

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

Bureau of Land Management

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Section I Introduction

Purpose

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

How This Document Is Organized

This document is organized in three sections:

Section I provides an introduction and background information on Utah's past planning effort and explains how public comments collected during the scoping phase for the WSA study process (1999) helped to refine the inventory. The section also contains information on the criteria used to evaluate wilderness character, and summarizes the acres found to have wilderness character within each of the 22 inventory areas on the lands administered by the Moab Field Office, as originally portrayed in the *1999 Utah Wilderness Inventory*.

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

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

Background

On February 4, 1999, the Bureau of Land Management (BLM) released the *1999 Utah Wilderness Inventory*. Out of 3.1 million public land acres examined statewide (of which 298,050 acres were on lands administered by the Moab Field Office), 2.6 million acres were found to have wilderness character. Wilderness character refers to the criteria from

Section 2(c) of the *Wilderness Act of 1964*. Wilderness character criteria include size, naturalness, and outstanding opportunities for solitude or primitive and unconfined types of recreation. Qualifying areas must also be “roadless.”

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

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

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

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

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

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

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

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

On lands administered by the Moab Field Office, 299,420 acres were inventoried for the presence or absence of wilderness character. Of the inventoried acres, 210,070 were found to possess wilderness character. Lands with wilderness character were found in all 22 of the inventory areas.

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

Inventory Area	Public Lands Inventoried (Acres)	Wilderness Character (Acres)
Beaver Creek	32,600	26,000
Behind the Rocks	7,800	3,400
Coal Canyon	13,850	13,850
Desolation Canyon*	10,690	10,690
Fisher Towers	17,400	17,000
Floy Canyon	12,310	12,310
Flume Canyon	4,800	4,800
Goldbar	13,100	6,500
Gooseneck*	5,300	800
Granite Creek	6,200	5,400
Harts Point*	7,000	1,600
Hatch Wash	24,100	12,000
Hunter Canyon	4,630	4,600
Labyrinth Canyon*	63,200	42,500
Lost Spring Canyon	12,920	11,770
Mary Jane Canyon	25,400	25,000
Mill Creek Canyon	6,710	2,910
Negro Bill Canyon	13,900	2,500
Shafer Canyon	3,100	1,900
Spruce Canyon	2,320	2,320
Westwater Canyon	2,990	2,220

Westwater Creek	9,100	0
Total	299,420	210,070

*This acreage reflects only those portions of the Desolation Canyon, Gooseneck, Harts Point, and Labyrinth Canyon inventory areas under the administration of the Moab Field Office.

Copies of the *1999 Utah Wilderness Inventory* are available from the BLM.

Section II Reevaluation of Inventoried Lands

The thousands of comments that were submitted by the public and BLM’s “internal scoping” process, involving agency review and additional field work, have been extremely helpful in refining the inventory findings to identify the public lands with wilderness character that are subject to consideration in the Moab RMP Revision. The refined inventory findings identify 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 inventory in 17 of the 22 inventory areas under consideration in the Moab RMP Revision. The changes can be broken down into four general categories: 1) mapping improvements and corrections; 2) the exclusion of state lands and contiguous federal land parcels too small to possess wilderness character; 3) changes in vehicle route cherry-stems and/or roads; and 4) changes in wilderness character findings. Changes are described by inventory area in the sections that follow, and are shown on inventory area maps provided later in this section. Additional details are included in the permanent documentation files available for public review at the BLM office in Moab, Utah, as well as in the Public Room at the Utah State Office in Salt Lake City, Utah.

Mapping Improvements and Corrections

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

Exclusion of State Lands and Contiguous Federal Land Parcels Too Small To Possess Wilderness Character

During the re-inventory process, BLM inventoried both federal and state lands. Consequently, state lands were included in the findings presented in the *1999 Utah Wilderness Inventory*. However, BLM has no authority to manage state lands and inventory area boundaries have been redrawn to exclude state lands.

In some cases, the exclusion of state sections has also resulted in the severing of BLM lands that were connected to the wilderness inventory areas only by state lands. A total of 7,676 acres of BLM lands found in 10 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.

Beaver Creek	2,096	acres
Behind the Rocks	2	acres
Coal Canyon	9	acres
Desolation Canyon	192	acres
Fisher Towers	13	acres*
Flume Canyon	1,281	acres
Goldbar	168	acres
Hatch Wash	543	acres
Lost Spring Canyon	45	acres
<u>Spruce Canyon</u>	<u>1,082</u>	<u>acres</u>
TOTAL	7,676	acres

*Severed by private land which was previously state land

Changes in Cherry-stems

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

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

All dead-end vehicle routes that meet the BLM road definition used for wilderness inventory purposes have been cherry-stemmed. The Fisher Towers Road in the Fisher Towers inventory area is an example of a road cherry-stem. This road provides access from State Road 128 to a popular recreation site and trailhead used as a starting point for hikes to Fisher Towers. The road was constructed, is maintained, and receives regular and continuous use by recreationists and others. This road penetrates the inventory area and dead-ends at the Fishers Towers Recreation Site.

In other instances, dead-end vehicle routes that do not meet the BLM road definition (vehicle ways), but constitute a substantially noticeable intrusion, have also been cherry-stemmed. Vehicle way SL1D in the Lost Spring Canyon inventory area is one such example. This route extends past the abandoned Yellow Bird Mine in the western portion of the inventory area. This vehicle way was constructed and receives regular use; however, it does not meet all criteria of the BLM road definition used for wilderness inventory purposes because evidence of maintenance is lacking. It was cherry-stemmed out of the inventory area because surface disturbances associated with use have substantially impacted natural character.

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

Beaver Creek	One cherry-stem removed.
Behind the Rocks	One cherry-stem added.
Fisher Towers	Two cherry-stems added.
Goldbar	One cherry-stem added; one cherry-stem shortened.
Labyrinth Canyon	Two cherry-stems added; one cherry-stem lengthened.
Lost Spring Canyon	One cherry-stem added; one cherry-stem removed.
Mary Jane Canyon	One cherry-stem added; one cherry-stem lengthened.

Changes in Wilderness Character Findings

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

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

Reevaluations of wilderness character have resulted in a reversal of the BLM's initial findings in several instances. Parcels of BLM land have either been removed or added to eight inventory areas. These changes range from the removal of 16,286 acres in the Labyrinth Canyon inventory area and the addition of 8,701 acres in the Westwater Creek inventory area, to the removal of 175 acres in the Behind the Rocks inventory area and the addition of 510 acres in the Mill Creek inventory area. The paragraphs below summarize the changes and reasons for these modifications in each of the affected inventory areas.

Beaver Creek:

Addition of 1,063 acres

Approximately 1,063 acres, located on the southern end of North Beaver Mesa, have been found upon further review to possess wilderness character.

The BLM's inventory of the Beaver Creek inventory area conducted in the fall of 1996 found 27,500 acres with wilderness character; however, a 1,063-acre area was determined to lack wilderness character due to the residual impacts of a 1969 vegetative chaining. Even though this area was found to lack wilderness character, some of the documentation completed at the time of the inventory contained conflicting rationale for this determination. While the inventory team did recommend omitting the chained area, they also noted that the chaining had reached a phase of natural reclamation where a casual observer would not have noticed that the site had been manipulated.

