitizing error.   |
|   | D This vehicle way was found to be a road and substantial way, which has resulted in unit 1 being bisected into two separate parcels.   |
|   | E This vehicle way was found to be a road and has been cherry-stemmed.  |
| <b>Wild Horse Mesa **</b><br>(Refer to Map 2.16 ) | A Approximately 8,026 acres have been added to the planning baseline because they were found to possess wilderness character.   |
|   | B Approximately 282 acres have been added to the planning baseline because they were found to possess wilderness character.   |
|   | C This parcel (~132 acres) has been severed from the inventory area by state lands and has been removed from the planning baseline.   |

\* Includes 1,060 acres in Emery County/Price Field Office, which is included in this Richfield Revision Document

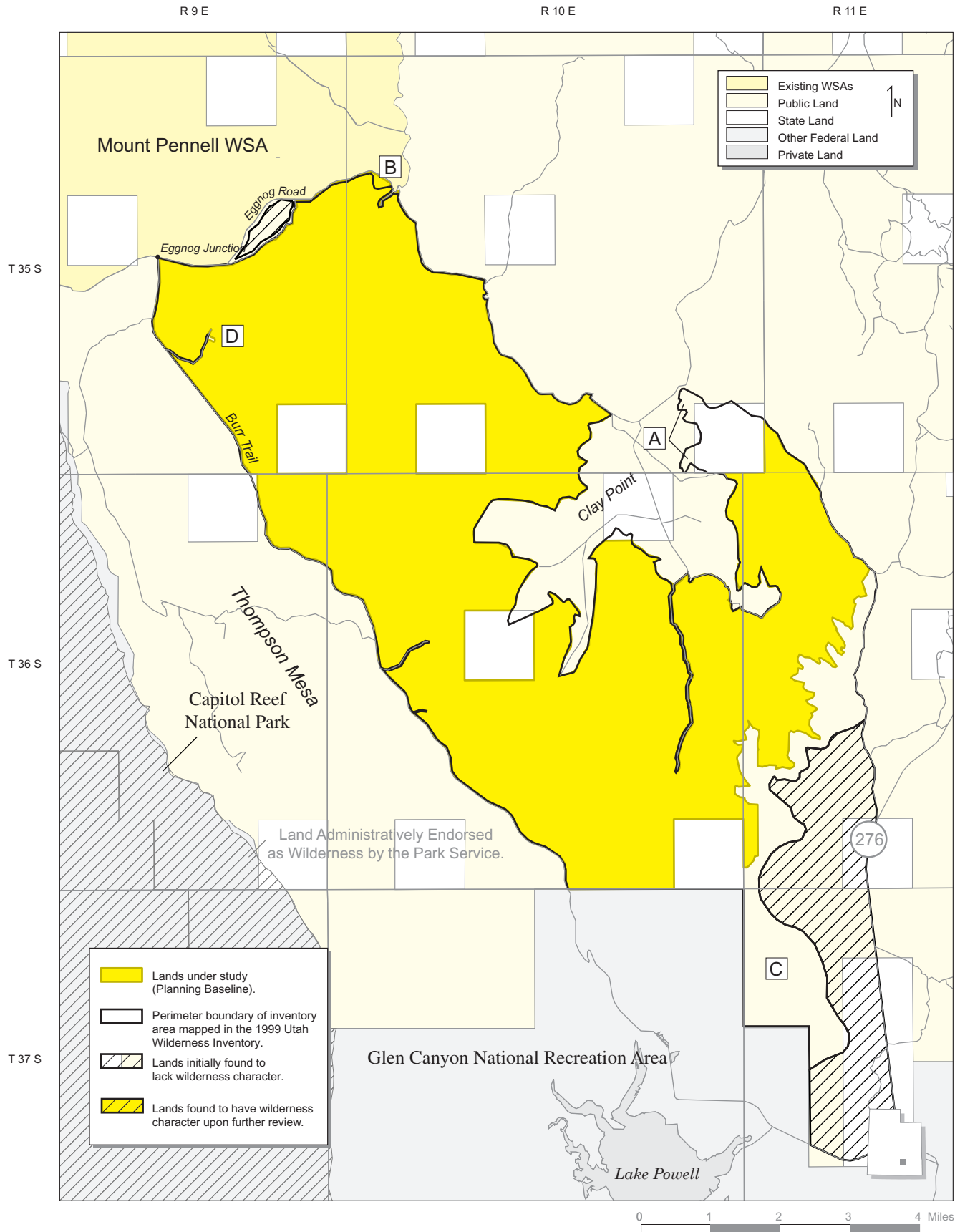
\*\* This document identifies baseline modifications only for that portion of the inventory area administered by the Richfield Field Office

### *Explanation of Acreage Summary Table in this Section*

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

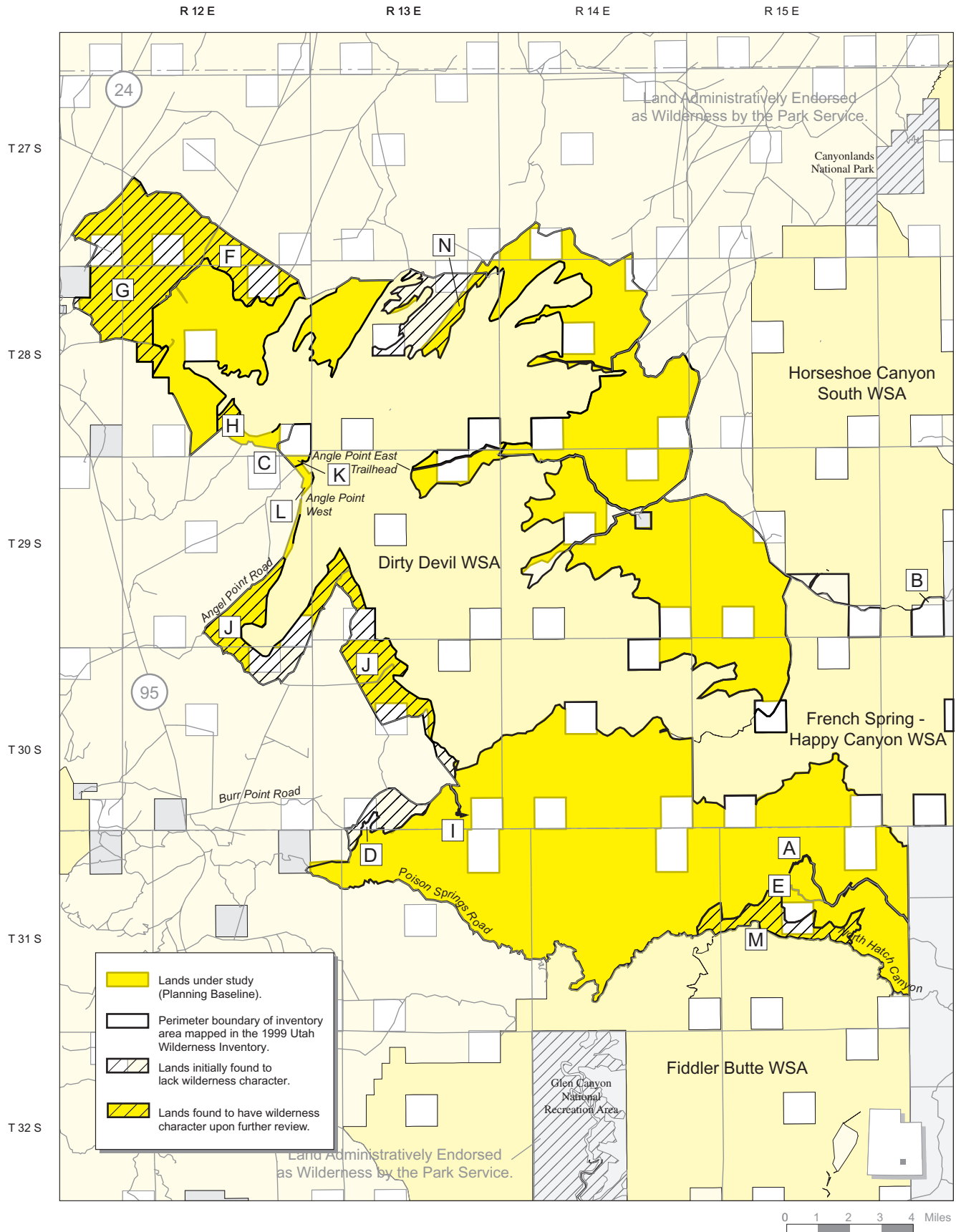


MAP 2.1

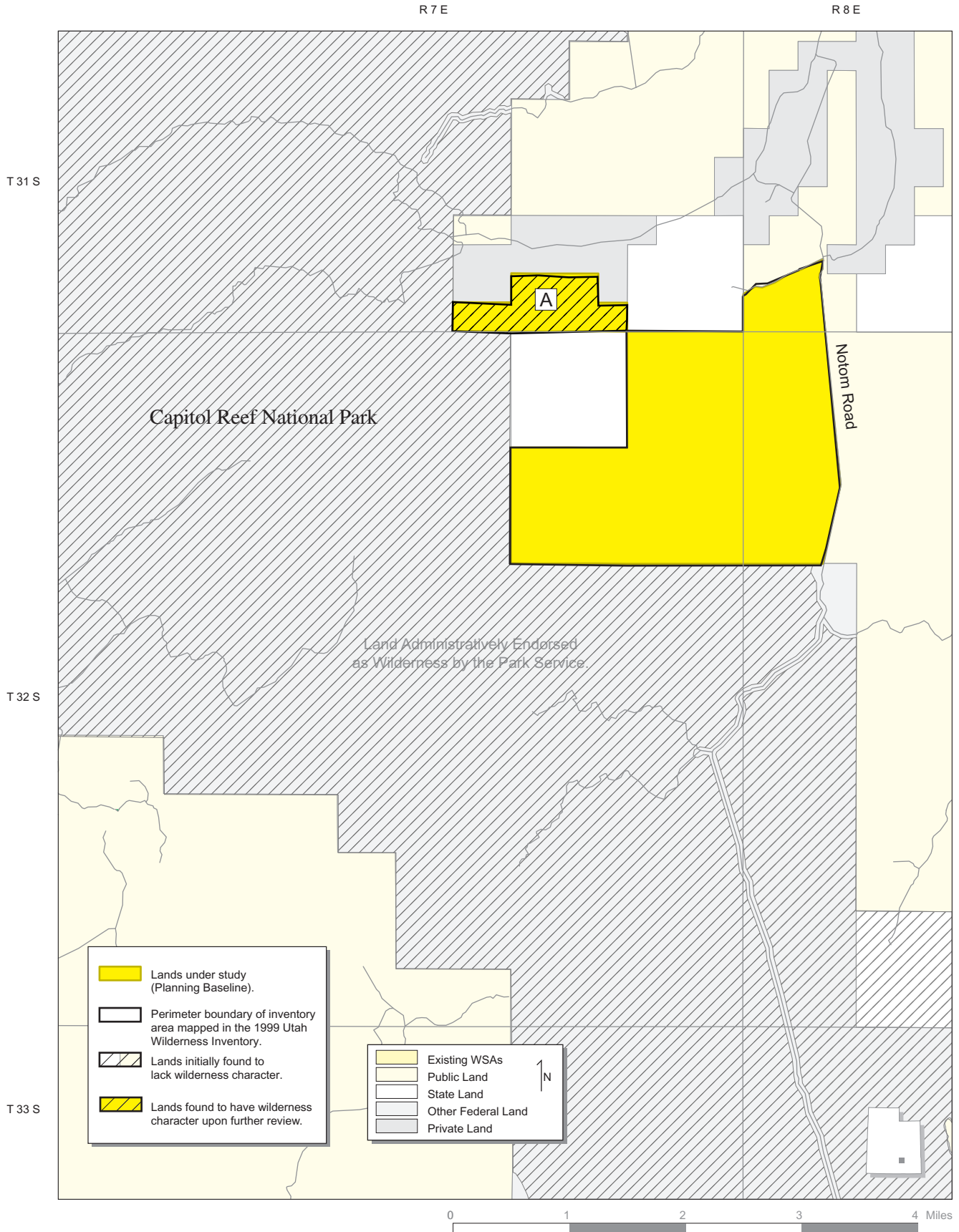


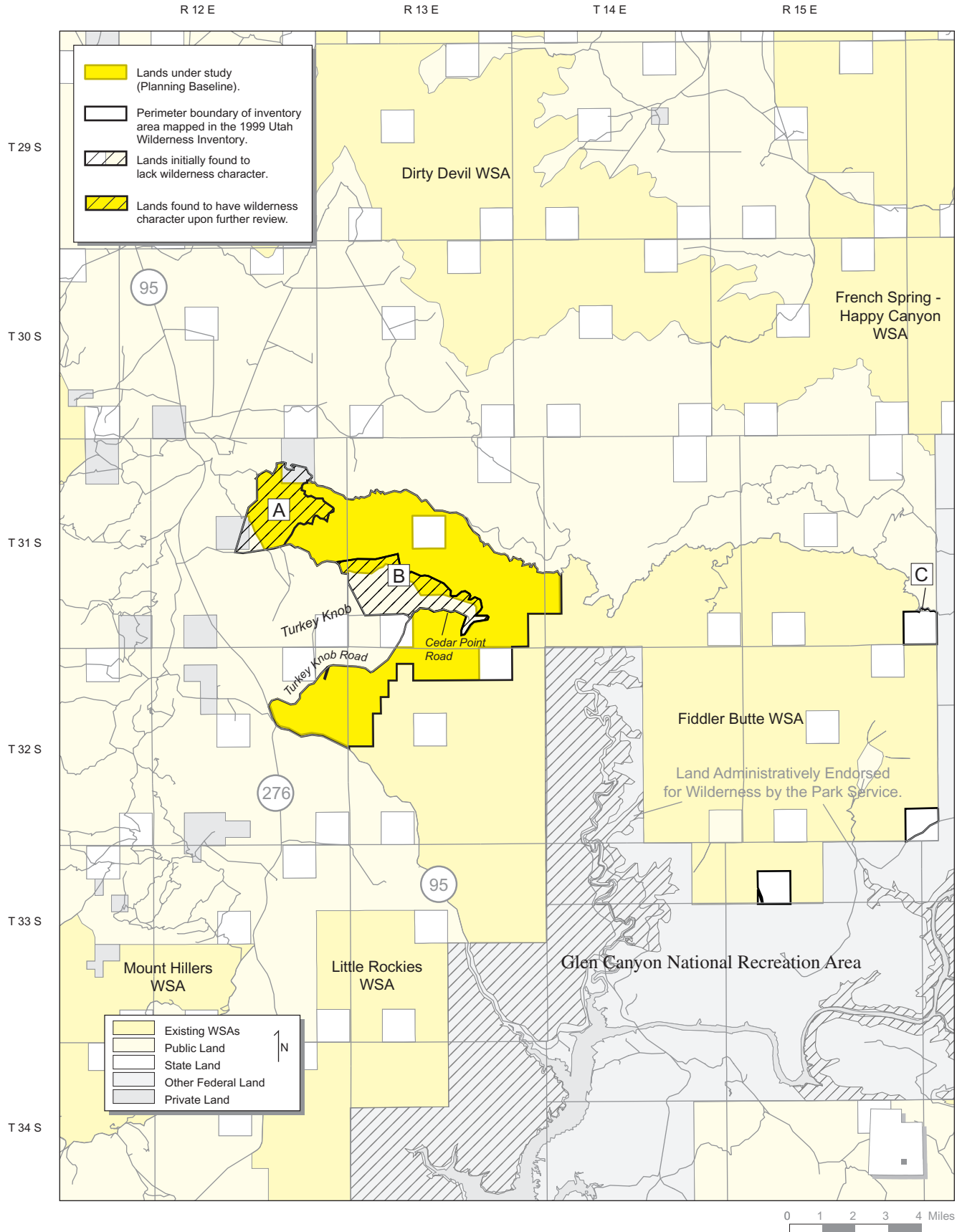
**MAP 2.2**



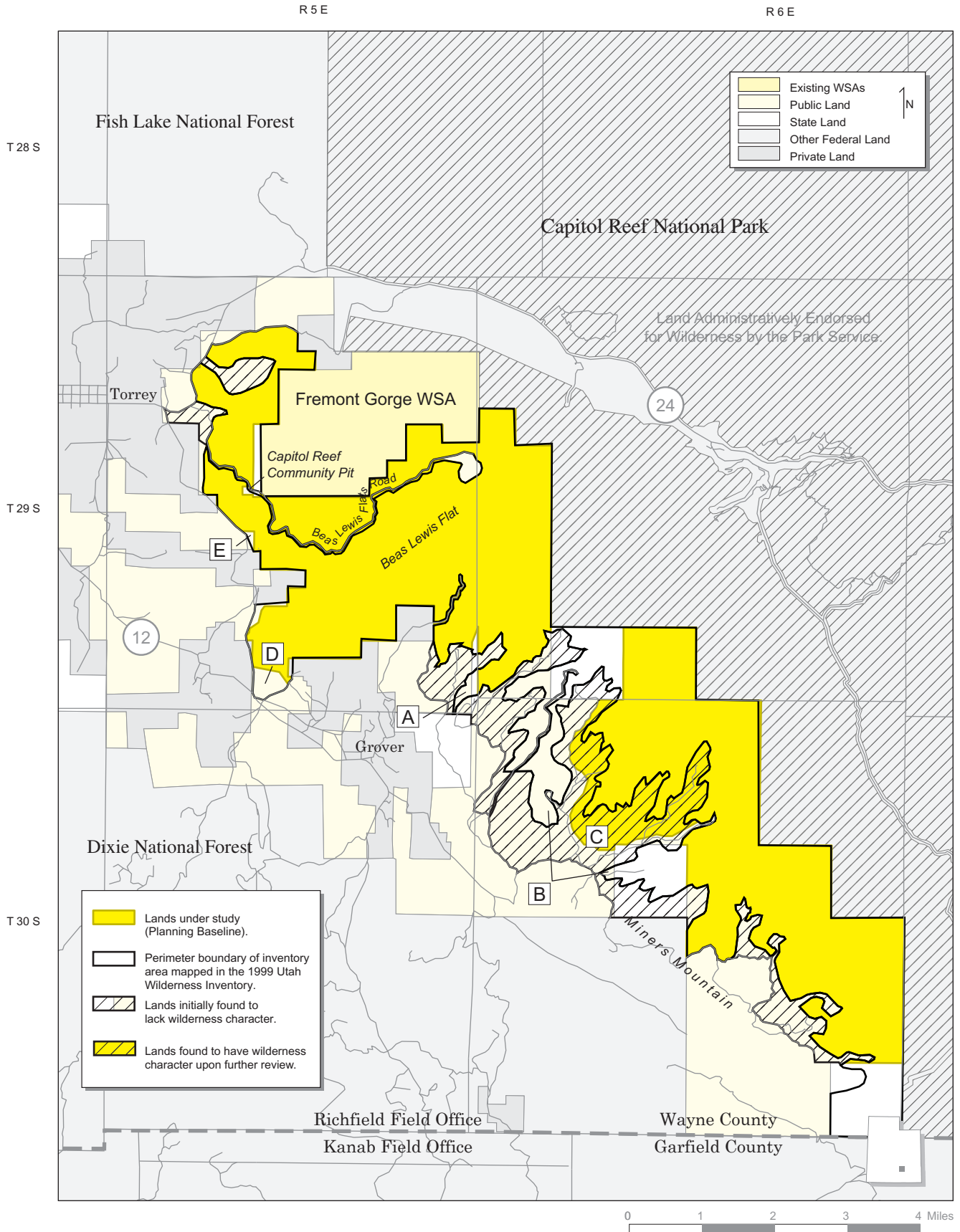


**MAP 2.3**





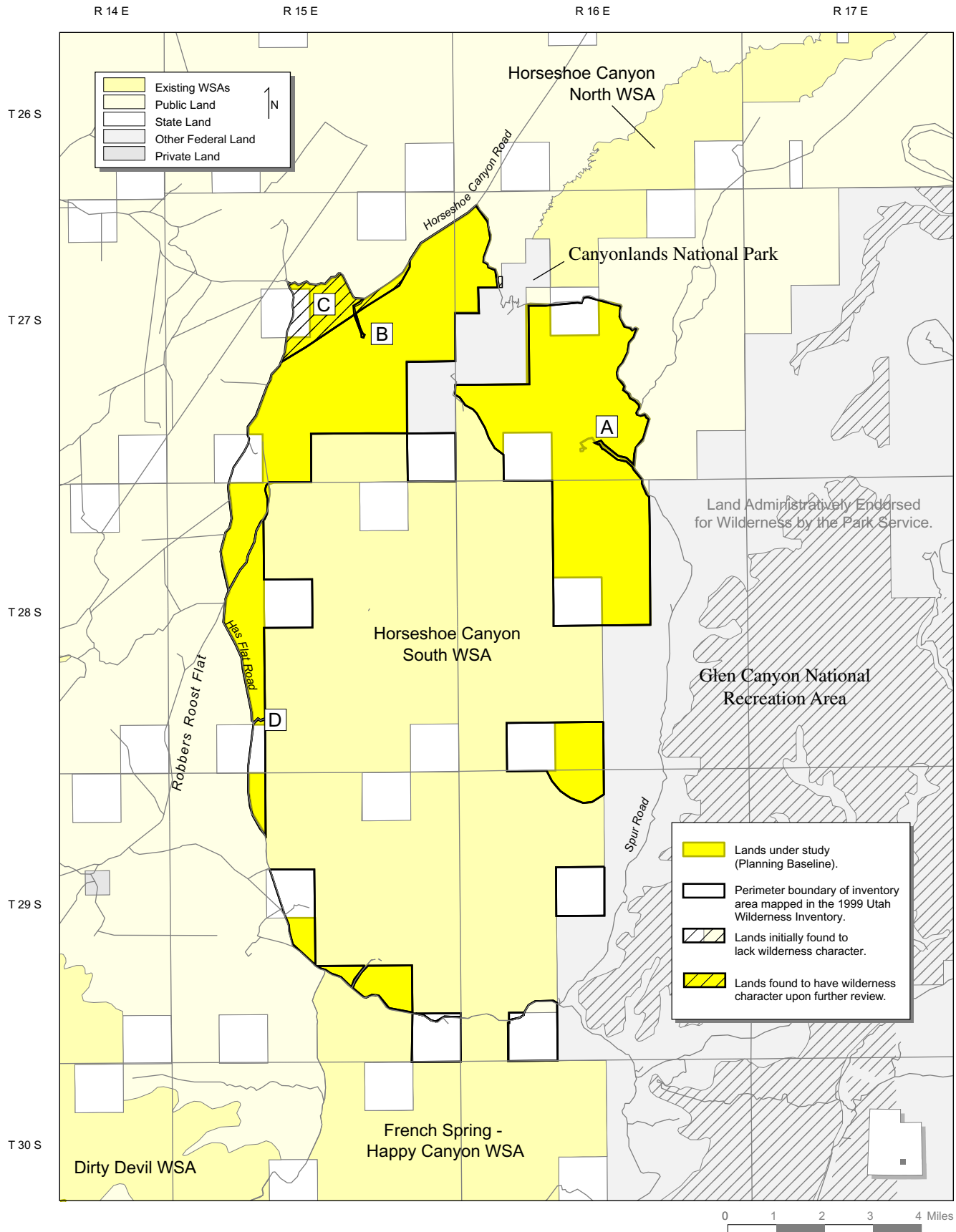
**MAP 2.5**



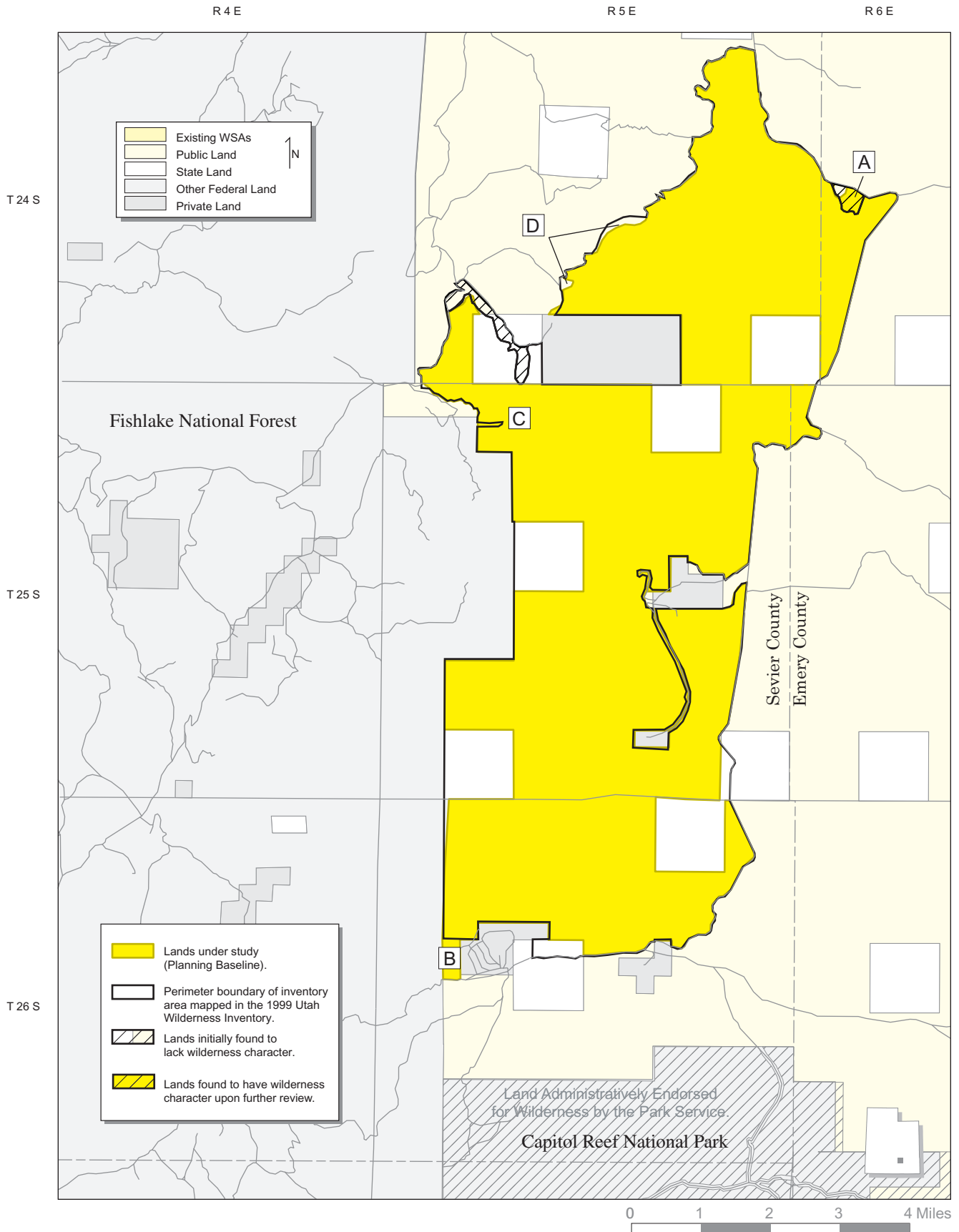
MAP 2.6

# Horseshoe Canyon South

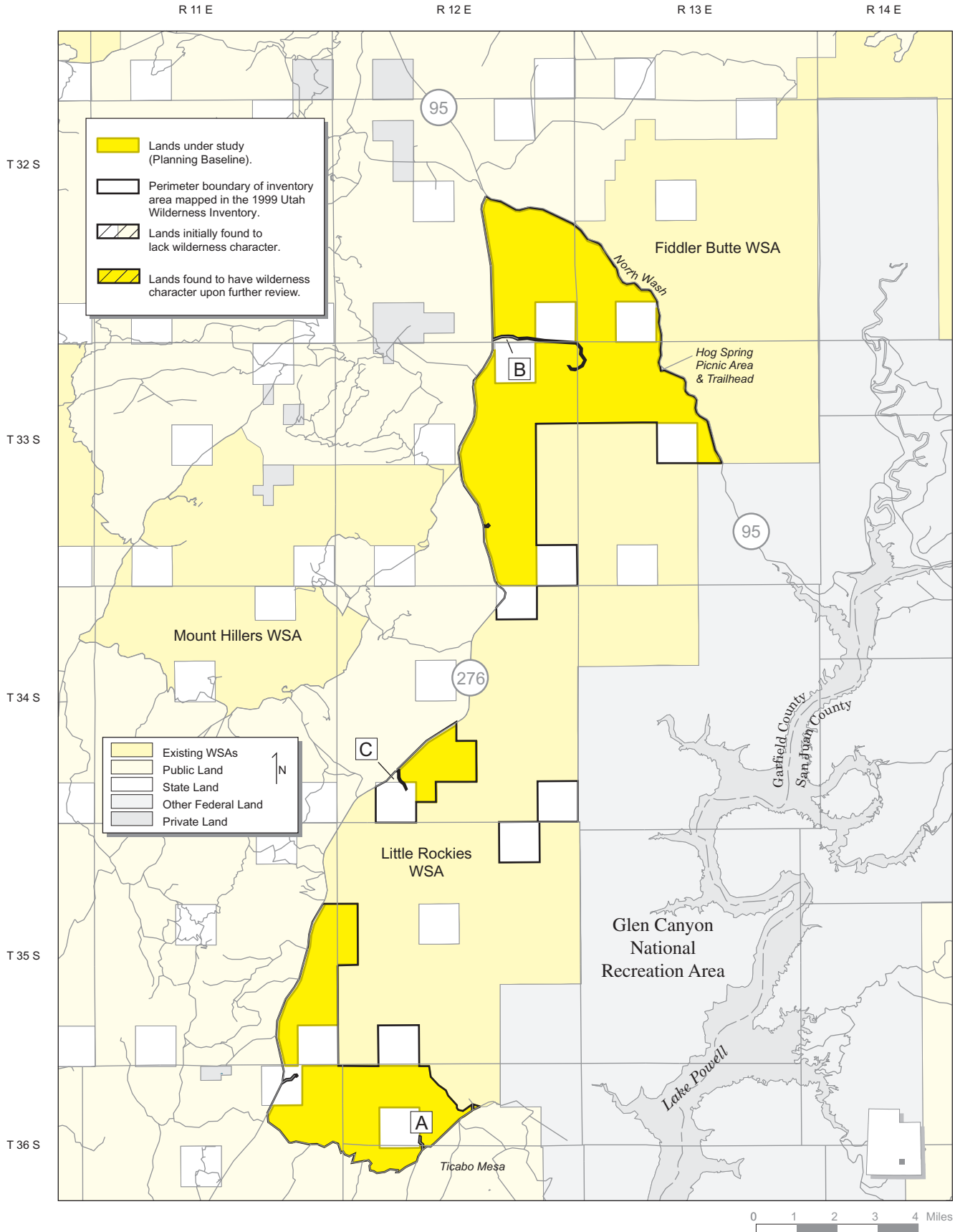
# Baseline Modifications



**MAP 2.7**

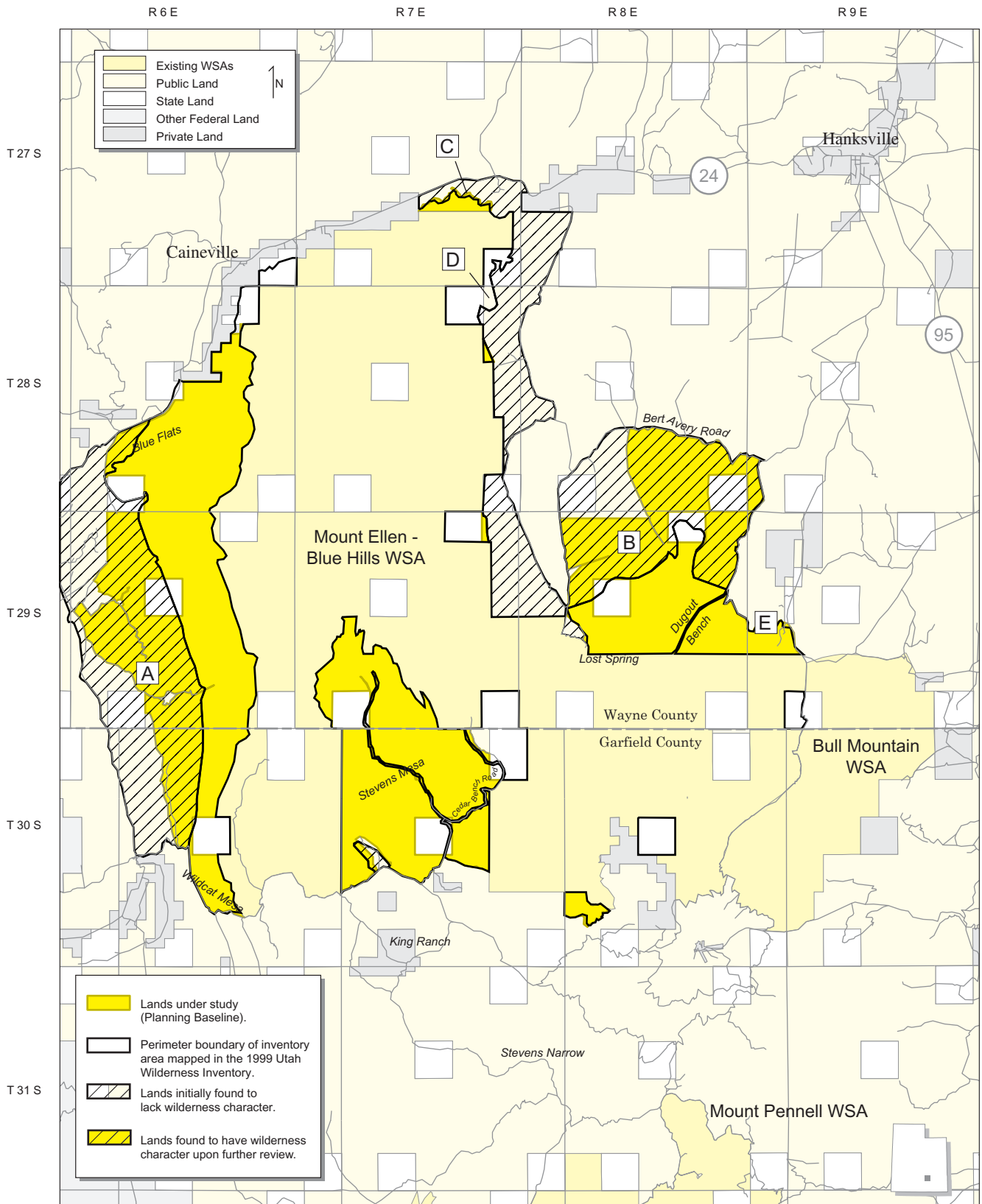


**MAP 2.8**



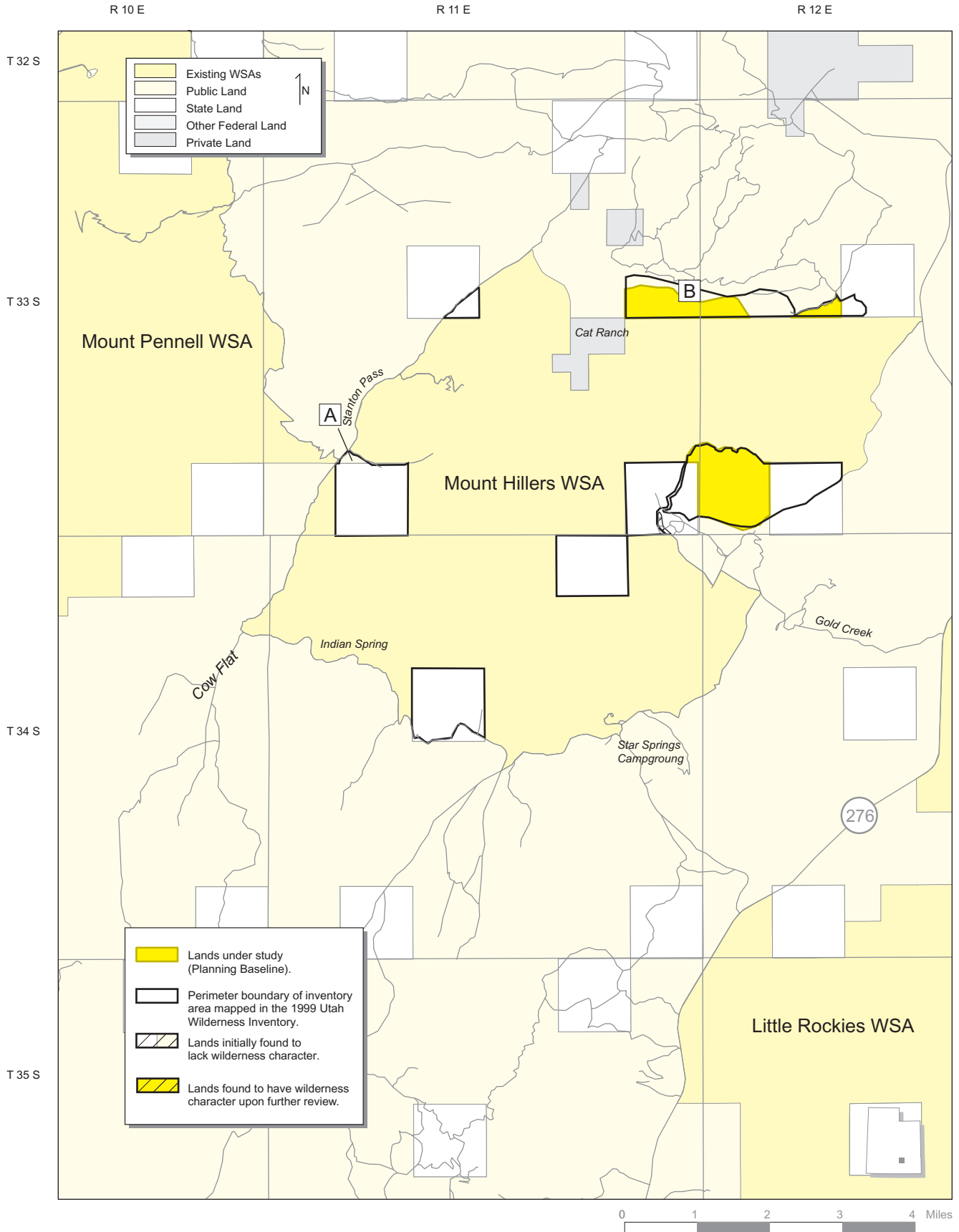
**MAP 2.9**



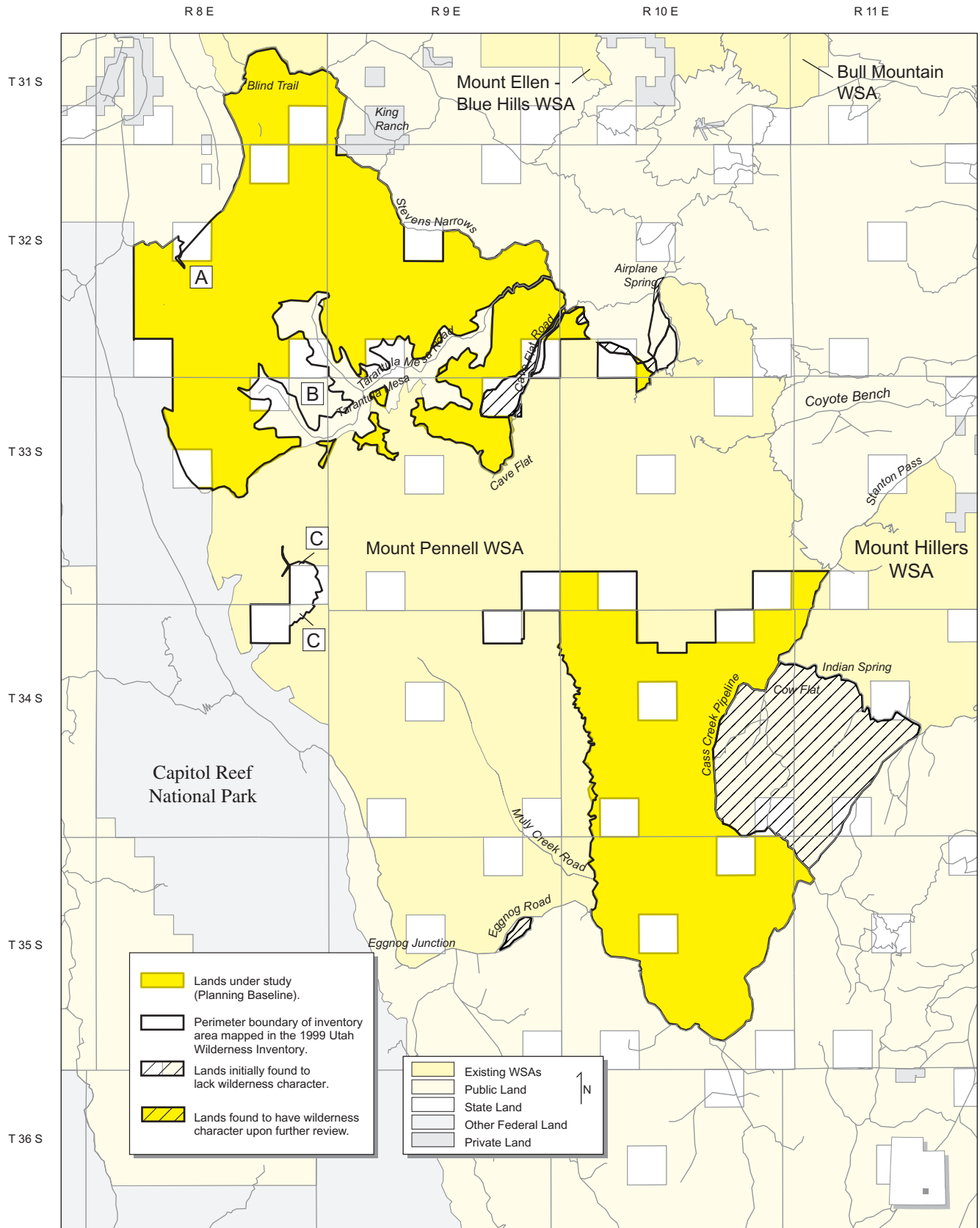


MAP 2.10





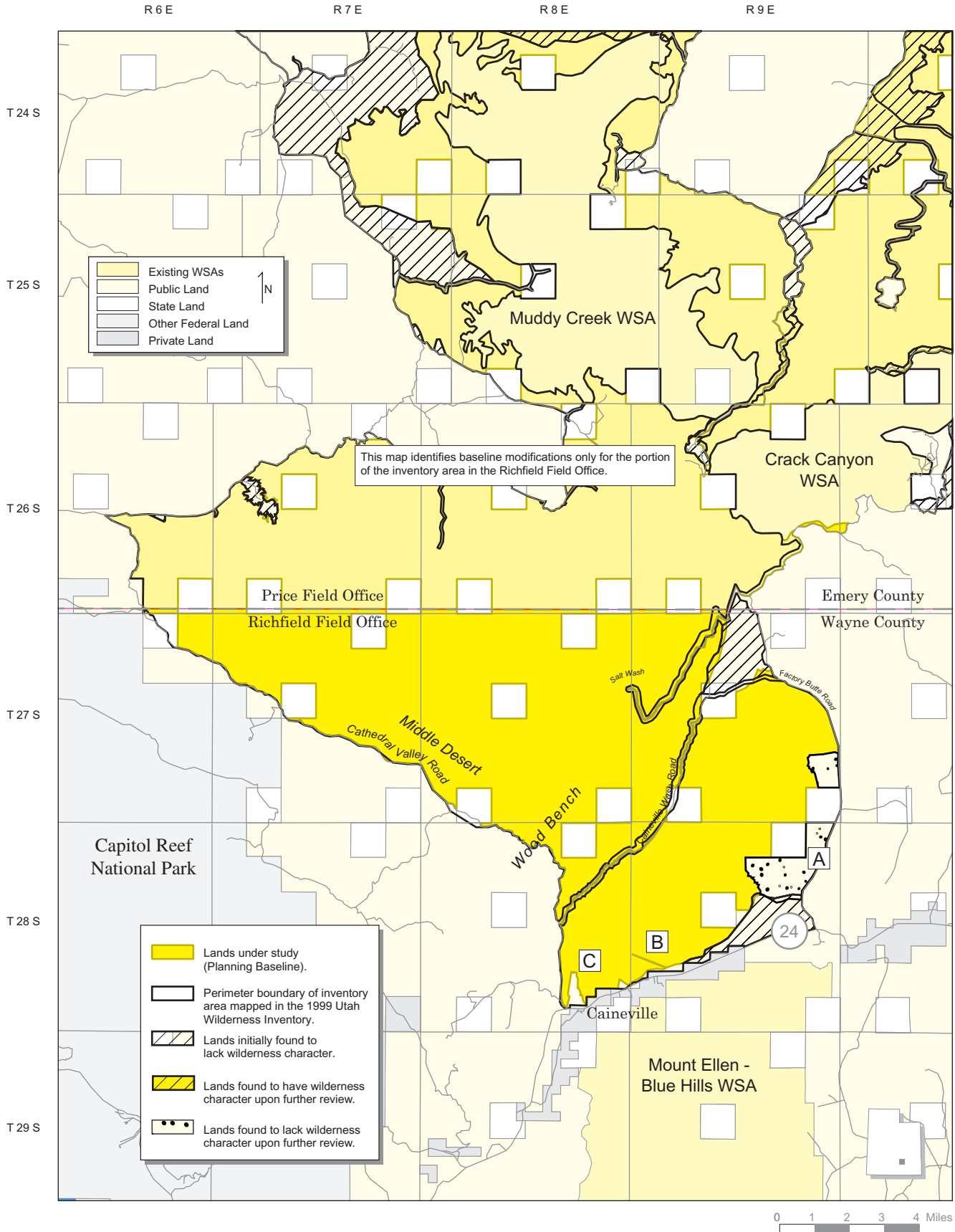
MAP 2.11



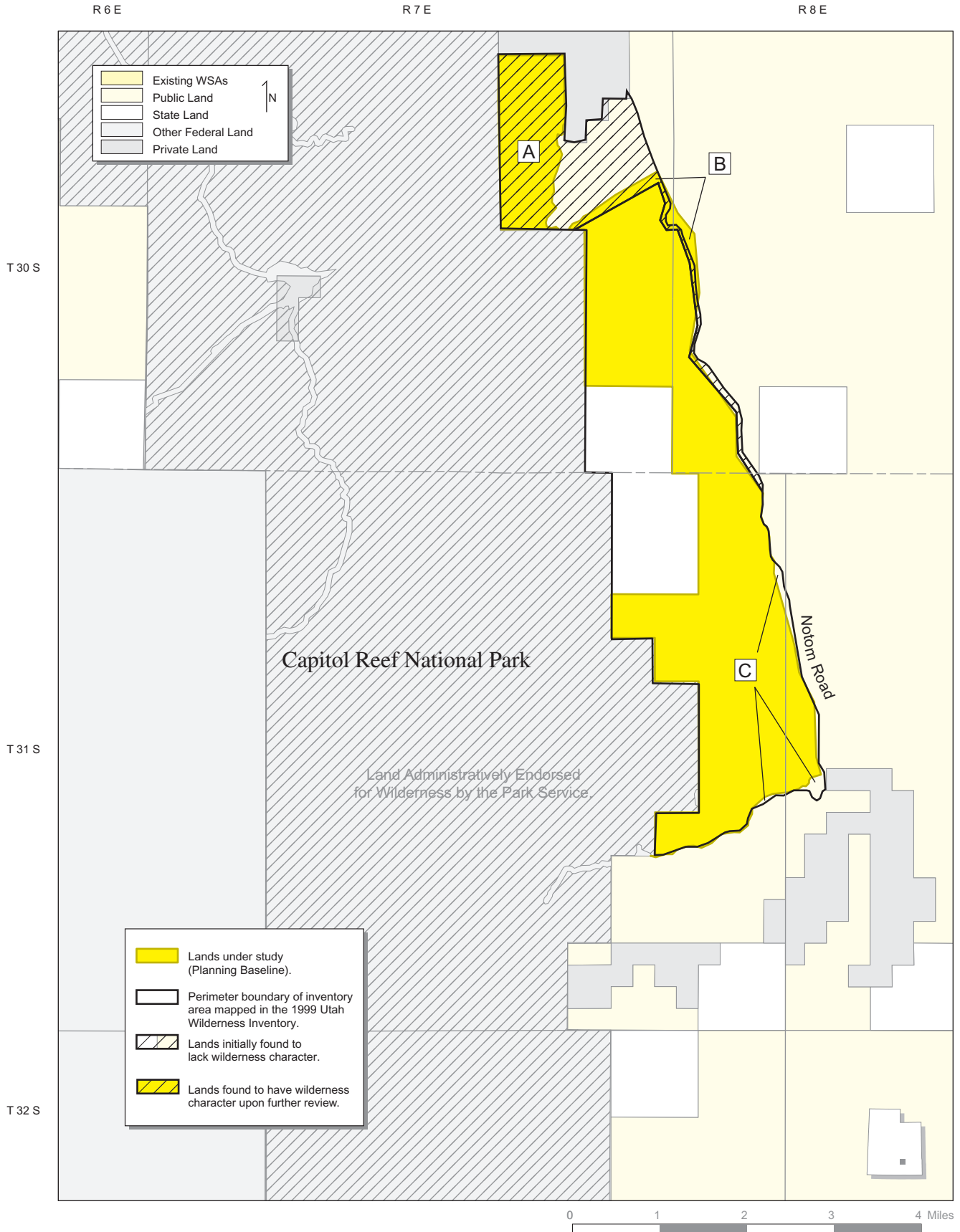
MAP 2.12

# Muddy Creek - Crack Canyon

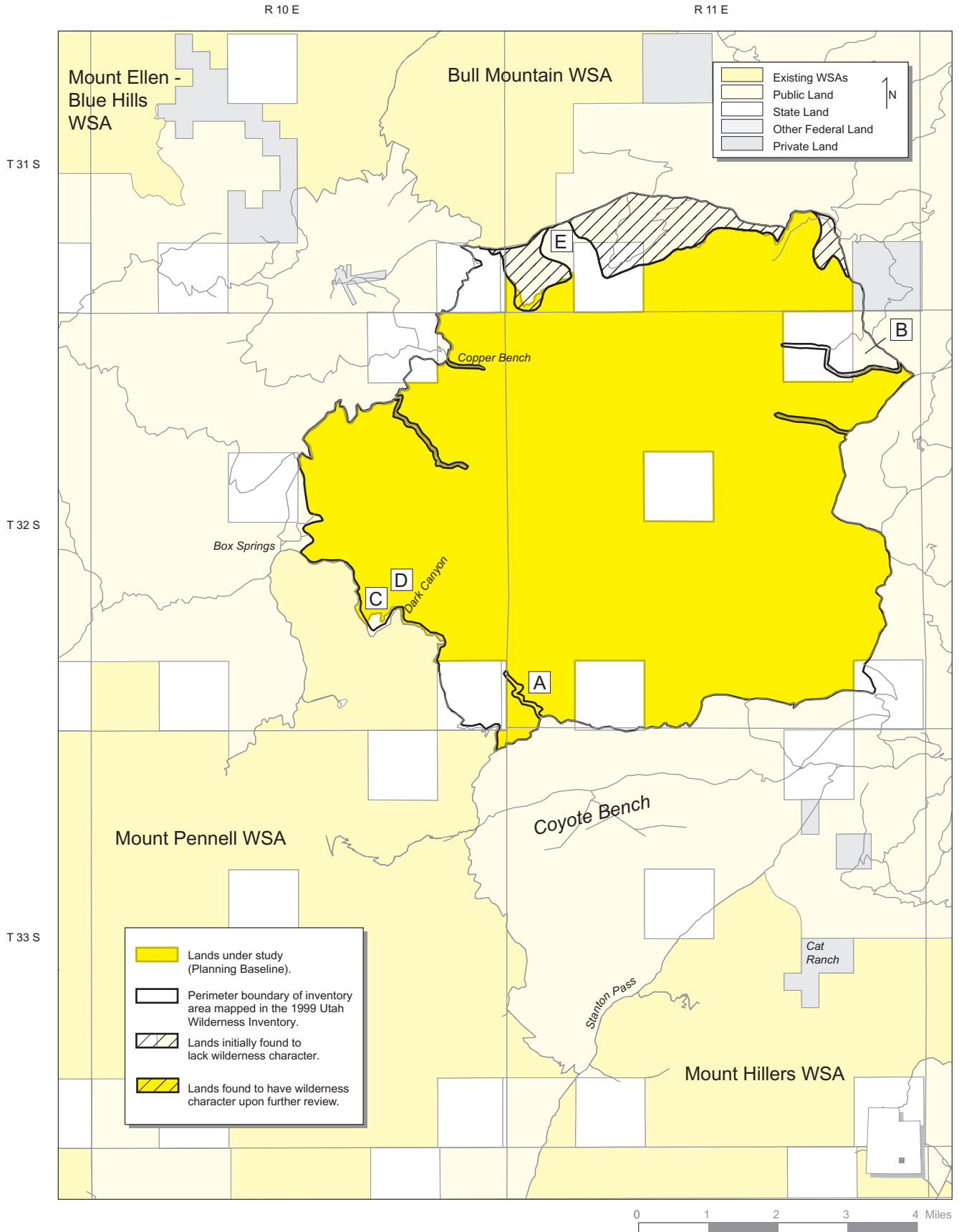
# Baseline Modifications



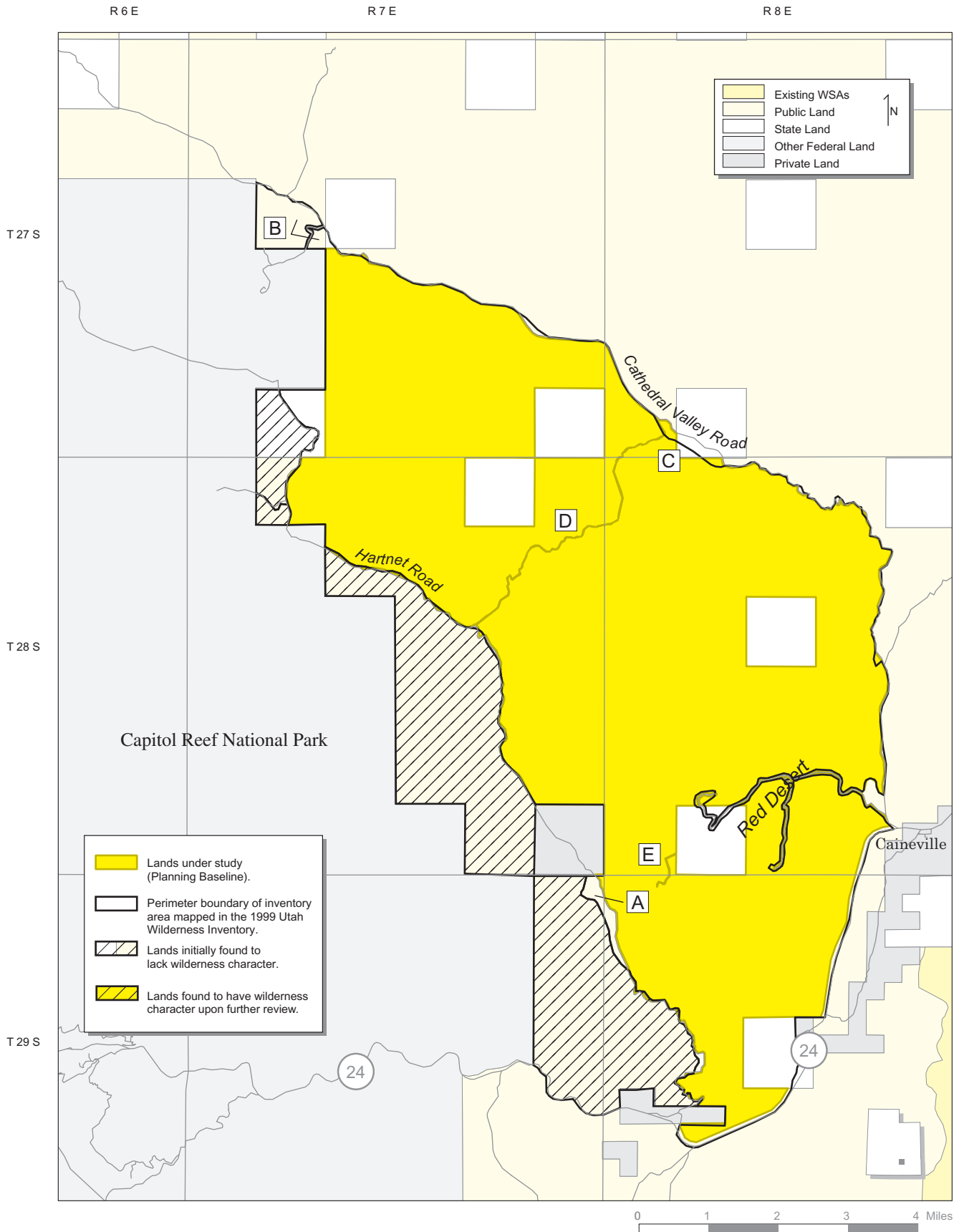
MAP 2.13



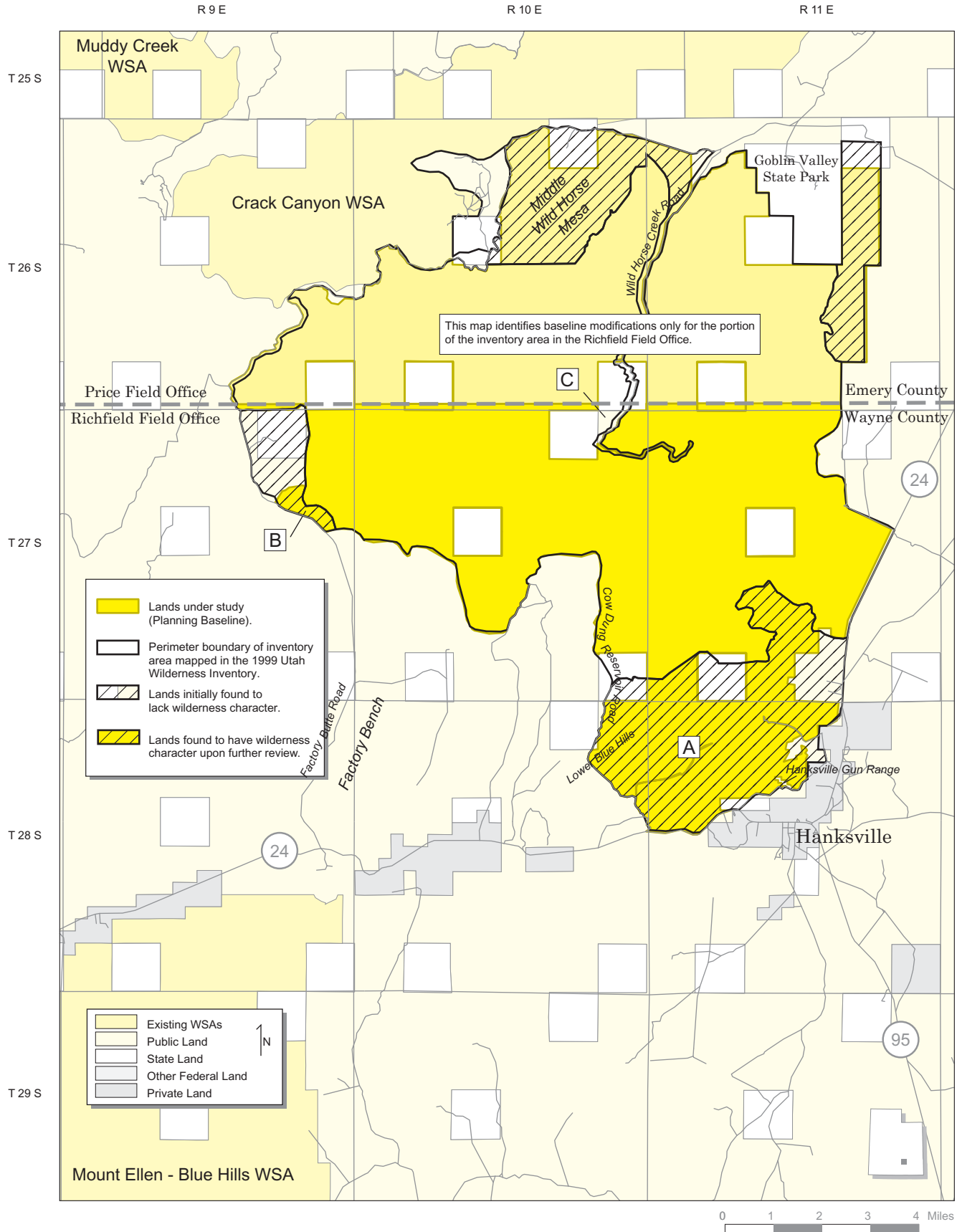
**MAP 2.14**



MAP 2.15



MAP 2.16



MAP 2.17

**Table 2-2: Acreage Summary**

| <b>Inventory Areas</b>     | <b>Wilderness Character Acres Identified in the 1999 Utah Wilderness Inventory</b> | <b>Wilderness Character Acres Forming the Planning Baseline for the Richfield RMP Revision</b> |
|----------------------------|--|--|
| Bull Mountain              | 3,800  | 3,821  |
| Bullfrog Creek             | 29,900   | 29,660   |
| Dirty Devil-French Spring  | 94,400   | 111,179  |
| Dogwater Creek             | 3,500  | 3,466  |
| Fiddler Butte              | 16,720   | 19,731   |
| Fremont Gorge              | 14,600   | 14,941   |
| Horseshoe Canyon South     | 19,800   | 20,665   |
| Jones Bench                | 2,837*   | 2,813  |
| Labyrinth Canyon**         | 12,211   | 12,416   |
| Limestone Cliffs***        | 23,800   | 23,934   |
| Little Rockies             | 24,200   | 23,288   |
| Long Canyon                | 16,500   | 17,109   |
| Mount Ellen-Blue Hills     | 32,600   | 48,283   |
| Mount Hillers              | 1,290  | 1,057  |
| Mount Pennell              | 61,880   | 59,662   |
| Muddy Creek-Crack Canyon** | 63,230   | 61,896   |
| Notom Bench                | 5,500  | 6,392  |
| Ragged Mountain            | 25,900   | 25,487   |
| Red Desert                 | 31,800   | 30,939   |
| Wild Horse Mesa**          | 26,748   | 35,035   |
| <b>Total</b>               | <b>511,216</b>   | <b>551,774</b>   |

\* The acreage figure for Jones Bench was incorrectly calculated in the 1999 Utah Wilderness Inventory

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

\*\*\* Includes 1,060 acres in Emery County/Price Field Office, which is included in this Richfield Revision Document



### **Section III Inventory-Related Scoping Comments and BLM Responses**

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

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

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

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

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

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

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

*How was the inventory completed?*

Specific steps taken to conduct the inventory included the following:

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

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

*How was the inventory documented?*

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

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

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

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

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

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

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

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

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

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

*How were the boundaries of the inventoried lands determined?*

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

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

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

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

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

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

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

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

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

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

(3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.”

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

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

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

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

- "Improved and maintained" - Actions taken physically by people to keep the road open to vehicle traffic. "Improved" does not necessarily mean formal construction. "Maintained" does not necessarily mean annual maintenance.
- "Mechanical means" - Use of hand or power machinery or tools.
- "Relatively regular and continuous use" - Vehicular use which has occurred and will continue to occur on a relatively regular basis. Examples are: access roads for equipment to maintain a stock water tank or other established water sources, access roads to maintained recreation sites or facilities, or access roads to mining claims.

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

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

*How does the BLM apply the wilderness criteria for size?*

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

- Roadless areas with over 5,000 acres of contiguous public lands. State or private lands are not included in making this acreage determination.
- Any roadless island of the public lands of less than 5,000 acres.
- Roadless areas of less than 5,000 acres of contiguous public lands where any one of the following apply:
  - They are contiguous with lands which have been formally determined to have wilderness or potential wilderness values, or
  - It is demonstrated that the area is clearly and obviously of sufficient size as to make practicable its preservation and use in an unimpaired condition, and of a size suitable for wilderness management, or
  - They are contiguous with an area of less than 5,000 acres of other federal lands administered by an agency with authority to study and preserve wilderness lands, and the combined total is 5,000 acres or more.

*How does the BLM apply the wilderness criteria for naturalness?*

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

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

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

*How does BLM apply the wilderness criteria for supplemental values?*

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

*How are sights and sounds outside of inventory areas assessed?*

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

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

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

*Did the inventory designate WSAs?*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Numerous people inventoried 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.



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

BLM specialists thoroughly documented inventory findings. These findings were made available for public review as part of the planning process. As a result of comments received during public scoping, additional field work resulted in some changes to the planning baseline in the Richfield Field Office. Other adjustments, if warranted, will continue to be considered as comments are received throughout this planning process.

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

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

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

The tables that follow provide a synopsis of site-specific comments and responses for eighteen of the twenty inventory areas in the Richfield Field Office (no site-specific comments were received for the Labyrinth Canyon or Long Canyon inventory areas within the lands administered by the Richfield 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 3.18). 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](http://www.ut.blm.gov/wilderness).