Public comment regarding this area prompted a second field review in the summer of 1999. At that time, field teams found minimal evidence of slash piles, windrows, or other man-made imprints. However, they did find an extensive growth of grasses and shrubs such as sagebrush, and trees of up to 12 feet in height throughout the chained area. Upon further review, the area was judged to have naturally reclaimed to the point where the impacts associated with the 31-year-old chaining are now no longer substantially noticeable. Because the area met all other wilderness criteria, the 1,063-acre parcel has been added to the inventory area with wilderness character.

Behind the Rocks:

Reduction of 175 acres

Approximately 175 acres of the southwest parcel of this inventory area have been removed from the area found to have wilderness character after correction of mapping errors and a reevaluation of the cumulative impacts from several vehicle ways and past mining activities.

During scoping, comments were received regarding the existence of several vehicle routes and areas of mining disturbance located along the western edge of the inventory area. A subsequent review of inventory information in the Behind the Rocks permanent documentation file and a follow-up field check during the spring of 1999 indicated that modification of the boundary for this area was warranted. White Knuckle Hill, part of a permitted Jeep Safari route, was incorrectly mapped resulting in this site being originally included in the inventory area. This mapping error was corrected by shifting the boundary approximately 500 feet to the east to exclude the hill. Another modification was made along the western edge of the inventory area to exclude mining disturbance identified during the field review. Another modification was made along a portion of the southern boundary to follow an old seismic line. The availability of new GPS data resulted in this more accurate mapping of the southern boundary.

Coal Canyon:

Addition of 1,176 acres

Approximately 1,176 acres comprising parts of inventory unit five and the east side of unit four have been found upon further review to possess wilderness character.

The 1999 Utah Wilderness Inventory had determined that the acreage within unit five did not have wilderness character because of the outside sights and sounds of the Cisco Dome oil and gas well field directly to the south of the unit. Public comment indicated there were no intrusions in the unit and the unit possessed wilderness character. This resulted in a review of the inventory file, which revealed the necessity of reviewing BLM wilderness inventory criteria and directions. The review indicated that outside sights and sounds do not necessarily negate the naturalness or wilderness character of a given area. The field team determined that in this circumstance, unit five, which is contiguous to the existing Coal Canyon WSA, is not required to meet the wilderness character criteria of outstanding opportunity for solitude. Outstanding opportunity for solitude is present within the contiguous WSA and does not necessarily need to be present within the inventory unit. The outside sights and sounds of the Cisco Dome oil and gas well field was determined not to be a significant impact to the naturalness of the inventory area. As a result of the review, approximately 603 acres within unit five have been added to the area with wilderness character.

The boundary along the east side of unit four was subject to a field evaluation because public comment indicated the boundary identified during the 1999 Utah Wilderness Inventory excluded land that was natural in character. The field evaluation determined that a series of ways and seismic lines along the boundary provided a more definite visible separation of natural character from the area impacted by the Cisco Dome oil and gas field. This adjustment of the wilderness character boundary has resulted in the addition of approximately 572 acres to the area with wilderness character.

Hatch Wash:

Reduction of 474 acres

Approximately 474 acres east of Trout Water Canyon Spring has been removed from the area with wilderness character because the parcel has been isolated from the rest of the inventory area by a road.

A vehicle route identified as SB99-1 underwent a field evaluation in 1999 because the route had not been fully documented during the 1999 wilderness inventory. Approximately 0.4 miles of this segment was cherry-stemmed along with a stock pond. The route then changed character and was determined to be a way for the remainder of its approximate 1.1-mile length, which looped back to the main boundary road to the south.

Recent information received at the Moab Field Office indicated that the way segment of SB99-1 had been maintained. A field check revealed that the way has been bladed. The bladed segment was renamed HWS-1, and has been determined to be a road. The road determination has resulted in the isolation of approximately 394 acres from the area with wilderness character. In addition, an 80-acre parcel north of the stock pond is now

bordered on all sides by roads and state lands and has been isolated from the rest of the area found to have wilderness character. The 80-acre parcel has also been removed from the area with wilderness character. As a result, a total of approximately 474 acres have been removed from the area with wilderness character. The segment of SB99-1 that had been cherry-stemmed to the stock pond is no longer within the area with wilderness character and has been removed.

Labyrinth Canyon:

Reduction of 18,200 acres

A total of 18,200 acres, located in four separate parcels (10,020, 6,940, 1,140 and 100 acres), have been determined to lack wilderness character because of the cumulative impacts of intrusions in the form of seismic lines, drill holes, range developments, mining disturbances, vehicle ways and other man-made intrusions.

The 1999 Utah Wilderness Inventory found that of the 63,200 acres inventoried on the east side of the Green River in Grand County, 42,500 acres had wilderness character. Approximately 20,700 acres, largely involving the upland benches and flats in the eastern portion of the area, were determined to lack wilderness character due to impacts from OHV use, range developments, and past and present mineral exploration activities.

Numerous scoping comments stated that an extensive network of vehicle routes and other intrusions had been overlooked by BLM. Most of the vehicle routes described by these comments were located on the mesa tops above the river canyon.

While BLM inventory files made reference to a few vehicle ways in this part of the inventory area, little documentation was provided on maps or road/way forms. Due to this gap in inventory data, BLM conducted an additional field review of the Labyrinth area during the summer of 1999. This subsequent review verified much of what was submitted by the public during scoping.

An extensive network of interconnecting vehicle routes and old seismic lines was found to crisscross large portions of the inventory area. The majority of these man-made imprints were located on the uplands east of Spring Canyon and in the Ten Mile Canyon area. While many of these routes were faint, others were quite distinct showing evidence of frequent vehicle use. Additional intrusions, including drill-pads, other mining disturbances, range facilities, and OHV disturbances, were also noted in several locations. It was determined that the cumulative effect of these intrusions has negated much of the natural character of Ten Mile Canyon and its surrounding mesa tops, as well as the uplands east of Spring Canyon. As a result, area boundaries have been redrawn to exclude approximately 18,100 acres lacking wilderness character in these locations. In addition, a 100-acre parcel adjacent to the Mineral Point road along the southern boundary of the area has been excluded from the area with wilderness character due to impacts of past mineral, oil and gas exploration.

As a result of the reduction in acres, the area with wilderness character now consists of ~24,300 acres divided into three separate stand-alone parcels. The northernmost parcel is

less than 5,000 acres, and is bounded on the west side by the Green River. Although the State of Utah owns the river bottom, it is extremely unlikely that this portion of the river will ever be developed in any way. On the other side of the river is the western portion of the Labyrinth Canyon inventory area (which is being studied for WSA designation in the Price RMP Revision) and the North Horseshoe Canyon WSA. The management of the northern Labyrinth Canyon parcel in an unimpaired condition is practicable when considered in conjunction with the natural river corridor and the western Labyrinth Canyon parcel on the other side of the river.

Lost Spring Canyon:

Addition of 600 acres

Approximately 600 acres of state land located along Fish Seep Draw, recently acquired by the BLM, and previously found to possess wilderness character during the inventory have been added to the area with wilderness character.