| <b>BULL MOUNTAIN</b> (Refer to Map 3.1) |   |   |                  |
|---|---|---|------------------|
| #                                       | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE |
| 1                                       | The BLM did not inventory an area free of intrusions beyond the WSA boundary. | 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> and is on state and private lands. | No               |

| <b>BULLFROG CREEK</b> (Refer to Map 3.2) |  |  |                  |
|--|--|--|------------------|
| #  | PUBLIC COMMENTS  | BLM RESPONSE: INVENTORY REVIEW RESULTS   | BASE LINE CHANGE |
| 1  | The BLM uses the mesa rim as the boundary and excludes an area free of intrusions.                 | This area was found to have no wilderness character because of several stock ponds and vehicle ways which cumulatively impact the area.  | No               |
| 2  | The BLM does not use a significant impact as the boundary and excludes an area free of intrusions. | This area was found to have no wilderness character because of several vehicle ways and an active landfill with wind scattered debris and refuse which cumulatively impact the area. | No               |

**DIRTY DEVIL-FRENCH SPRING** (Refer to Map 3.3)

| # | PUBLIC COMMENTS  | BLM RESPONSE: INVENTORY REVIEW RESULTS   | BASE LINE CHANGE                       |
|---|--|--|--|
| 1 | The BLM wilderness character boundary crosses the natural landscape and excludes un-impacted areas. The boundary should be expanded to the main route to the north.                                  | The boundary in this area follows the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .  | No                                     |
| 2 | BLM fails to inventory an entire roadless area. Part of the BLM boundary follows faint ways and in some places nothing at all. The boundary should be expanded to include the area to the northeast. | The boundary in this area follows the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .  | No                                     |
| 3 | BLM excludes an entire area because of a few seismic lines. These lines are not significant and the boundary should be expanded to include this natural area.  | This area was reexamined and inventory findings of NWC were substantiated on the west side of the area. The area on the east side of route FSM-4 to the WSA boundary was found to possess wilderness character.  | Yes (See "N" on Map 2.3 in Section II) |
| 4 | BLM excludes this entire area because of a few seismic lines. These lines are not significant and the boundary should be expanded to include this natural area.                                      | This area was reexamined and the intrusions identified during the 1996-1999 inventory were found to be non-intrusive. The area was determined to be natural in character and has been added to the planning baseline.  | Yes (See "F" on Map 2.3 in Section II) |
| 5 | The BLM boundary uses an arbitrary section line excluding non-impacted areas. The boundary should be expanded to include this natural area.  | This area was reexamined and the intrusions identified during the 1996-1999 inventory were found to be non-intrusive. The area was determined to be natural in character and has been added to the planning baseline. The area around the cemetery and gravel pit along with a cherry-stemmed road have been excluded.   | Yes (See "G" on Map 2.3 in Section II) |
| 6 | The BLM boundary uses a unmaintained and extremely faint way and an arbitrary line that crosses the natural landscape. The boundary should be moved to a significant impact.                         | This area was reexamined and the intrusions identified during the 1996-1999 inventory were found to be non-intrusive. The area was determined to be natural in character and has been added to the planning baseline.  | Yes (See "H" on Map 2.3 in Section II) |
| 7 | The BLM boundary fails to use a significant impact. The boundary should be expanded to include this area free of any impacts.  | This area was reexamined and the intrusions identified during the 1996-1999 inventory were found to be non-intrusive. The area was determined to be natural in character and has been added to the planning baseline.  | Yes (See "J" on Map 2.3 in Section II) |
| 8 | The BLM cherry-stem is placed beyond an area that is impassable and no road/way form was completed. The cherry-stem should end on top of the rim at Burr Point.                                      | This route was reexamined and the last 0.5 miles was determined to be a vehicle way. This way section did not meet the BLM road definition used for wilderness inventory purposes because it is not maintained and does not receive regular and continuous use. The cherry-stem has been reduced by approximately 0.5 miles and now terminates on top of the mesa. | Yes (See "I" on Map 2.3 in Section II) |

**DIRTY DEVIL-FRENCH SPRING** (Refer to Map 3.3)

| #  | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS   | BASE LINE CHANGE                               |
|----|---|--|--|
| 9  | The BLM boundary fails to use a significant impact. The boundary should be expanded to include this natural area.   | The boundary in this area follows the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .  | No   |
| 10 | BLM used an insignificant route as the boundary and did not do field work on this route or past it. This route has not been significantly maintained and does not meet definition of a road or qualifies as a boundary. | The boundary in this area follows the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .  | No   |
| 11 | BLM used an insignificant route as the boundary and did not do field work on this route or past the old H.R. 1500 boundary. The boundary should be set on a significant impact to include the non-inventoried area.     | The boundary in this area follows the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .  | No   |
| 12 | BLM fails to use a significant route as the boundary, excluding a natural area. The boundary should be set on the route to the south to include non-impaired lands.   | This area was reexamined and the intrusions identified during the 1996-1999 inventory were found to be non-intrusive. The area was determined to be natural in character and has been added to the planning baseline.  | Yes (See "M" on Map 2.3 in Section II)         |
| 13 | BLM did not do any field work or a road/way form on an insignificant route that was cherry-stemmed. The cherry-stem should be removed. (This could be a mapping error.)   | <p>This route, which leads to Two Pipe Spring, was reexamined and identified as DD/FS-A. DD/FS-A does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes because it is not maintained. This vehicle way was determined to be substantially noticeable for the first 6 miles because it is very evident and receives heavy use. The last 0.3 mile section was determined to be substantially unnoticeable and the cherry-stem has been removed from this portion of the way.</p> <p>Another route, which also leads to Two Pipe Spring, was reexamined and identified as DD/FS-B. This unmaintained route was also determined to be a vehicle way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purpose. DD/FS-B was determined to be a substantially noticeable way because it receives heavy use and is very evident. A cherry-stem has been added along this substantially noticeable way.</p> | Yes (See "A" and "E" on Map 2.3 in Section II) |
| 14 | There is a single track (no longer 4WD accessible because of rock falls) from the top of the Big Ridge down to the North Hatch Road that should be cherry-stemmed.  | This route in sec(s) 13, 14 T.31 S., R 15 E was identified as being blocked by a landslide and showed no signs of vehicle use. The route is also signed as closed by the local BLM office.   | No   |

| <b>DIRTY DEVIL-FRENCH SPRING</b> (Refer to Map 3.3) |   |   |                  |
|---|---|---|------------------|
| #   | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE |
| 15  | The Poison Spring Canyon Road and the North and South Hatch Canyons Roads should all be cherry-stemmed. There are also several spur mine roads off the Poison Spring Road and one road just north of the river crossing that should be excluded also. | The Poison Spring Canyon Road and the North Hatch Canyon Road are not within the inventory area. The South Hatch Canyon Road is within the Fiddler Butte WSA and is not subject to this planning process. The routes north of the river crossing are noted as being blocked by landslides or other obstacles. | No               |

| <b>DOGWATER CREEK</b> (Refer to Map 3.4) |  |   |  |
|--|--|---|--|
| #  | PUBLIC COMMENTS  | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE                       |
| 1  | BLM has excluded a small parcel that is adjacent to Capitol Reef National Park which contains lands that are administratively endorsed for wilderness by the Park Service. | The intrusions identified in the North Coleman Canyon area of the inventory area were initially found to be non-substantial impacts and the area was found to have wilderness character. The area is contiguous to lands administratively endorsed for wilderness by National Park Service. The boundary has been adjusted to correct this mapping error. | Yes (See "A" on Map 2.4 in Section II) |

| <b>FIDDLER BUTTE</b> (Refer to Map 3.5) |   |   |  |
|---|---|---|--|
| #                                       | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE                       |
| 1                                       | The BLM boundary has excluded non-impacted areas with some intrusions. The intrusions are few and substantially unnoticeable. The boundary should be expanded to include these areas. | This area was reexamined and approximately 2,201 acres were determined to be natural in character and have been added to the planning baseline. The rest of the area contains a corral and troughs that are a cumulative impact to the naturalness of the area. | Yes (See "A" on Map 2.5 in Section II) |
| 2                                       | The BLM boundary has excluded non-impacted areas with some intrusions. The intrusions are few and substantially unnoticeable. The boundary should be expanded to include these areas. | This area was reexamined and the boundary has been moved to a more substantial impact, which has resulted in the addition of approximately 962 acres to the area with wilderness character.   | Yes (See "B" on Map 2.5 in Section II) |
| 3                                       | A small parcel of non-impacted land contiguous to Glen Canyon National Recreation Area was not inventoried and should be included in the lands with wilderness character.             | This area is entirely on state land and is not part of the planning baseline.   | No                                     |

| <b>FIDDLER BUTTE</b> (Refer to Map 3.5) |   |   |                  |
|---|---|---|------------------|
| #                                       | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE |
| 4                                       | A maintained road in sec. 6, T. 32 S., R. 13 E. should be cherry-stemmed. | This route was field checked and determined to be a seismic line. The route indicated by the comment is actually in sec. 1, T. 32 S., R. 12 E and was cherry-stemmed during the 1999 inventory. | No               |

| <b>FREMONT GORGE</b> (Refer to Map 3.6) |  |   |  |
|---|--|---|--|
| #                                       | PUBLIC COMMENTS  | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE                       |
| 1                                       | A road/way form was not completed for the cherry-stem on Beas Lewis Flat. The area around Torrey Allotment Reservoir No.2 is natural and should be part of the wilderness. | This route was re-evaluated, identified as No. 13 and part of it was determined to be a road, with the remaining segment to the reservoir being a substantially noticeable way. The substantial way in conjunction with the reservoirs is a cumulative impact. This area is not natural in character.           | No                                     |
| 2                                       | A road/way form was not completed for the route toward Wide Hollow Reservoir. The route does not meet the BLM road definition and should not be cherry-stemmed.            | This route is located in an area that has been dropped from the planning baseline due to state section severing.  | No                                     |
| 3                                       | BLM used an insignificant impact as the boundary and an entire roadless area in the vicinity of Sulphur Creek was not inventoried.   | The area around Sulphur Creek is outside the H.R. 1500 boundary that was the focus of the <i>1999 Utah Wilderness Inventory</i> .   | No                                     |
| 4                                       | BLM used insignificant impacts as the boundary and has excluded areas that have recovered to the degree of being significantly unnoticeable.                               | These areas were re-evaluated and an area approximately 939 acres in size east of Wide Hollow was found to be natural in character and has been added to the planning baseline. The rest of the areas were determined not to be natural in character because of cross-country travel and wood cutting activity. | Yes (See "C" on Map 2.6 in Section II) |

| <b>HORSESHOE CANYON SOUTH</b> (Refer to Map 3.7) |   |   |   |
|--|---|---|---|
| #  | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE                              |
| 1  | <p>The BLM did not complete a road/way form for a vehicle route that should not be cherry-stemmed in section 34, T. 27 S.; R.16 E.</p> <p>Another comment stated the cherry-stem should be extended to allow for vista view access.</p> | <p>This route, identified as Way # 1, was examined and determined to be a road for the initial 0.9 miles. The remaining 0.4 mile segment to a drill hole does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes, but is substantially noticeable. The cherry-stem has been extended to include the drill hole.</p> | <p>Yes (See "A" on Map 2.7 in Section II)</p> |
| 2  | <p>The BLM did not complete a road/way form for a vehicle route that should not be cherry-stemmed.</p> <p>Another comment stated the cherry-stem should be extended to allow for vista view access.</p>                                 | <p>This route, identified as Way # 2, was examined and determined to be substantially unnoticeable. Way #2 does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes because it is not maintained and does not receive regular and continuous use. The cherry-stem along this vehicle way has been removed.</p>       | <p>Yes (See "B" on Map 2.7 in Section II)</p> |
| 3  | <p>The BLM uses a fence line, which is not a significant impact, as the boundary and excludes non-impacted areas. The boundary should be expanded to include the natural areas.</p>   | <p>This area was examined and the fence line was found not to be a significant intrusion. The boundary has been expanded to the Hans Flat and Antelope Valley Roads.</p>  | <p>Yes (See "C" on Map 2.7 in Section II)</p> |

| <b>JONES BENCH</b> (Refer to Map 3.8) |   |   |                  |
|---------------------------------------|---|---|------------------|
| #                                     | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE |
| 1                                     | <p>Located on the northern border of the inventory area is a livestock corral, pond, and fenced State Trust Lands section with a stockyard for storing hay.</p>   | <p>The corral and pond are in an area initially found to lack wilderness character. State lands have been dropped from the planning baseline.</p>   | <p>No</p>        |
| 2                                     | <p>There are two pipelines, stretching for approximately 19 miles, which connect a network of springs to watering troughs. Continued access to the springs and pipelines is crucial. Routine maintenance requires the use of mechanical equipment in and out of the area.</p> | <p>This area was evaluated and the pipelines were found to be unintrusive to the naturalness of the area.</p>   | <p>No</p>        |
| 3                                     | <p>On the western boundary of the inventory area is a Class D road. This road has been recognized by the Federal Government as a road, as evidenced by a sign placed there marking the boundary of the National Park.</p>   | <p>This route was reexamined and identified as JB-1. JB-1 is primarily found in a wash and is subject to flash flooding. JB-1 was determined to be a way because it is not maintained and does not receive regular and continuous use. The marking of the National Park boundary does not determine that the route is a road.</p> | <p>No</p>        |