The 1999 Utah Wilderness Inventory found approximately 630 acres in the vicinity of Fish Seep Draw to have wilderness character. All of this acreage was located on state land, (section 16) and was initially removed from further consideration in the inventory. However, through a land transaction with the State of Utah, this section was acquired by the BLM. A small parcel (~30 acres) encompassing the lower part of Fish Seep Draw was transferred to the National Park Service and is now part of Arches National Park. The remaining 600 acres within the section have been added to the inventory area with wilderness characteristics.

Mill Creek Canyon:

Addition of 510 acres

Approximately 510 acres located below South Mesa have been found upon further review to possess wilderness character.

The 1999 Utah Wilderness Inventory found 2,910 acres of the 6,710 acres inventoried as having wilderness character. Most of the lands found to lack wilderness character are located in an area of mixed public and state-acquired land south of the existing Mill Creek Canyon WSA, in areas known as Between-the-Creeks and South Mesa.

Comments received during scoping stated that the BLM was incorrect in its initial evaluation of unit 4 by excluding approximately 510 acres on the south end of the unit from the area with wilderness character. A subsequent review of previous inventory information and a follow up field check resulted in a change to BLM's original finding. The area below South Mesa was found to be natural in character and as a result, the area with wilderness character has been extended in this location to add an additional 510 acres

Westwater Creek:

Addition of 8,701 acres

Approximately 8,701 acres that comprise the Westwater Creek inventory area have been found upon further review to possess wilderness character.

The 1999 Utah Wilderness Inventory determined that the 8,701 acres that comprise the Westwater Creek inventory area did not have wilderness character. The inventory indicated that while the area was mostly natural in character, it did not possess outstanding opportunities for solitude because of a natural gas pipeline and an active gas well that was located within the unit.

It has been determined that the area does possess outstanding opportunities for solitude and outstanding opportunities for primitive and unconfined recreation because a review of the inventory file and field evaluations determined that the gas well was not active but had been capped in 1967. The drill pad is overgrown and the access route to the site is difficult to find. There are no facilities or pipeline at the site, but the right-of-way for the presently defunct drilling operation is still active. The natural gas pipeline identified in the inventory file is also within an active right-of-way that runs down Pipeline Canyon and Westwater Creek. This right-of-way forms the southern boundary of the inventory unit. The active right-of-way to the abandoned drill pad has been cherry-stemmed from the unit.

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

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

During the scoping process, additional man-made intrusions impacting wilderness character were identified that resulted in slight boundary adjustments to seven of the 22 inventory areas. In nearly all cases, these changes are the result of the identification of man-made intrusions that existed at the time of initial field inventories, but that were overlooked by inventory teams or imprecisely documented on field inventory maps. As an example, a slight boundary adjustment (approximately 3-acres) was required because of the new construction of a small compressor building along an underground pipeline in the Behind the Rocks inventory area. The construction of this facility was authorized prior to the start of the wilderness inventory.

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

Beaver Creek Removal of approximately two acres to exclude a stock pond along the boundary of the area.

- Behind the Rocks*** Removal of approximately three acres to exclude a natural gas compressor station along the eastern boundary of the area.
- Fisher Towers*** Removal of one acre to exclude a drill pad at the end of a route that has been cherry-stemmed from the inventory area.
- Removal of 13 acres to exclude a stock pond and an abandoned drill pad at the end of a route that has been cherry-stemmed from the inventory area.
- Goldbar*** Removal of approximately two acres to exclude a drill pad along the boundary of the area.
- Labyrinth Canyon*** Removal of approximately 30 additional acres of lands impacted by mining disturbance at the Hey Joe Mine site.
- Removal of approximately 39 additional acres of lands impacted by mining disturbance.
- Lost Spring Canyon*** Removal of approximately 10 acres to exclude an area of mining impacts adjacent to a route that has been cherry-stemmed from the inventory area.
- Mary Jane Canyon*** Removal of approximately five acres to exclude a ditch right-of-way.
- Removal of approximately one acre to exclude a stock pond along the boundary of the inventory area.
- Removal of approximately two acres to exclude a stock pond at the end of a route that has been cherry-stemmed from the inventory area.
- Removal of approximately two acres to exclude a retention dam and mining debris that has been added to the end of a cherry-stem.

Summary of Changes By Inventory Area

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

Tips On Using the Maps in this Section

The “Inventory Modifications” maps (Maps 2.1 to 2.17) show the original lands found to have wilderness character in the *1999 Utah Wilderness Inventory* and the changes

identified in this document. Differences between the two sets of data are lettered (i.e. A, B, C...) and described in accompanying narratives.

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

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

Lands with wilderness character are depicted as dark yellow. In some cases the areas found to have wilderness character have been modified from that shown in the *1999 Utah Wilderness Inventory*.

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

Lands found to have wilderness character upon further review are depicted as dark yellow with diagonal stripes. These lands were initially found to lack wilderness character. However, upon reevaluation, these lands were found to have qualifying wilderness characteristics.

Table 2-1: Summary of Changes by Inventory Area

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
<p>Beaver Creek (Refer to Map 2.1)</p>	A. This parcel of BLM land (~ 45 acres) is separated from the inventory area by state lands and a cherry-stem road.
	B. The alignment of this cherry-stem has been corrected. The thin line portrays the correct alignment for this cherry-stem.
	C. The perimeter boundary in these three areas was incorrectly shown on the Beaver Creek map in the <i>1999 Utah Wilderness Inventory</i> due to a mapping error. The lands that were found to have wilderness character are shown in dark yellow.
	D. Approximately 1,063 acres located on the southern end of North Beaver Mesa have been found upon further review to possess wilderness character.
	E. Upon an office review of the inventory file, approximately two acres along the boundary of this area has been removed from the area with wilderness character to exclude a stock pond.
	F. This parcel (~ 2,050 acres) has been severed from the inventory area by state lands.
	G. This route has been excluded from the area with wilderness character. This short spur road, providing access to an overlook of Fisher Creek, is an extension of the boundary road for this portion of the Beaver Creek inventory area and has been cherry-stemmed.

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
<p>Beaver Creek (Refer to Map 2.1)</p>	<p>H. Upon further review this route was found to be a vehicle way (no maintenance, no regular or continuous use) that does not constitute a substantially noticeable intrusion on natural character. The cherry-stem has been removed from the area with wilderness character. This spur route was cherry-stemmed in the legislative proposal (HR 1500) that was the focus of the <i>1999 Utah Wilderness Inventory</i>.</p>
	<p>I. The light yellow area below the black line was originally inventoried and found not to have wilderness character, but was incorrectly mapped in the <i>1999 Utah Wilderness Inventory</i>. The boundary line on the Beaver Creek wilderness character map has been adjusted to correct this digitizing error.</p>
<p>Behind the Rocks (Refer to Map 2.2)</p>	<p>A. Upon further review of the inventory file, it was revealed that this cherry-stem, which branches from the Moab Rim Trail, was inadvertently omitted from the map in the <i>1999 Utah Wilderness Inventory</i>. The cherry-stem has been placed on the map to correct this mapping error.</p>
	<p>B. As a result of a field evaluation, approximately three acres have been excluded from the area with wilderness character due to the presence of a natural gas pipeline compressor station. Authorization for this facility was granted in 1992, prior to the start of the wilderness re-inventory in 1996.</p>
	<p>C. The area in dark yellow, south of the black line, was originally inventoried and found to have wilderness character but was incorrectly mapped in the <i>1999 Utah Wilderness Inventory</i>. The boundary line on the Behind The Rocks wilderness character map has been adjusted to correct this digitizing error.</p>
	<p>D. As a result of a field evaluation, approximately 175 acres have been removed from the area with wilderness character due to the cumulative impact of several vehicle ways and past mining activities.</p>
	<p>E. This parcel of BLM land (~ 2 acres) was removed from the area with wilderness character because it is severed by a section of state land.</p>
	<p>F. The area in dark yellow, west of the black line, was originally inventoried and found to have wilderness character but was incorrectly mapped in the <i>1999 Utah Wilderness Inventory</i>. The boundary has been adjusted in the area with wilderness character to correct this digitizing error.</p>
<p>Coal Canyon (Refer to Map 2.3)</p>	<p>A. These parcels of BLM land (~9 acres) have been severed by state lands and are not part of the area with wilderness character.</p>
	<p>B. Upon further review of the inventory file, the wilderness character boundary has been adjusted due to the finding of wilderness character. This adjustment is based on the determination that outside sights and sounds are not a significant impact to naturalness. This has resulted in the addition of ~572 acres to the area with wilderness character.</p>
	<p>C. Upon further field review and evaluation, the wilderness character boundary has been adjusted to follow a series of old ways, roads, and seismic lines to define the edge of naturalness. This has resulted in the addition of ~603 acres to the area with wilderness character.</p>
<p>Desolation Canyon (Refer to Map 2.4)</p>	<p>A. This parcel of BLM land (~192 acres) has been severed by state lands and is not part of the area with wilderness character.</p>
<p>Fisher Towers (Refer to Map 2.5)</p>	<p>A. This parcel of BLM land (~13 acres) is severed by private property and is not part of the area with wilderness character.</p>
	<p>B. Upon further field review and evaluation, these two vehicle routes by Cowskin Springs were determined to be roads and have been cherry-stemmed.</p>
	<p>C. The boundary at this location has been adjusted to correct a digitizing error.</p>

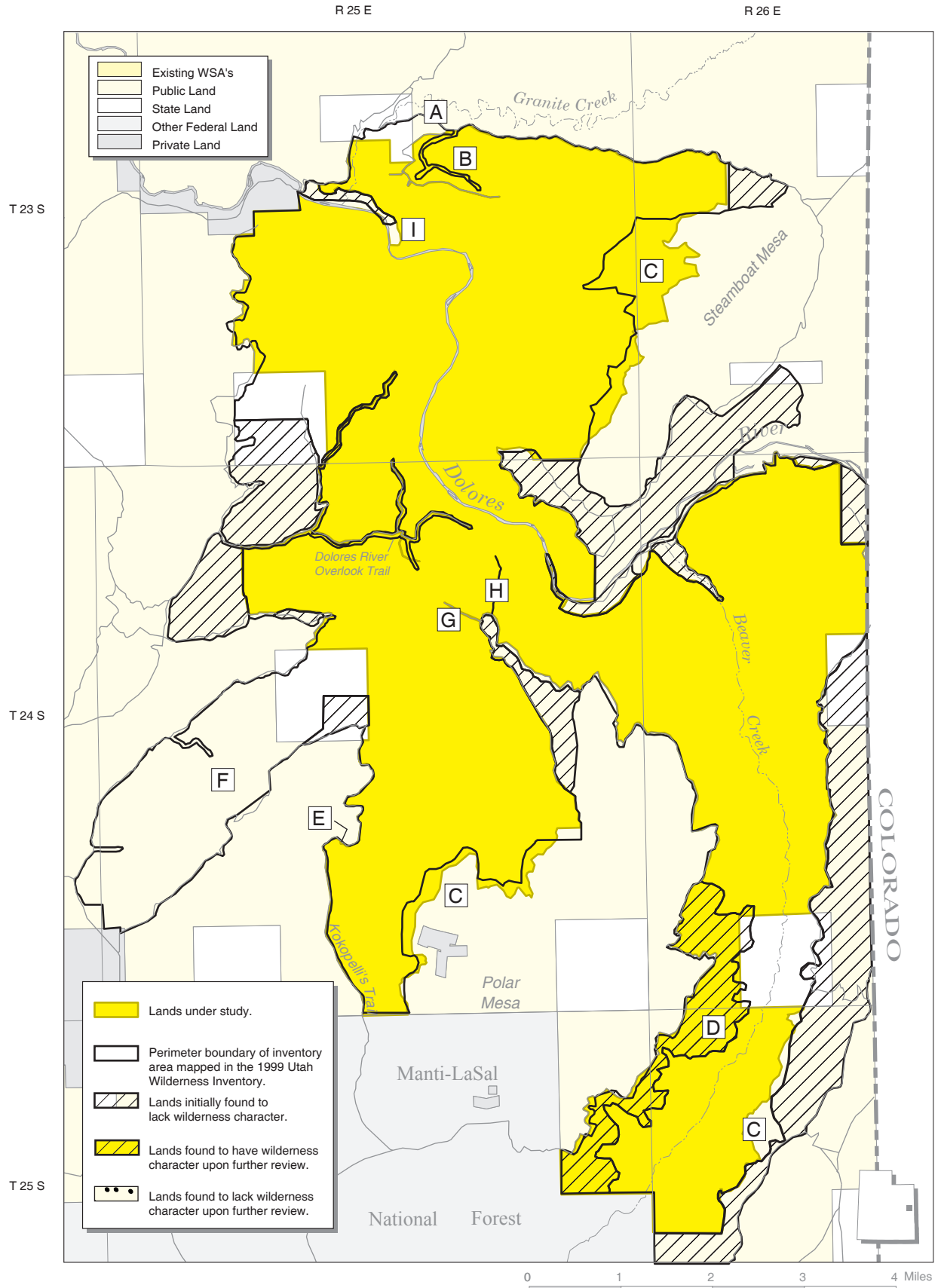
INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
Fisher Towers (Refer to Map 2.5)	<p>D. Upon further field review and evaluation, this route was determined to be a road. This dead-end road, an adjacent stock pond, and an abandoned drill pad have been cherry-stemmed from the area with wilderness character.</p> <p>E. The boundary at this location has been adjusted to correct a digitizing error.</p>
Floy Canyon (Refer to Map 2.6)	<p>A. These two parcels of BLM land (~2,245 acres) have been severed by state lands and are not part of the area with wilderness character.</p>
Flume Canyon (Refer to Map 2.7)	<p>A. These three parcels of BLM land (~1,281 acres) have been severed by state lands and are not part of the area with wilderness character.</p> <p>B. Upon further field review and evaluation, these two parcels (~520 acres) were determined to be natural in character and have been added to the area with wilderness character.</p>
Goldbar Refer to Map 2.8)	<p>A. The boundary at this location has been adjusted to correct a digitizing error.</p> <p>B. These two parcels of BLM land (~168 acres) are severed from the area with wilderness character by state lands.</p> <p>C. The cherry-stem across Day Point has been shortened by about one mile, ending at a substantially noticeable drill pad. This segment is well established, receives regular and continuous use, and constitutes a substantially noticeable intrusion impacting wilderness character.</p> <p>D. The boundary at this location has been adjusted to correct a digitizing error. Approximately two acres along the boundary have been removed to exclude remnants of past oil and gas exploration.</p> <p>E. This cherry-stem road was inadvertently omitted from the map in the <i>1999 Utah Wilderness Inventory</i> and has been added to the wilderness character map.</p>
Granite Creek (Refer to Map 2.9)	<p>A. The perimeter boundary at this location was incorrectly shown on the Granite Creek map in the <i>1999 Utah Wilderness Inventory</i>. The mapping error has been corrected in the area with wilderness character map.</p>
Hatch Wash (Refer to Map 2.10)	<p>A. The boundary at this location has been adjusted to correct a digitizing error.</p> <p>B. These parcels of BLM land (~543 acres) have been severed from the area with wilderness character by state lands.</p> <p>C. The boundary at this location has been adjusted to correct a digitizing error.</p> <p>D. The boundary at this location has been adjusted to correct a digitizing error.</p> <p>E. The boundary at this location has been adjusted to correct a digitizing error.</p> <p>F. Upon further field review and evaluation, two parcels (~474 acres) were determined not to be natural in character and have been removed from the area with wilderness character, because they have been isolated by a recently bladed vehicle way that has been determined to be a road.</p>
Labyrinth Canyon (Refer to Map 2.11)	<p>A. This parcel of BLM land (~1,140 acres) between the Trin-Alcove cherry-stem, a motorcycle track and the Green River has been excluded from the area with wilderness character. The motorcycle track was determined to be a substantial impact and edge of disturbance in this area.</p> <p>B. The access route to Trin-Alcove Point was determined to be a road and has been cherry-stemmed from the area with wilderness character.</p>