**LIMESTONE CLIFFS\*** (Refer to Map 3.9)

| # | PUBLIC COMMENTS  | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE                       |
|---|--|---|--|
| 1 | BLM uses an insignificant impact as the boundary, and the boundary should be expanded.   | Upon further review and reconsideration, the BLM found a portion of this area to be natural in character. The boundary now follows the edge of disturbance, excluding an area impacted from a corral, vehicle route, coal stockpiling, and old foundations.   | Yes (See "A" on Map 2.8 in Section II) |
| 2 | BLM uses an insignificant impact as the boundary, and the boundary should be expanded.   | This area is outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .  | No                                     |
| 3 | The inventory area contains private lands and roads used for ranching purposes. The operators are in and out of the area on a daily basis, moving livestock, irrigating crops, and protecting their operations. Simply cherry-stemming the private properties is not enough. | The private lands found within this inventory area have been excluded, along with routes used to access them.   | No                                     |
| 4 | This area contains numerous access roads used by recreationists and livestock operators to access stock ponds.   | Access to this area is prevented because of a locked gate along a route located on private land.  | No                                     |
| 5 | BLM has not included the small area to the south of the section line. The area is adjacent to a Forest Service roadless area, and thus is not a narrow finger.   | The boundary at this location was incorrectly portrayed in the <i>1999 Utah Wilderness Inventory</i> . This parcel has since been included in the area with wilderness character to correct a digitizing error.   | Yes (See "B" on Map 2.8 in Section II) |
| 6 | A cherry-stem located on the western side of the inventory area was not fully documented.  | This route, identified by the BLM as LC-2, was examined and determined to be a vehicle way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. LC-2 is not maintained, does not receive regular and continuous use, and is washed out. The cherry-stem along this vehicle way has been removed. | Yes (See "C" on Map 2.8 in Section II) |
| 7 | A vehicle route was not identified and inventoried by the BLM, the route should be determined to be a road.  | This route was inventoried, identified as LC-3 and determined to be a way. The access from Solomon Creek is almost non-existent and overgrown. The way becomes visible when it starts climbing a ridge. Access to the route is blocked by a privately locked gate near the boundary of the inventory area.  | No                                     |

\* Includes 1,060 acres in Emery County/Price Field Office, which is included in this Richfield Revision Document



| <b>LITTLE ROCKIES</b> (Refer to Map 3.10) |   |   |  |
|---|---|---|--|
| #   | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE                       |
| 1   | The BLM has identified Road #2 as a road and cherry-stemmed it. The road/way form shows the route is not a road. The cherry-stem should be removed. | Road #2, which leads to Colt Spring, was examined and determined to be a substantially unnoticeable vehicle way. Road #2 does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes because it is not maintained and does not receive regular and continuous use. The cherry-stem along this vehicle way has been removed. | Yes (See "A" on Map 2.9 in Section II) |

| <b>MOUNT ELLEN-BLUE HILLS</b> (Refer to Map 3.11) |   |   |   |
|---|---|---|---|
| #   | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE                        |
| 1   | There is a ditch right-of-way included within the inventory area in sec(s). 7, 17, 18, 20 and 29 T. 30 S., R. 10 E.   | The ditch/pipeline right-of-way was initially excluded from the area with wilderness character and is not part of the planning baseline. Segments of this right-of-way that may extend into the existing Mount Ellen-Blue Hills WSA will not be addressed in this planning process.   | No                                      |
| 2   | The BLM uses a faint route as the boundary on the west side of the inventory area. The boundary should be expanded to include a large tract of non-impacted land. | This area was reevaluated and a portion was determined to be natural in character and has been added to the planning baseline. The boundary now follows the edge of a significant impact.   | Yes (See "A" on Map 2.10 in Section II) |
| 3   | The BLM uses the cliff line as the boundary excluding non-impacted lands to the north. The boundary should be expanded to include natural areas to the north.     | This area was reevaluated and a portion was determined to be natural in character and has been added to the planning baseline. The boundary now follows the edge of a significant impact.   | Yes (See "B" on Map 2.10 in Section II) |
| 4   | The BLM uses arbitrary section lines as the boundary, the boundary should be moved to include non-impacted lands.   | The area extending east of the Mount Ellen-Blue Hills WSA boundary in the vicinity of Oak Creek was found to be substantially impacted by numerous seismic lines and other visual intrusions. The area was determined not to possess wilderness character.  | No                                      |
| 5   | The BLM uses a insignificant impact as the boundary excluding non-impacted lands. The boundary should be expanded to include natural areas.                       | The area extending east of the Mount Ellen-Blue Hills WSA boundary in the vicinity of Sweetwater Creek and Oak Creek Ridge was found to be substantially impacted by numerous seismic lines, vehicle tracks, stock ponds, pipelines and other visual intrusions. The area was determined not to possess wilderness character. | No                                      |

**MOUNT ELLEN-BLUE HILLS** (Refer to Map 3.11)

| # | PUBLIC COMMENTS  | BLM RESPONSE: INVENTORY REVIEW RESULTS                          | BASE LINE CHANGE                        |
|---|--|---|---|
| 6 | The BLM uses the south bank of the Fremont River as the boundary. The boundary should be moved to the north bank to protect the riparian area. | This was an administrative error that has since been corrected. | Yes (See "C" on Map 2.10 in Section II) |

**MOUNT HILLERS** (Refer to Map 3.12)

| # | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS   | BASE LINE CHANGE |
|---|---|--|------------------|
| 1 | The BLM uses an insignificant impact as the boundary excluding non-impacted lands. The boundary should be expanded to a substantial impact to include non-impacted lands. | This area in the vicinity of Speck Creek is outside the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .  | No               |
| 2 | The BLM uses an insignificant impact as the boundary excluding non-impacted lands. The boundary should be expanded to a substantial impact to include non-impacted lands. | This area in the vicinity of Trail Canyon is outside the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> . | No               |

**MOUNT PENNELL** (Refer to Map 3.13)

| # | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS  | BASE LINE CHANGE                        |
|---|---|---|---|
| 1 | The BLM has cherry-stemmed a route that was not inventoried. This route is washed out and impassible and the cherry-stem should be removed.   | This route, identified as MP-A, was examined and determined to be a vehicle way. MP-A does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes because it is not maintained and does not receive regular or continuous use. The cherry-stem along this vehicle way has been removed. | Yes (See "A" on Map 2.12 in Section II) |
| 2 | The BLM depended on aerial examination of this route which was identified as a road. The route is not maintained and extremely faint beyond the well. The cherry-stem should stop at the well and the bound ary expanded to the east. | This area was reevaluated and the pipeline and associated maintenanc e way were determined to be substantially noticeable and the edge of disturbance. The area to the east on Cow Flat was found to be unnatural in character because of numero us intrusions.   | No                                      |

| <b>MUDDY CREEK- CRACK CANYON*</b> (Refer to Map 3.14) |   |  |                  |
|---|---|--|------------------|
| #   | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS   | BASE LINE CHANGE |
| 1   | BLM uses an insignificant route as the boundary, and the boundary should be expanded to include the area to the east. | The boundary follows the edge of disturbance separating the inventory area from lands lacking wilderness character due to impacts from numerous ways and OHV activity. | No               |

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

| <b>NOTOM BENCH</b> (Refer to Map 3.15) |   |  |   |
|--|---|--|---|
| #                                      | PUBLIC COMMENTS   | BLM RESPONSE: INVENTORY REVIEW RESULTS   | BASE LINE CHANGE                        |
| 1                                      | The BLM has excluded a portion of the unit which is contiguous to lands within Capitol Reef National Park that are administratively endorsed for wilderness. This portion should be included in the area with wilderness character. | This area was initially identified as having wilderness character and has been added to the planning baseline to correct a digitizing error. | Yes (See "A" on Map 2.14 in Section II) |

| <b>RAGGED MOUNTAIN</b> (Refer to Map 3.16) |  |  |   |
|--|--|--|---|
| #  | PUBLIC COMMENTS  | BLM RESPONSE: INVENTORY REVIEW RESULTS   | BASE LINE CHANGE                        |
| 1  | The BLM uses an insignificant route as the boundary. The boundary should be moved to include non-impaired lands in the area with wilderness character. | This area is located outside the boundary of the 1999 <i>Utah Wilderness Inventory</i> .   | No                                      |
| 2  | The BLM did not complete the field work on a cherry-stem route that is nearly impossible to access. The cherry-stem should be removed from the route.  | This route, identified as RM-1, was reexamined and determined to be a non-substantial way. RM-1 does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes because it is not maintained and does not receive regular and continuous use. The cherry-stem along this vehicle way has been removed. | Yes (See "A" on Map 2.15 in Section II) |

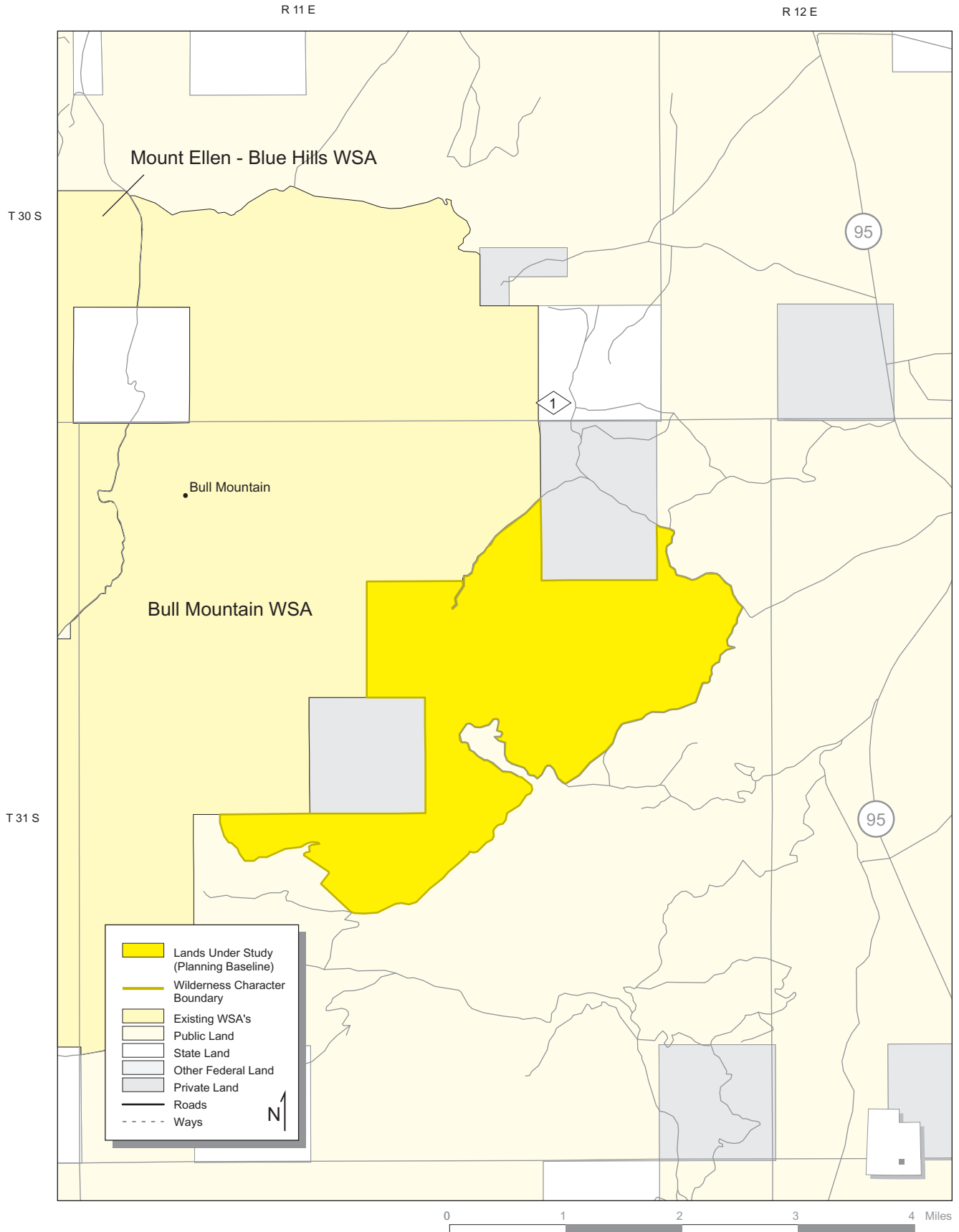
**RED DESERT** (Refer to Map 3.17)

| # | PUBLIC COMMENTS  | BLM RESPONSE: INVENTORY REVIEW RESULTS   | BASE LINE CHANGE                         |
|---|--|--|--|
| 1 | There appears to be a mapping error in the placement of the boundary around North Blue Flats. The wildemess character boundary of extends over an established road.  | This is a mapping error which has since been corrected.  | Yes (See "A " on Map 2.16 in Section II) |
| 2 | Two portions of Unit 2 which are contiguous to Capitol Reef National Park roadless areas should be identified as having wilderness character.  | The National Park Service contiguous lands are not administratively endorsed for wilderness designation at this time. The two portions of Unit 2 do not meet the size criteria to be considered as stand alone inventory units, and therefore, do not have wilderness character.   | No                                       |
| 3 | There is a road that was not fully documented by the BLM that provides access to Andrew Water and another to North Hartnet Pond. These roads are maintained by the livestock operator and should be identified as roads. | This area was examined and access to the non-functioning pond is within a wash, no established vehicle route was found.  | No                                       |
| 4 | There are two roads that lead to Guys Pond # 1 and #2 that should be identified as roads.  | These routes, identified as RD-1 and RD-1a, were examined and determined to be vehicle ways because they do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes because they are not maintained.  | No                                       |
| 5 | There is a road to Willow Seep that is used to maintain a fence. The road should be kept open to provide access for this purpose.  | This route, identified as Hartnet Draw Way #1, was determined to be a road for a part of its length. The remaining segment was determined to be a substantial way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. This route bisects the unit and separates it into two parts. | Yes (See "D " on Map 2.16 in Section II) |
| 6 | There is a route that was not fully documented by BLM that extends from Seismo Spring to Meeks Pond and the Hartnet Draw Road.   | This route was reexamined and only a few segments of the route could be identified at the start and end. The route was determined to be a cross-country track that is almost non existent.   | No                                       |

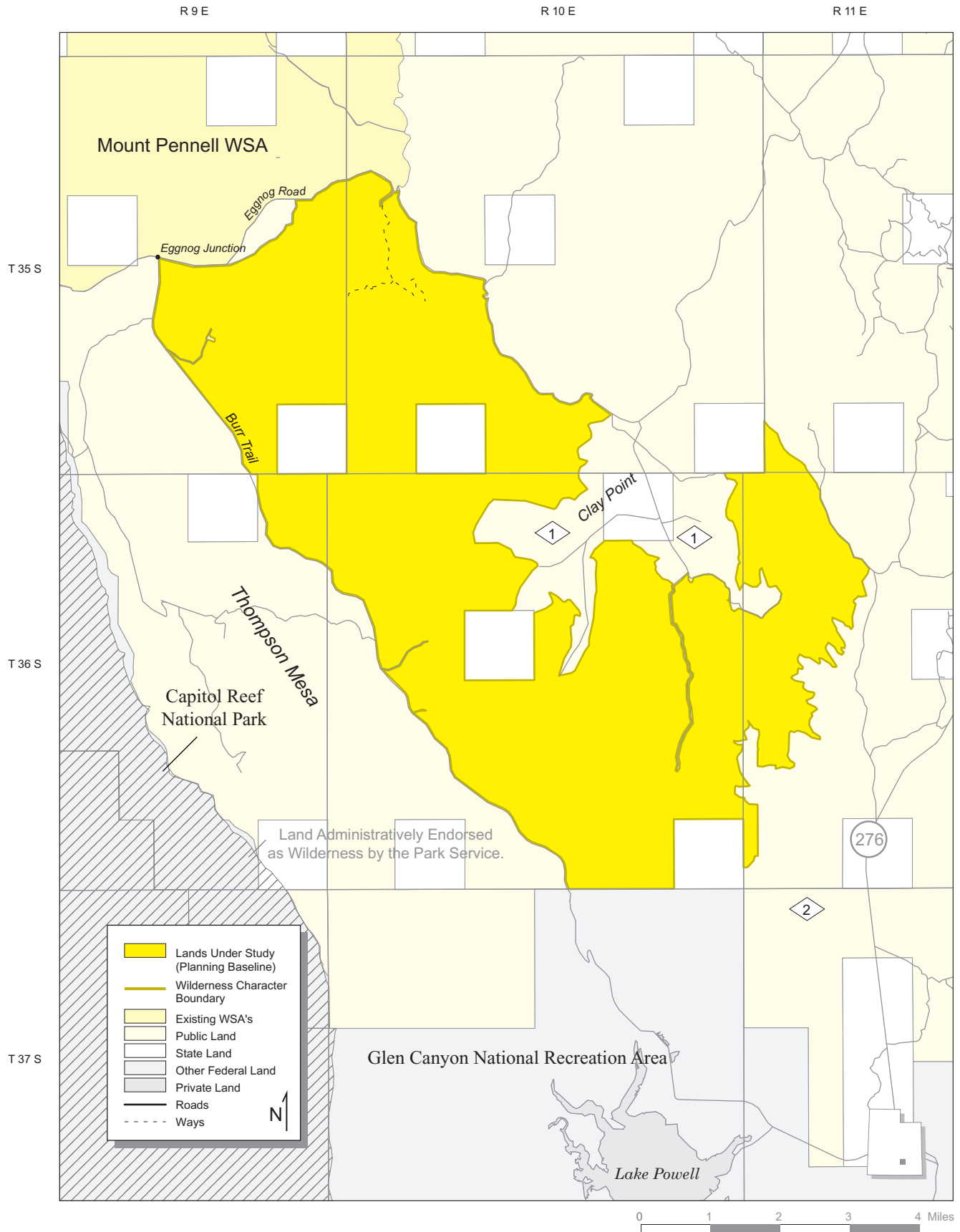
**WILD HORSE MESA\*** (Refer to Map 3.18)

| # | PUBLIC COMMENTS  | BLM RESPONSE: INVENTORY REVIEW RESULTS   | BASE LINE CHANGE                        |
|---|--|--|---|
| 1 | BLM's use of aerial survey methodology has overstated the impacts of widely scattered ways and seismic lines. The boundary excludes areas of naturalness. Significant roads have no road/way forms (N. Pinto Hills).                       | The southern portion of the inventory area was reexamined and most of the area was determined to be natural in character and has been added to the planning baseline. The boundary excludes the impacts associated with the Hanksville Airport, Nimrods East Gun Club shooting range, two substantially noticeable ways, and an OHV play area. | Yes (See "A" on Map 2.17 in Section II) |
| 2 | The BLM failed to inventory the area that includes the Skyline Rim and Lower Blue Hills. The boundary the BLM uses is a faint vehicle track that is not a significant impact and a cliff line. The area is natural and should be included. | The area that includes the Skyline Rim and the Lower Blue Hills is beyond the previous H.R. 1500 legislative boundary that was the focus of the <i>1999 Utah Wilderness Inventory</i> .  | No                                      |
| 3 | BLM used a section line as the boundary and did not inventory natural lands to the south and west. Move the boundary to include the areas of naturalness.  | This area was reexamined and most of the area was found to be impacted by mining activity. The southern portion of the area was determined to be natural in character and has been added to the planning baseline.   | Yes (See "B" on Map 2.17 in Section II) |
| 4 | There is a road to Cow Dung Reservoir that was not identified by the BLM.  | This route was examined and the route and reservoir were determined not to be within the inventory area.   | No                                      |
| 5 | There is a road that is used to access a well that is the water source for livestock that should be kept open for this purpose.  | This route forms the boundary of the lands found to have wilderness character and is not part of the planning baseline.  | No                                      |

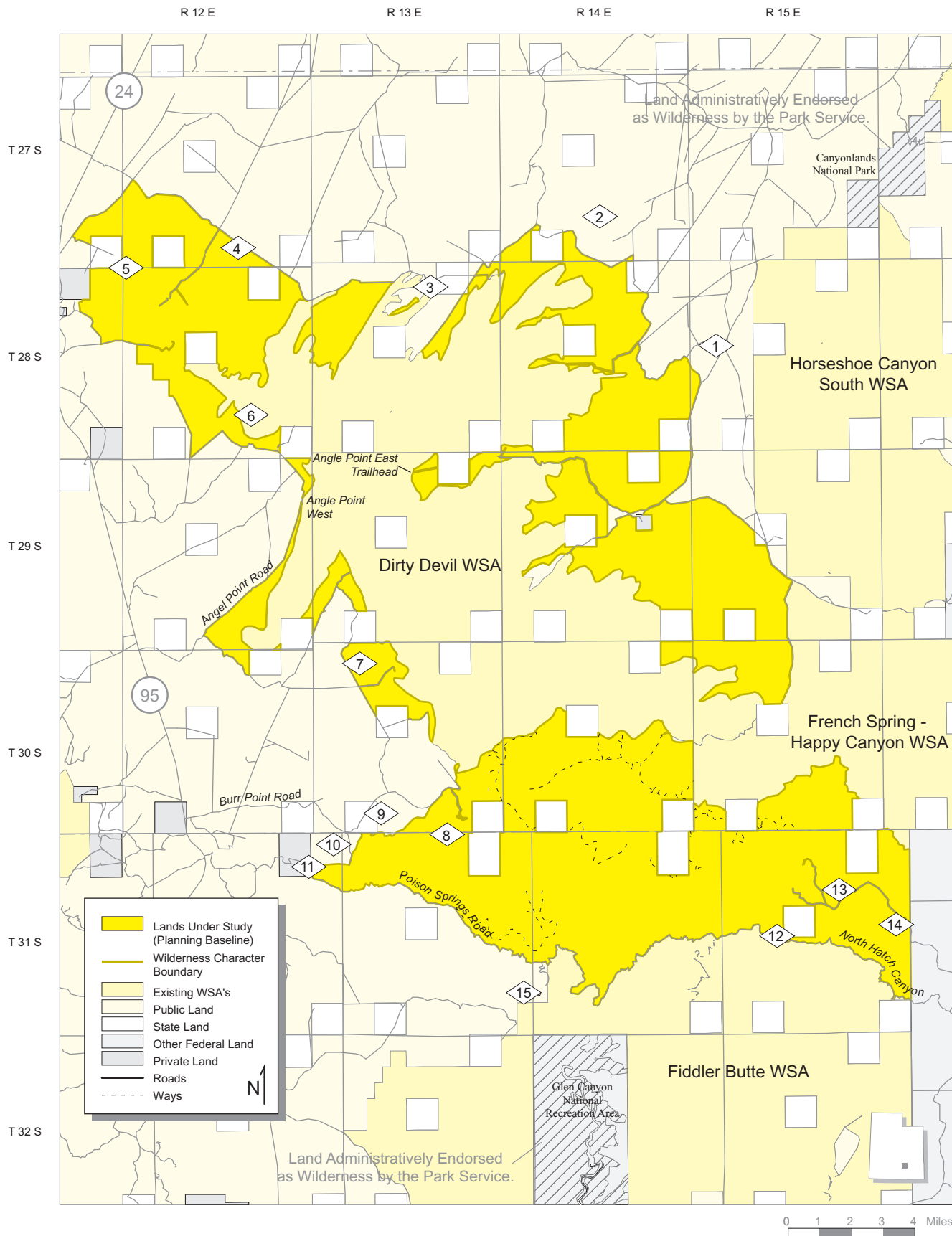
\* This document identifies public comments only for that portion of the inventory area administered by the Richfield Field Office.