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
<p>Labyrinth Canyon (Refer to Map 2.11)</p>	C. These two parcels of BLM land (~114 acres) were severed from the area with wilderness character when the wilderness character boundary was redrawn along a distinct seismic line that marks the edge of disturbance.
	D. Approximately 10,020 acres at Ten Mile Point/Canyon have been removed from the area with wilderness character because of the cumulative impacts of seismic lines, drill holes, range developments, mining disturbances, ways and other man-made impacts that have significantly impacted natural character.
	E. Approximately 6,167 acres has been removed from the area with wilderness character because of the cumulative impacts of intrusions in the form of seismic lines, drill holes, range developments, mining disturbances, vehicle ways and other man-made intrusions that have caused this area to lose its natural character.
	F. Approximately 100 acres along the Mineral Point Road has been removed from the area with wilderness character to exclude an area impacted by past mining and oil and gas activities that constitute a substantially noticeable intrusion on natural character.
	G. The cherry-stem on this route has been extended in the area with wilderness character to exclude the entire route accessing the Hey Joe Mine. This route segment was re-evaluated and determined to be a road.
	H. The area around the Hey Joe Mine site has been enlarged by approximately 30 acres to exclude from the area with wilderness character mining and vehicle-related impacts.
	I. Approximately 39-acres in this area has been excluded from the area with wilderness character because of mining and vehicle-related impacts.
	J. This vehicle route was determined to be a road and is cherry-stemmed to Hellroaring Canyon.
<p>Lost Spring Cyn (Refer to Map 2.12)</p>	A. Upon field review, this vehicle way was determined to be a substantially noticeable intrusion upon natural character. The route and an approximate 10-acre site impacted by mining activities and vehicle routes have been excluded from the area with wilderness character by a cherry-stem.
	B. As a result of a land transaction with NPS, these parcels of land (~872 acres) are now a part of Arches National Park and are no longer included in the area with wilderness character.
	C. Upon field review, this road was determined to be a vehicle way because of no evidence of maintenance or regular and continuous use. The cherry-stem has been removed from the area with wilderness character.
	D. This parcel of BLM land (~45-acres) is severed from the area with wilderness character by state land.
	E. This parcel of land (~600-acres) was acquired by BLM through a land transaction with the state and has been added to the area with wilderness character.
<p>Mary Jane Canyon (Refer to Map 2.13)</p>	A. Upon further review of the inventory file, the wilderness character boundary has been adjusted at this site by the placement of a cherry-stem to exclude an authorized ditch right-of-way.
	B. The boundary at this location has been adjusted to correct a digitizing error. Approximately one acre along the boundary was removed from the area with wilderness character to exclude a stock pond.
	C. The cherry-stem on Adobe Mesa was omitted from the <i>1999 Utah Wilderness Inventory</i> map. The cherry-stem has been placed on the map to correct this mapping error.

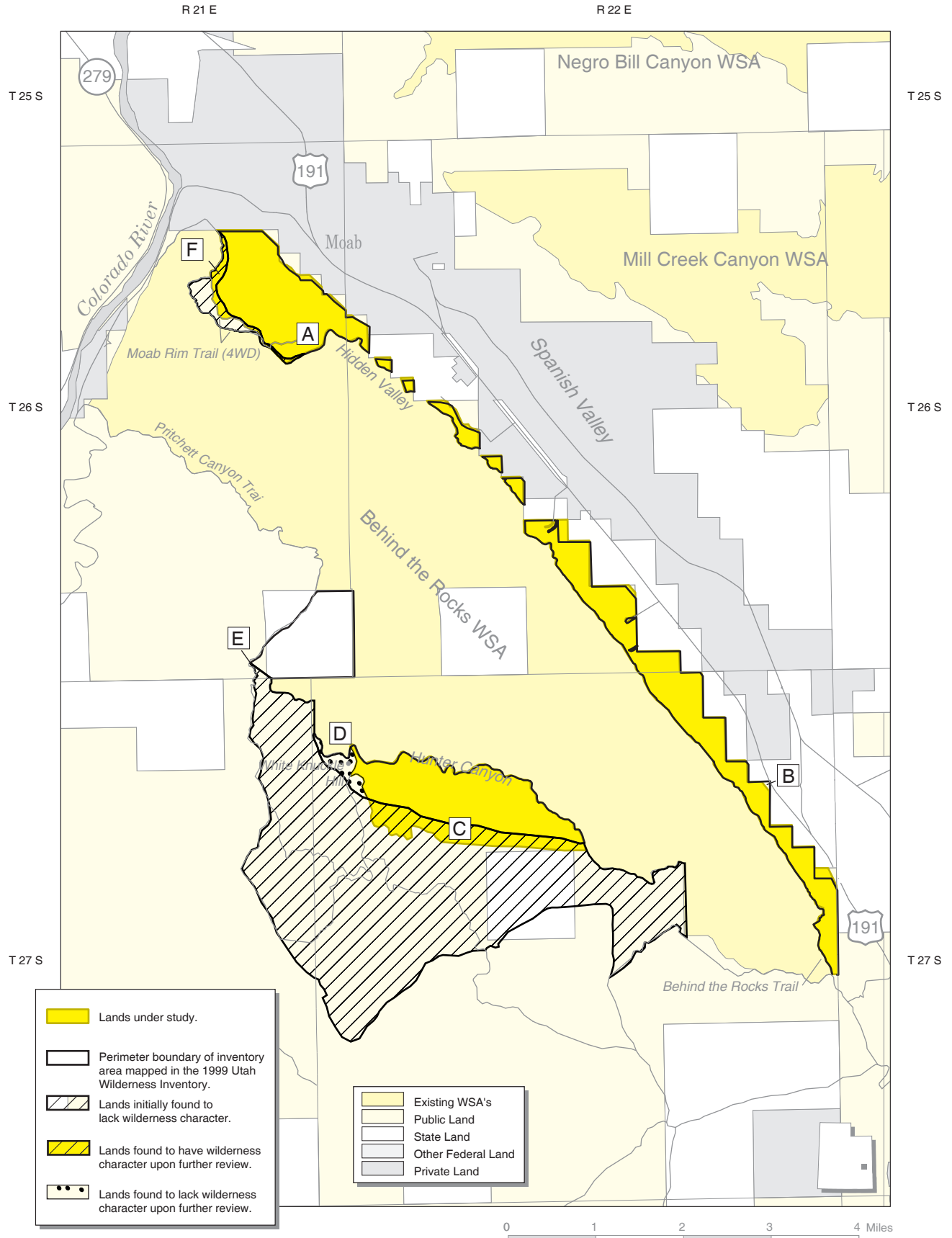
INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
Mary Jane Canyon (Refer to Map 2.13)	D. Upon field review, the cherry-stem in sec.3, east of Fisher Mesa has been expanded to include a large earthen dam and mining debris.
Mill Creek Canyon (Refer to Map 2.14)	A. Upon field review, a parcel (~460-acres) located below South Mesa, has been added to the area with wilderness character because it was found to be natural in character.
	B. Upon further review of the inventory file, this triangular parcel (~8 acres) has been isolated from the area with wilderness character by vehicle ways that are substantially noticeable intrusions on naturalness.
Negro Bill Canyon (Refer to Map 2.15)	A. The boundary at these locations has been adjusted to correct digitizing errors.
	B. The boundary at this location has been adjusted to correct a digitizing error.
Spruce Canyon (Refer to Map 2.16)	A. This parcel of BLM land (~1,082 acres) has been severed by state lands and is not part of the area with wilderness character.
Westwater Creek (Refer to Map 2.17)	A. Upon further inventory file review and field evaluation, all inventoried public lands within Westwater Creek were determined found to have wilderness character.

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

- Gooseneck (that portion under the administration of the Moab Field Office),
- Harts Point (that portion under the administration of the Moab Field Office),
- Hunter Canyon,
- Shafer Canyon,
- Westwater Canyon



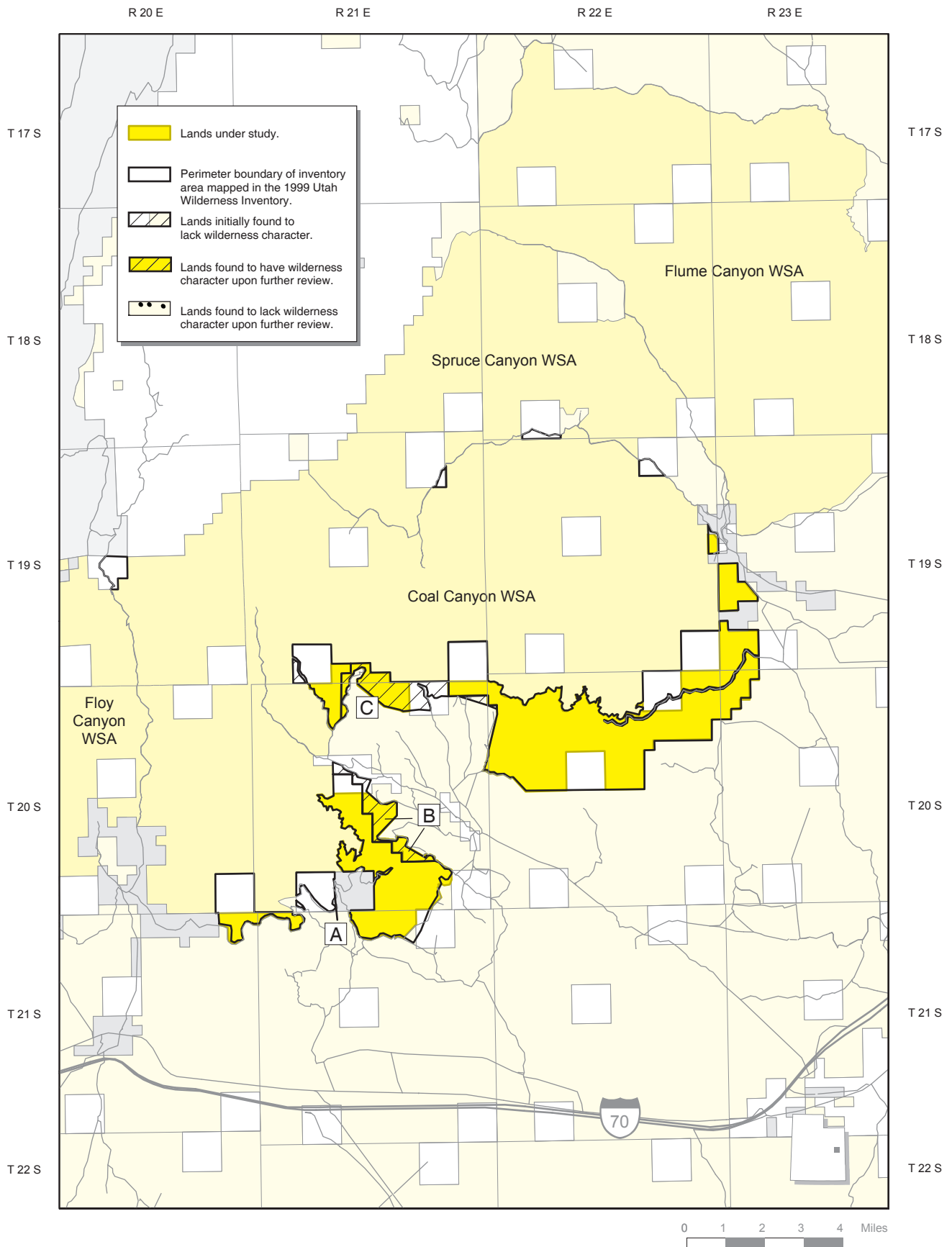
MAP 2.1



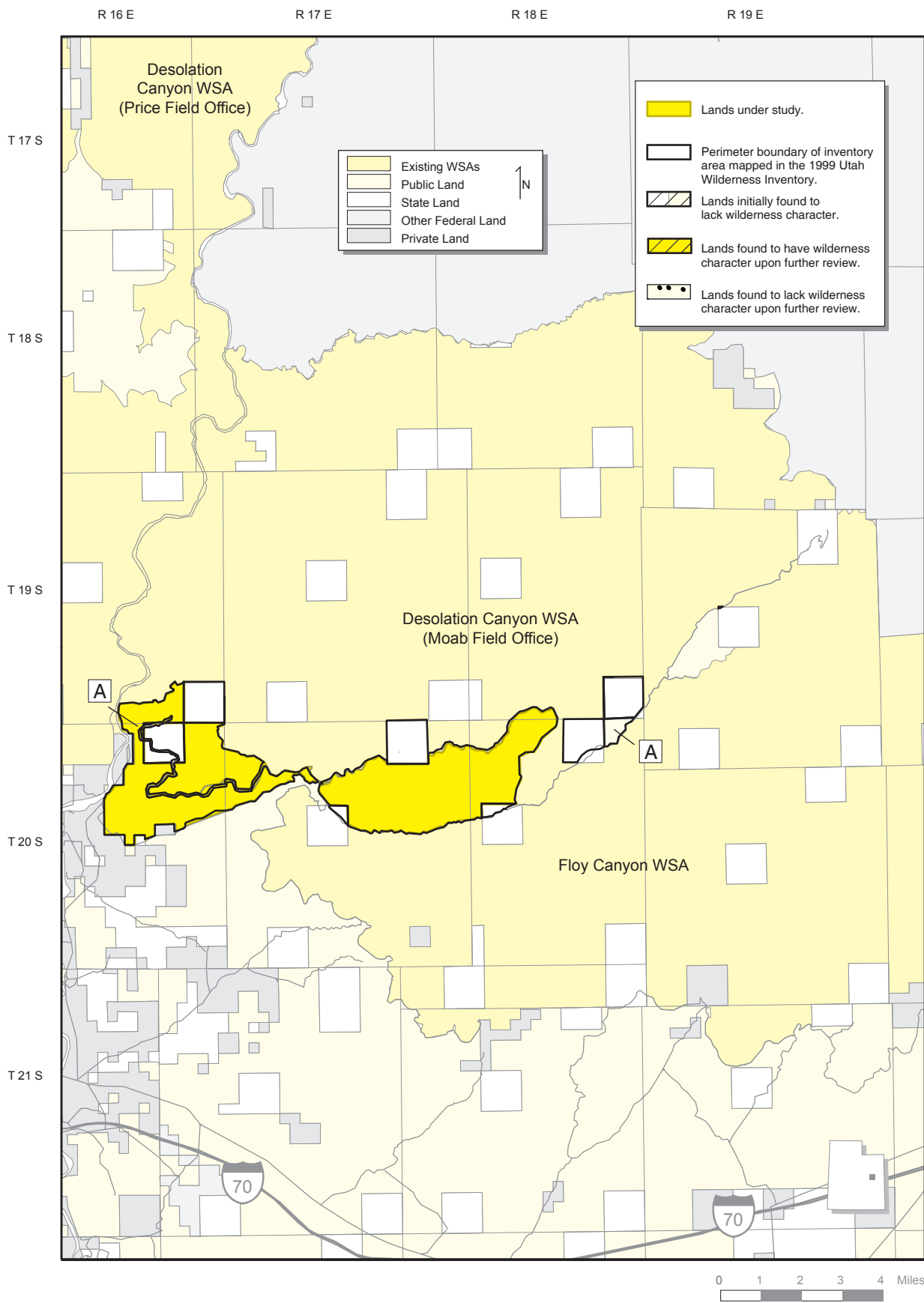
MAP 2.2

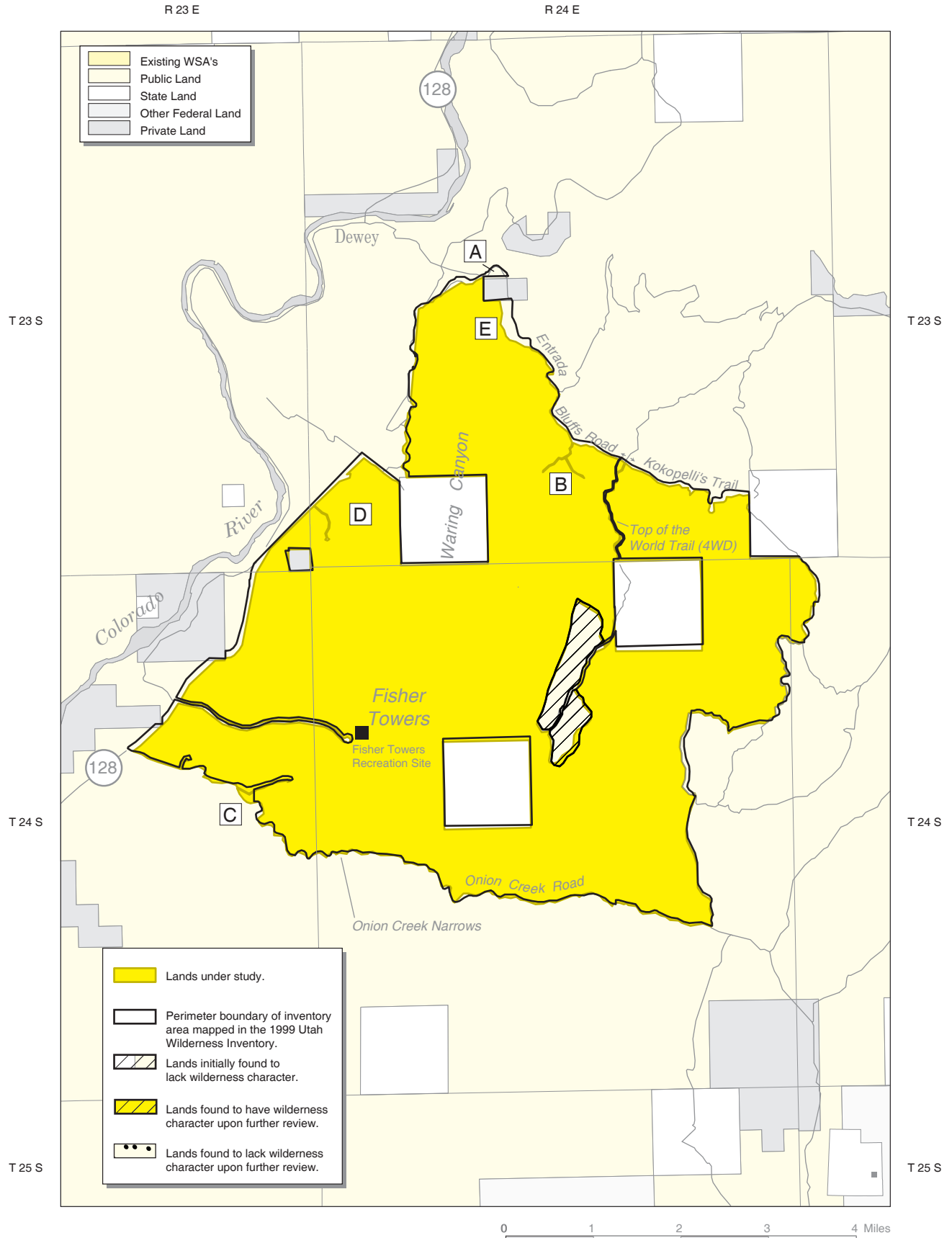