MAP 3.1

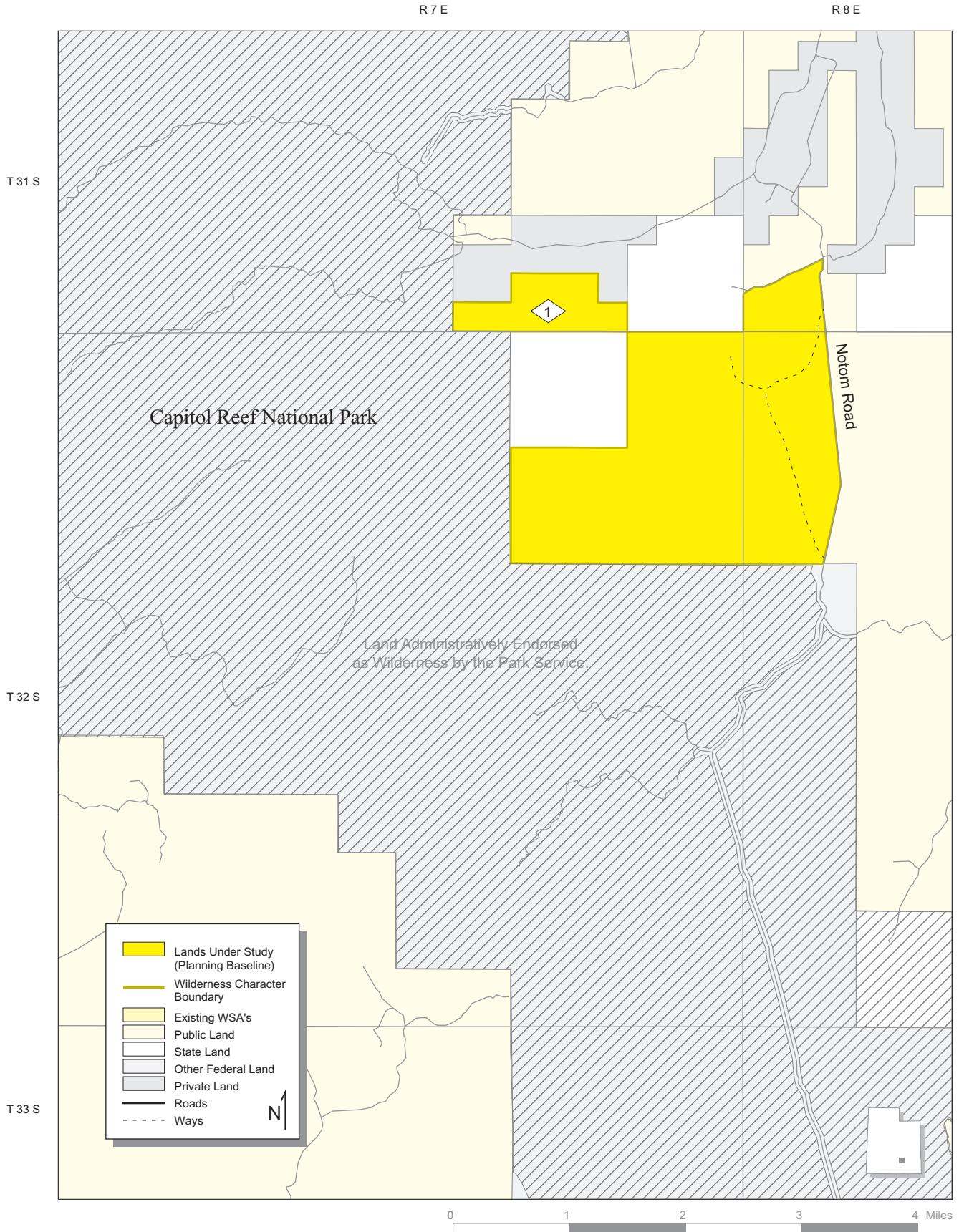


**MAP 3.2**

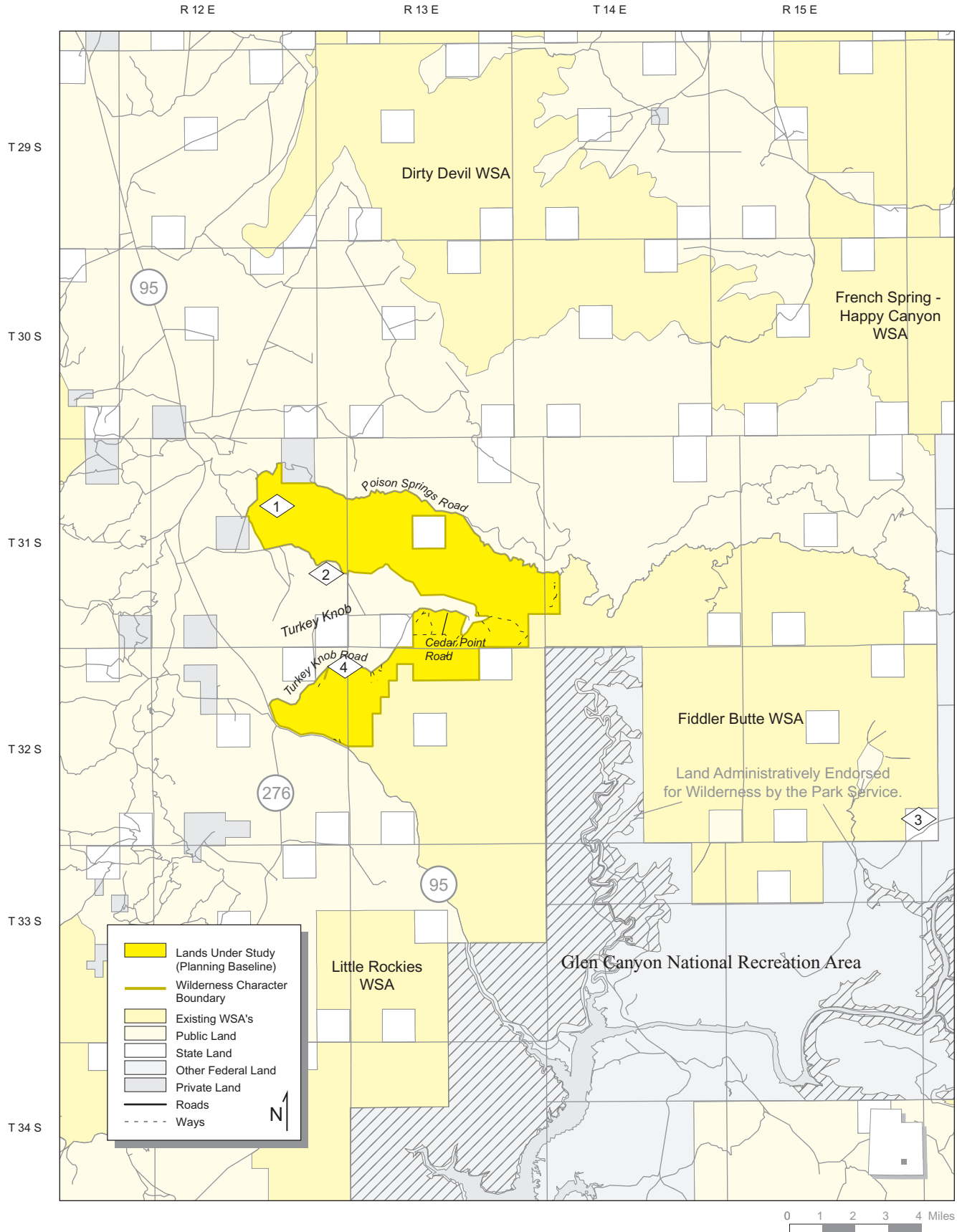


**MAP 3.3**

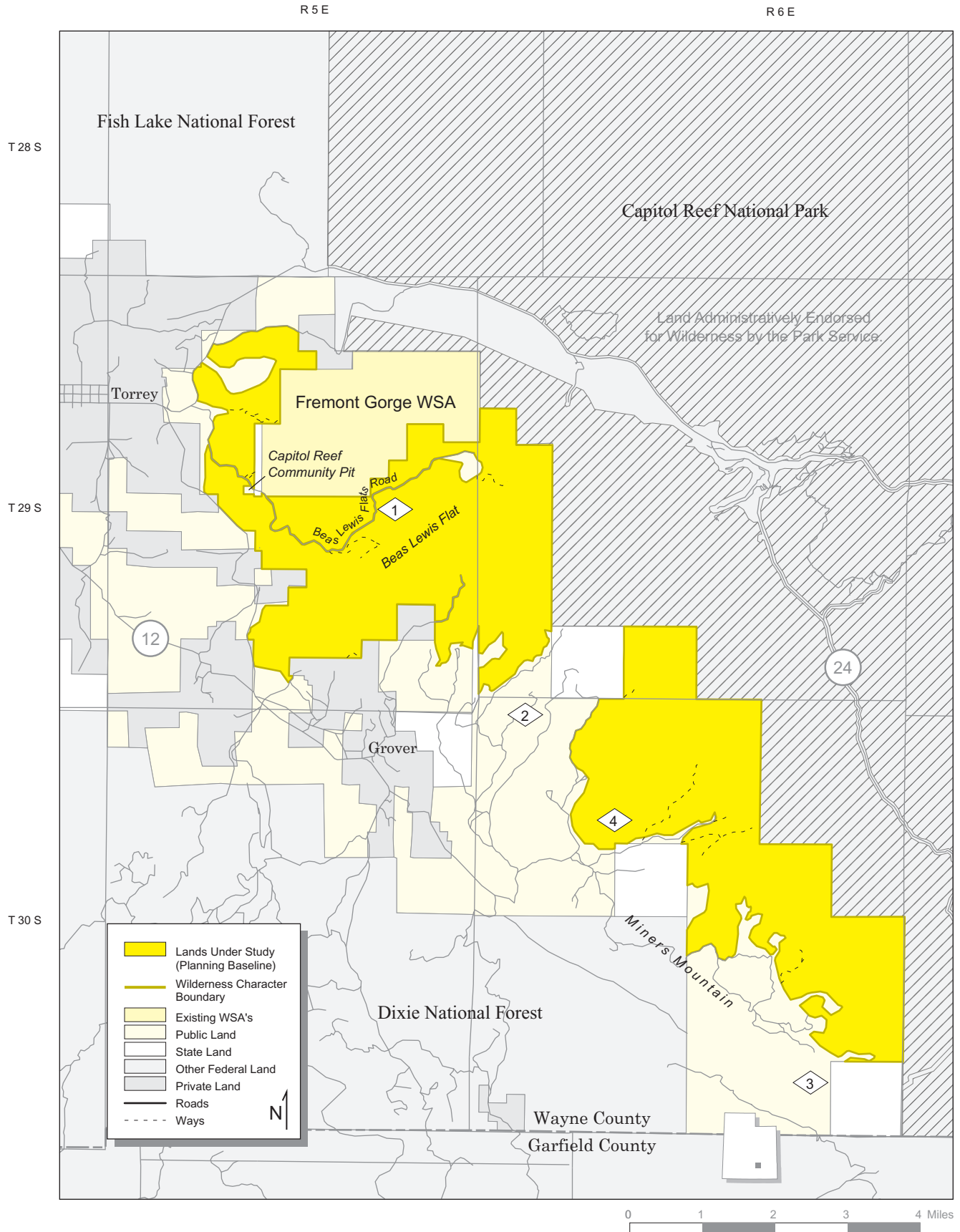




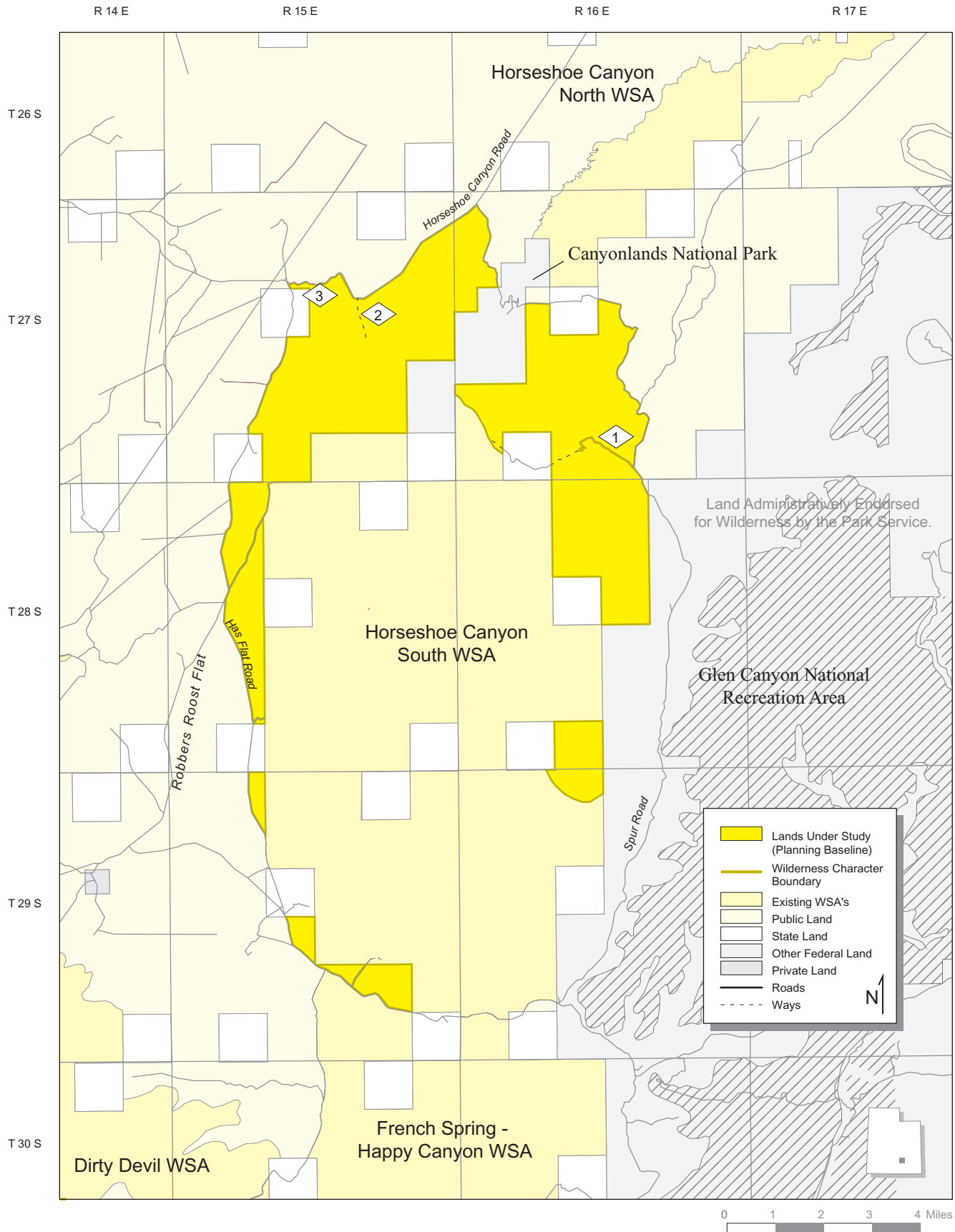
MAP 3.4



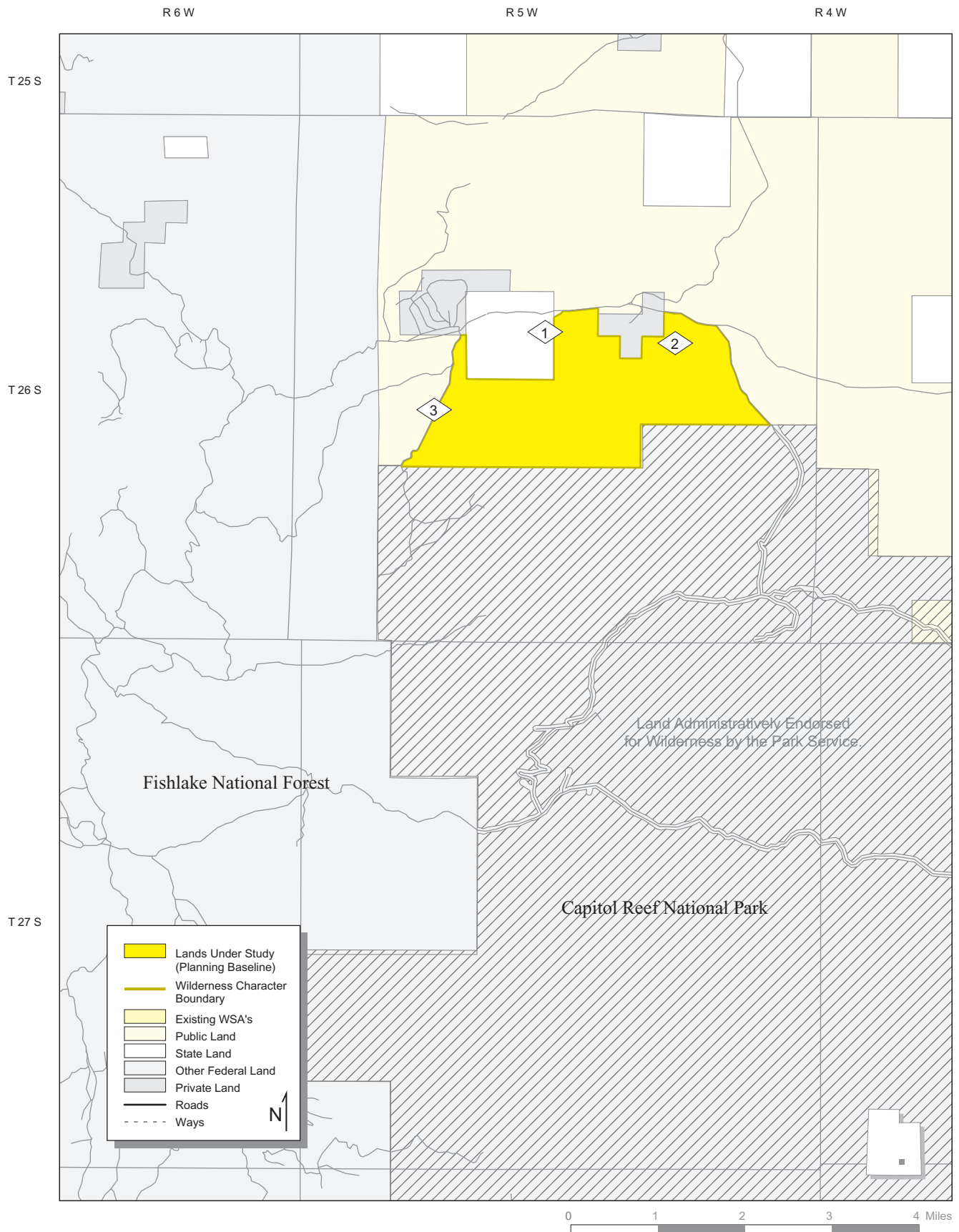
**MAP 3.5**



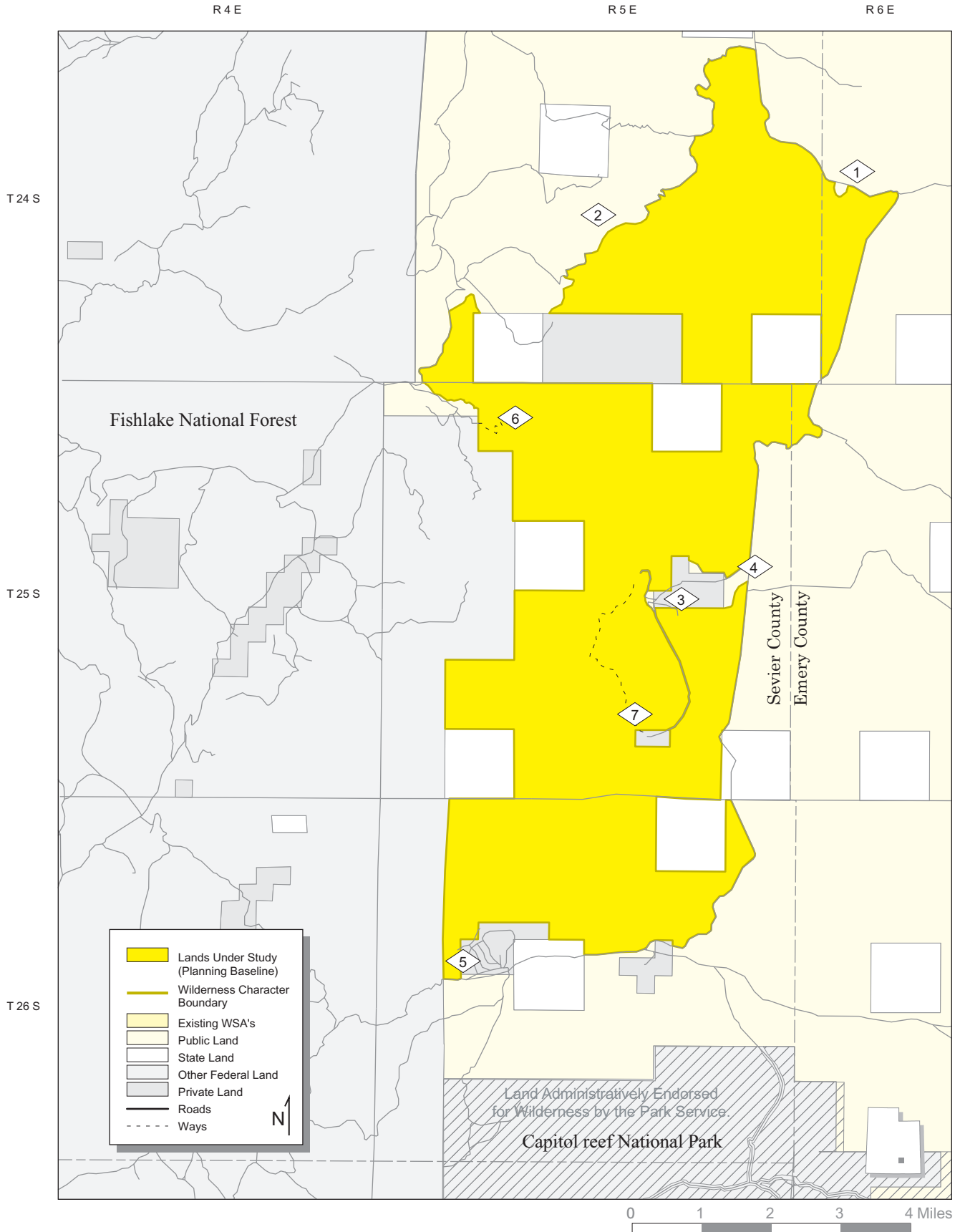
**MAP 3.6**



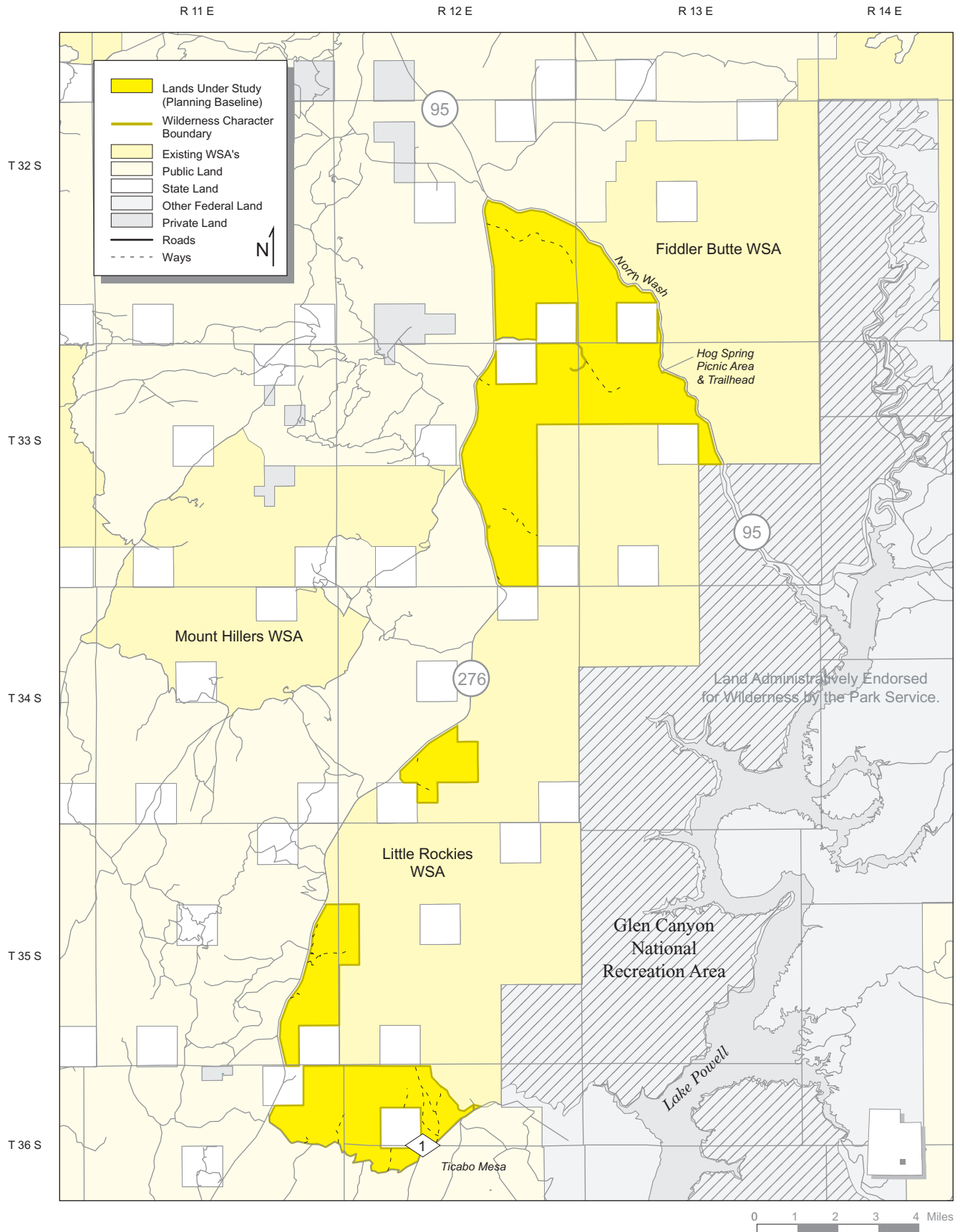
MAP 3.7



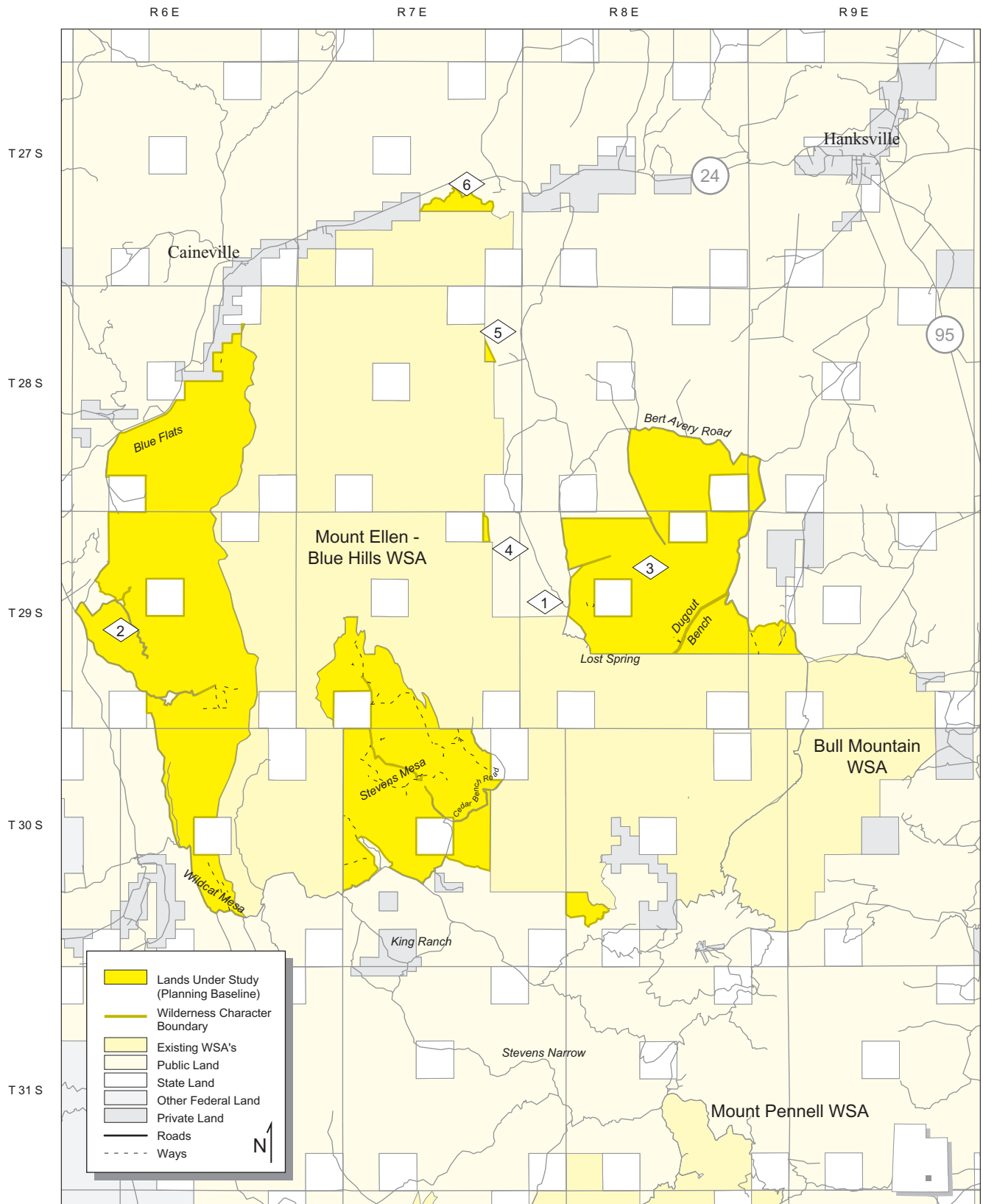
MAP 3.8



MAP 3.9

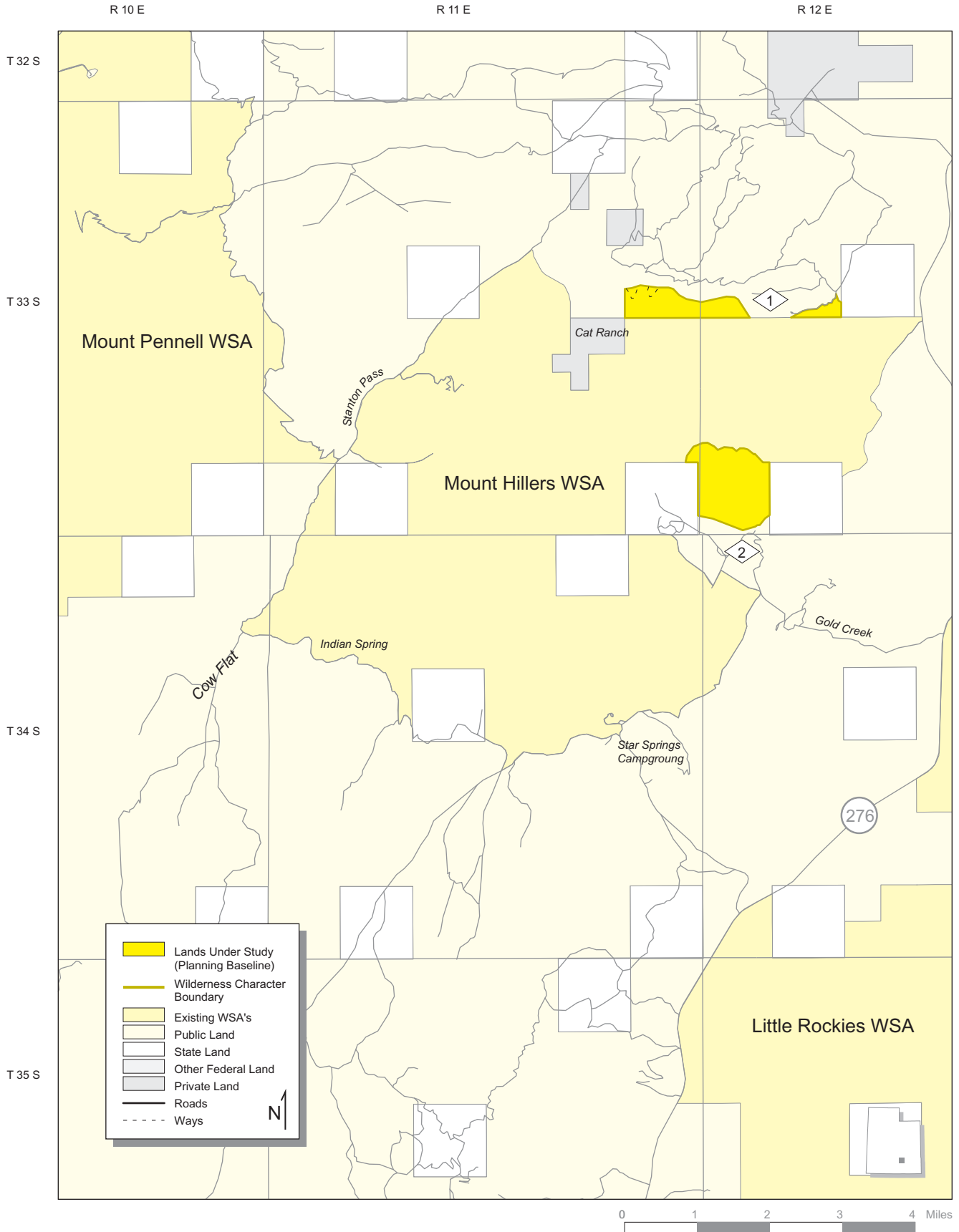


MAP 3.10

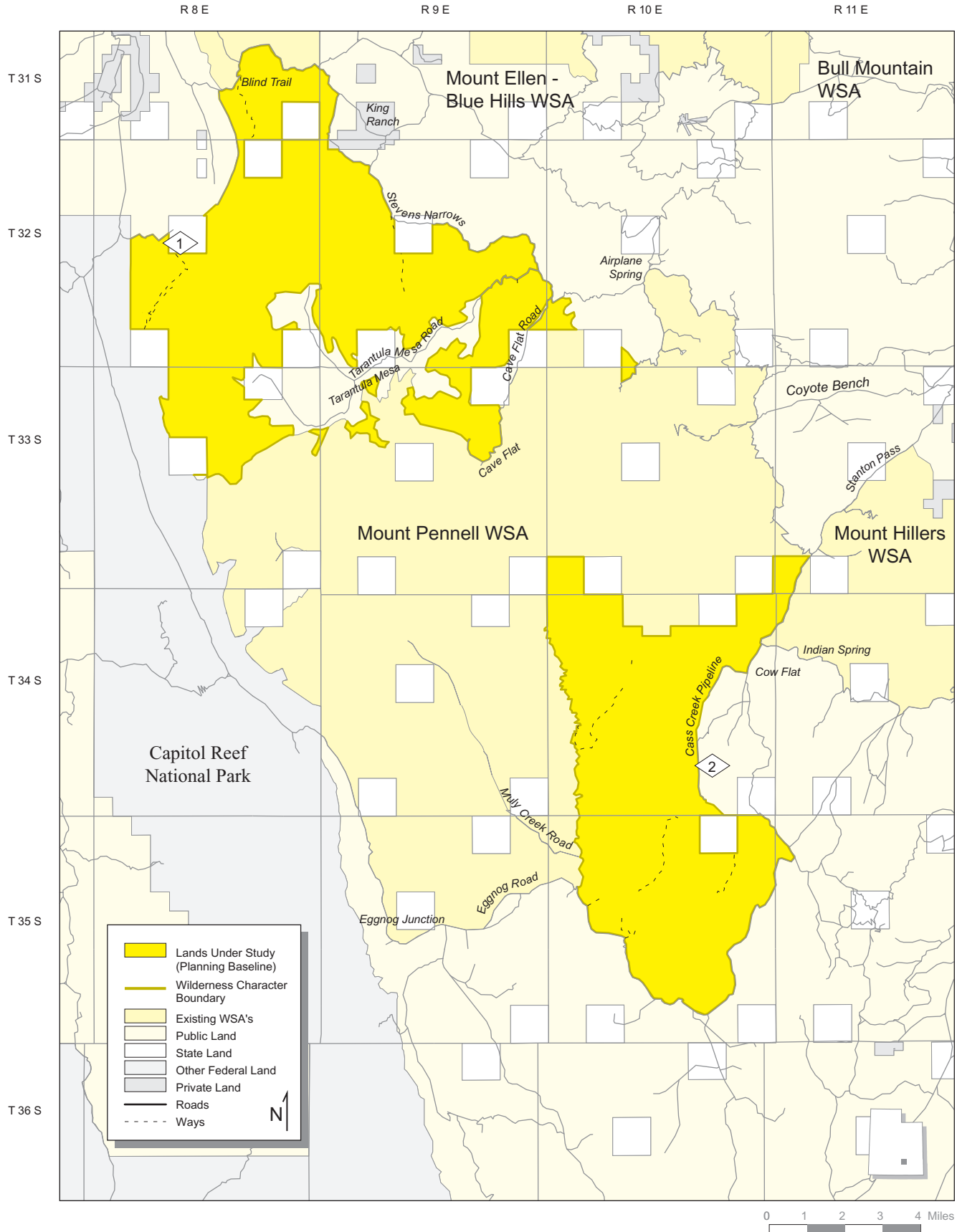


**MAP 3.11**

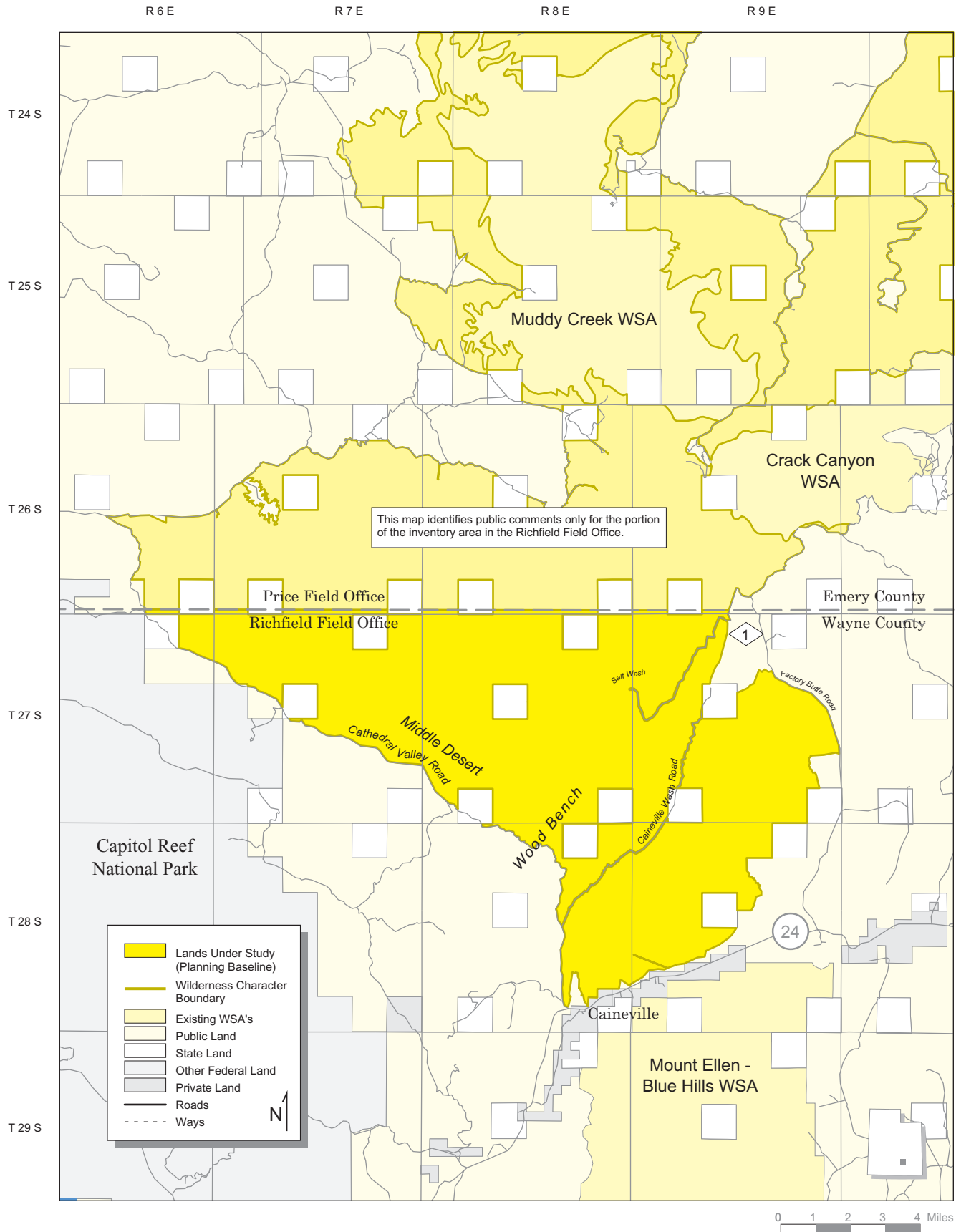




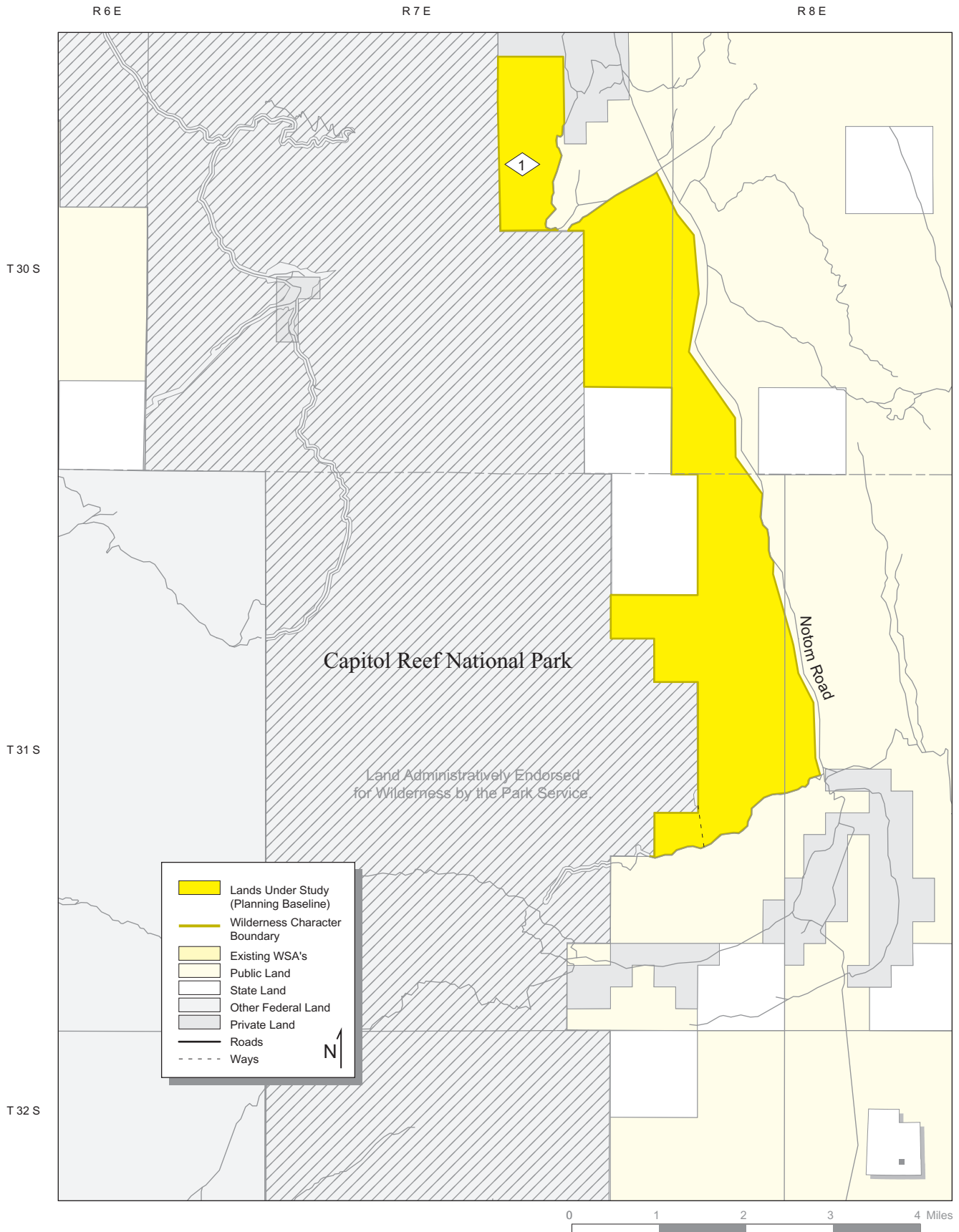
MAP 3.12



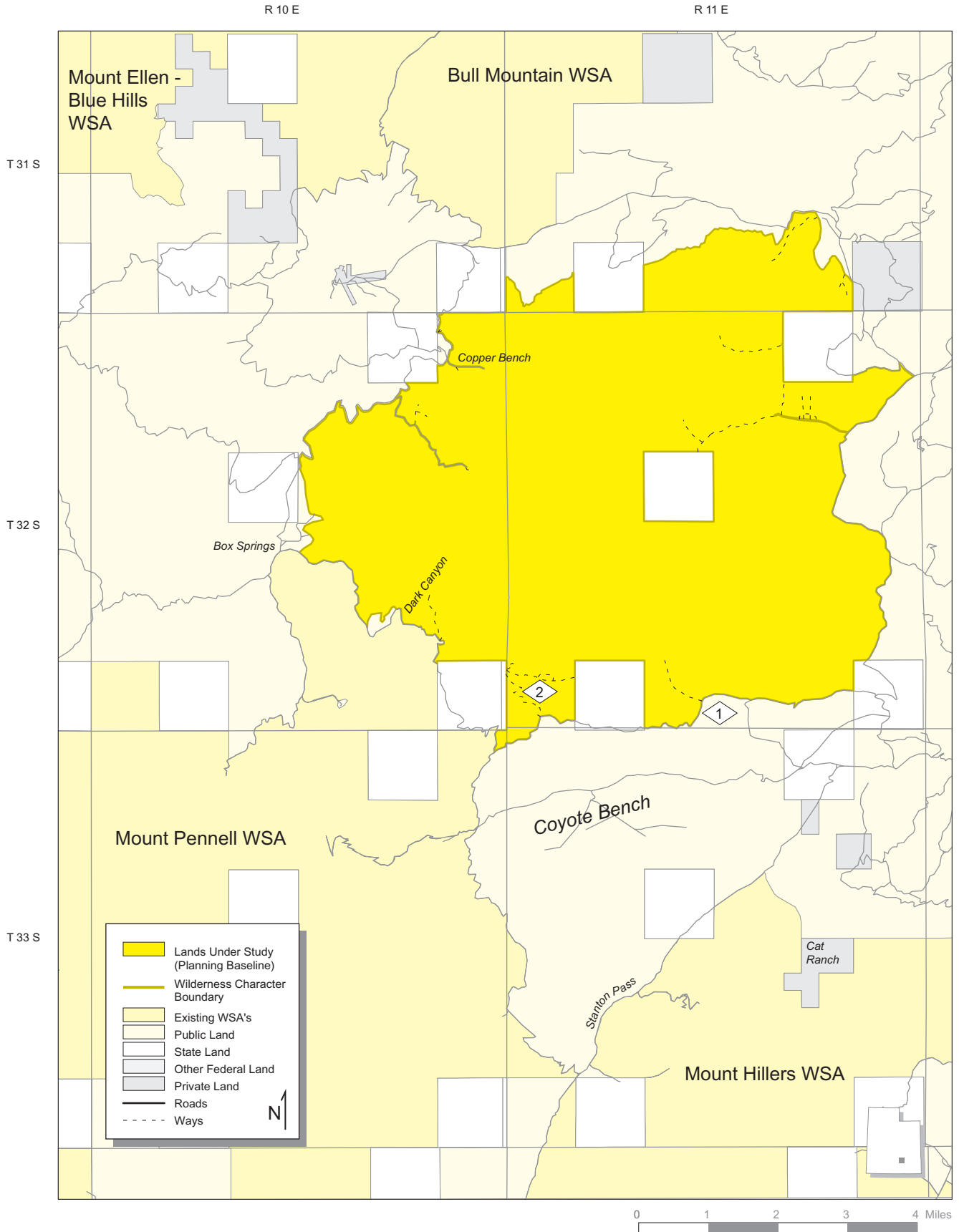
**MAP 3.13**



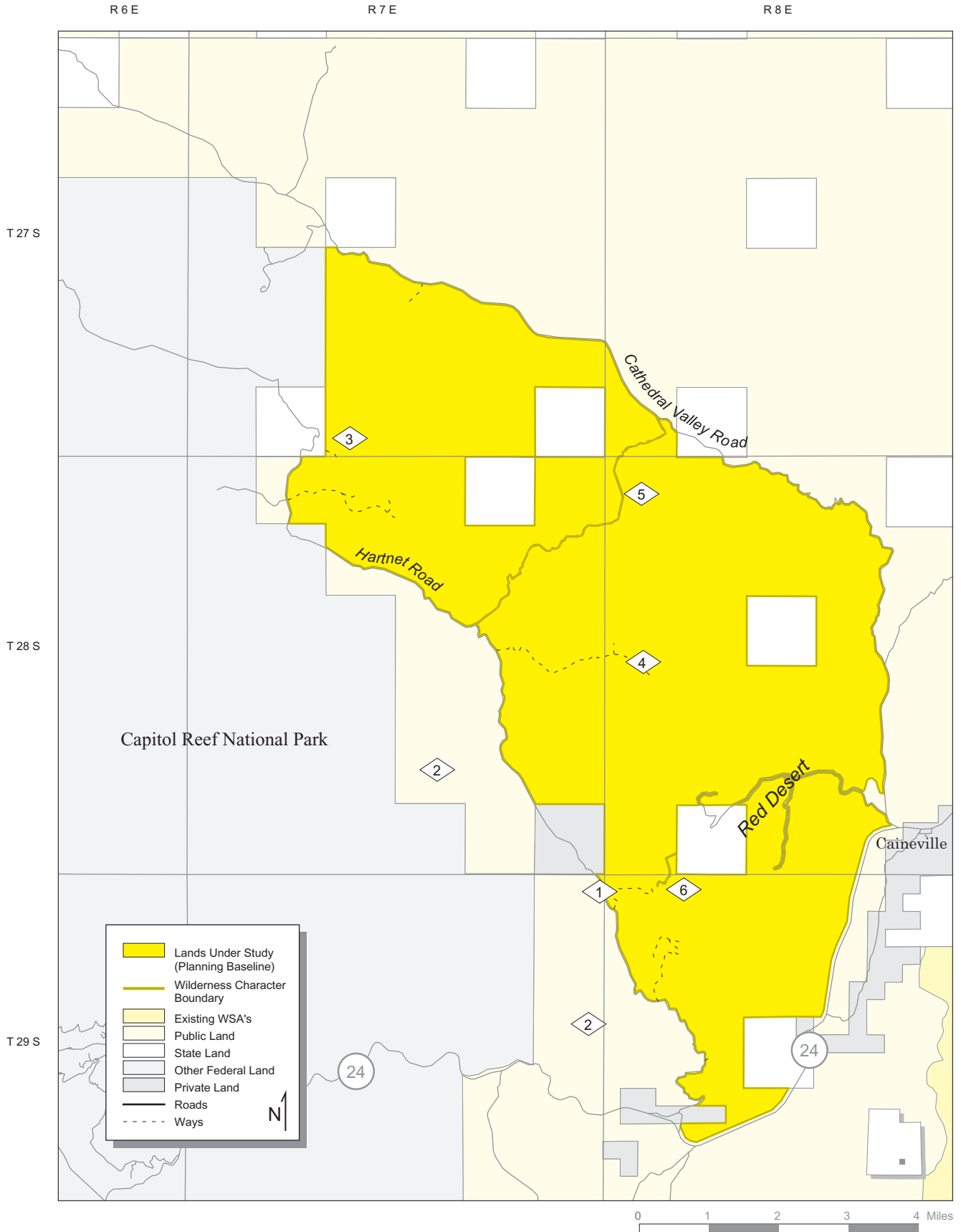
MAP 3.14



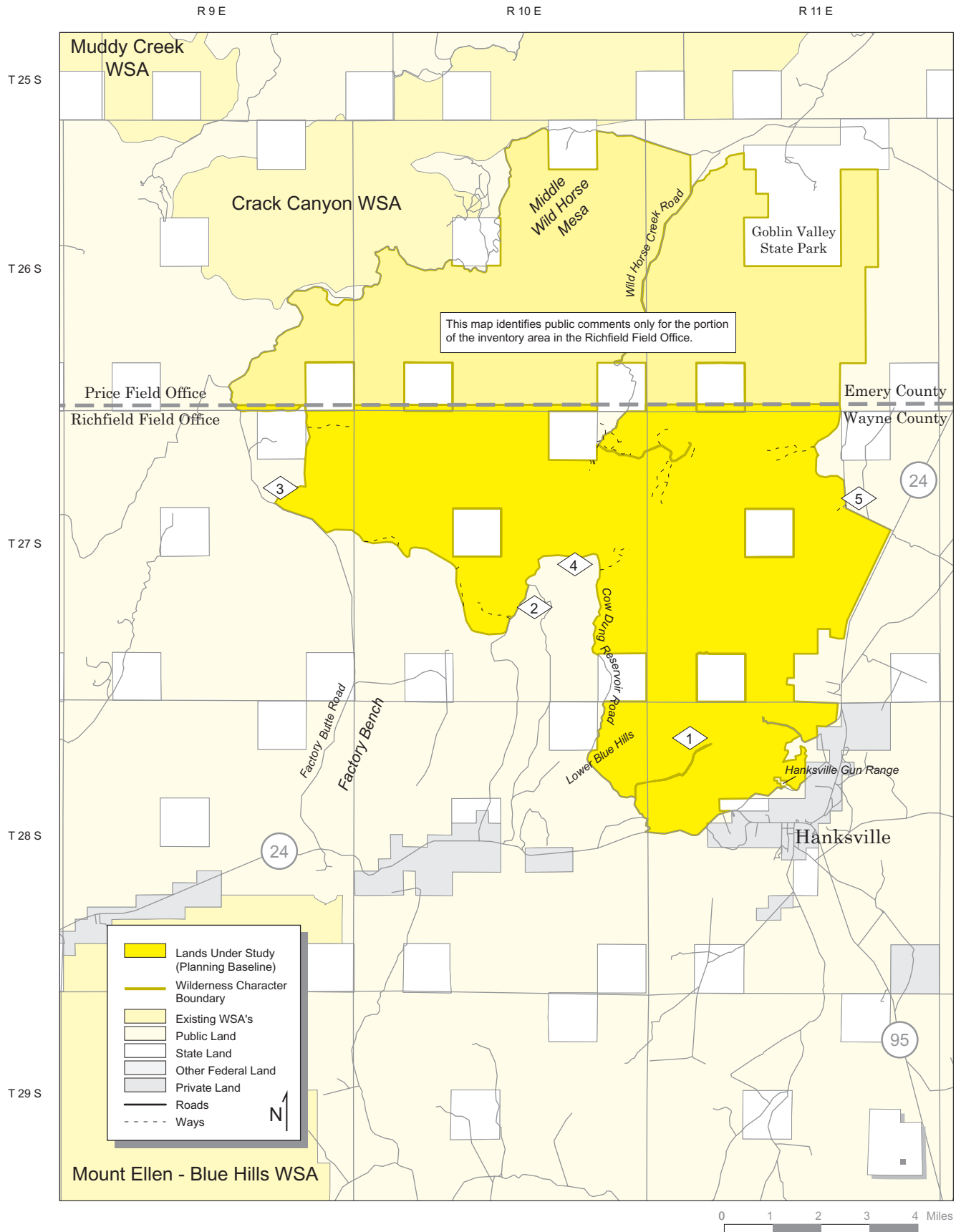
MAP 3.15



MAP 3.16



MAP 3.17



MAP 3.18

## Glossary of Terms

Terms used in this document are defined as follows:

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

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

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

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

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

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

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

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

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

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

**Road:** a vehicle route which has been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road.

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



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

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

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

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

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

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

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

**Wilderness inventory area:** a portion of public land 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, planning, management, and administrative functions.

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

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