Coal Canyon

Wilderness Character Modifications



Desolation Canyon Wilderness Character Modifications

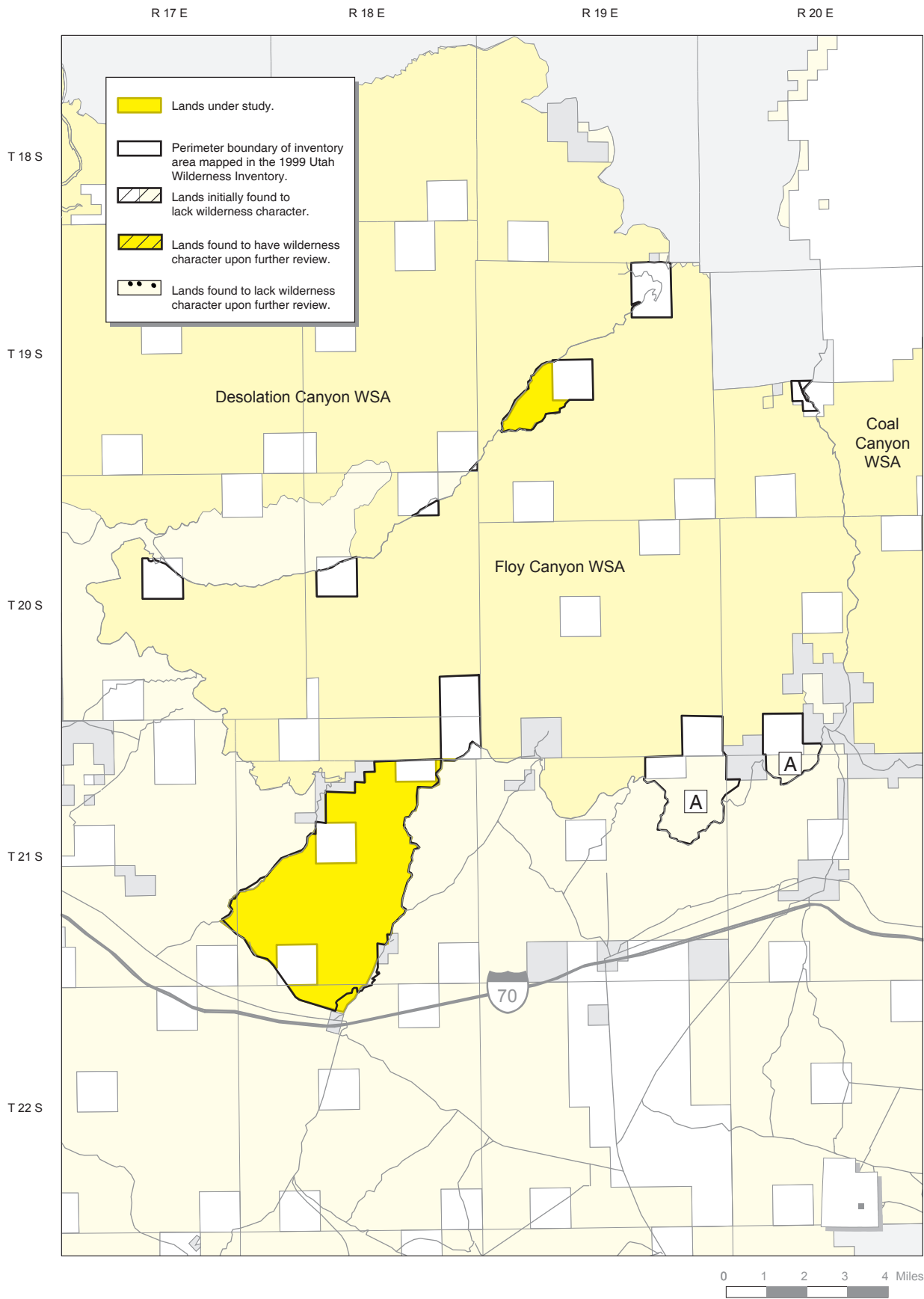




MAP 2.5

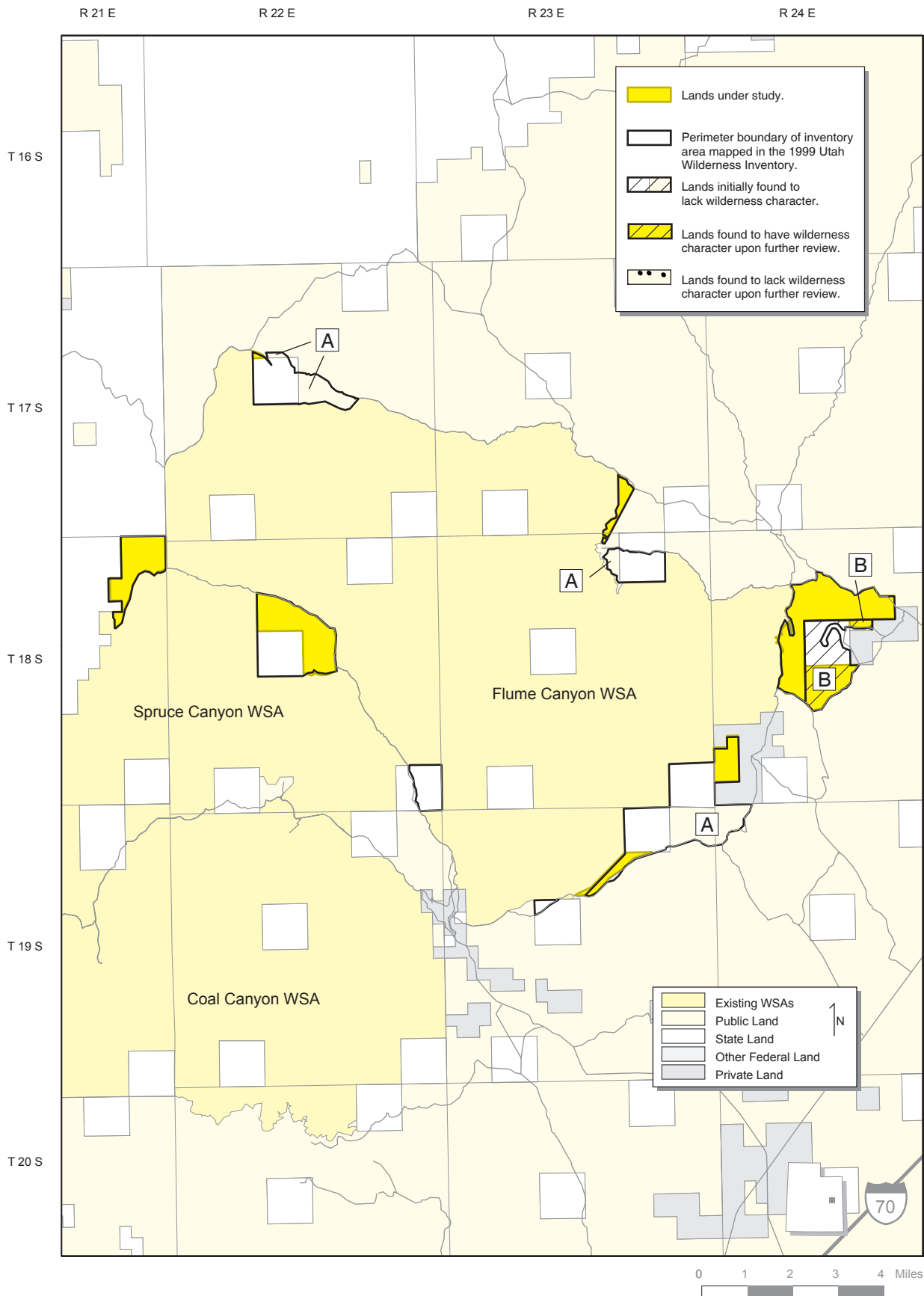
Floy Canyon

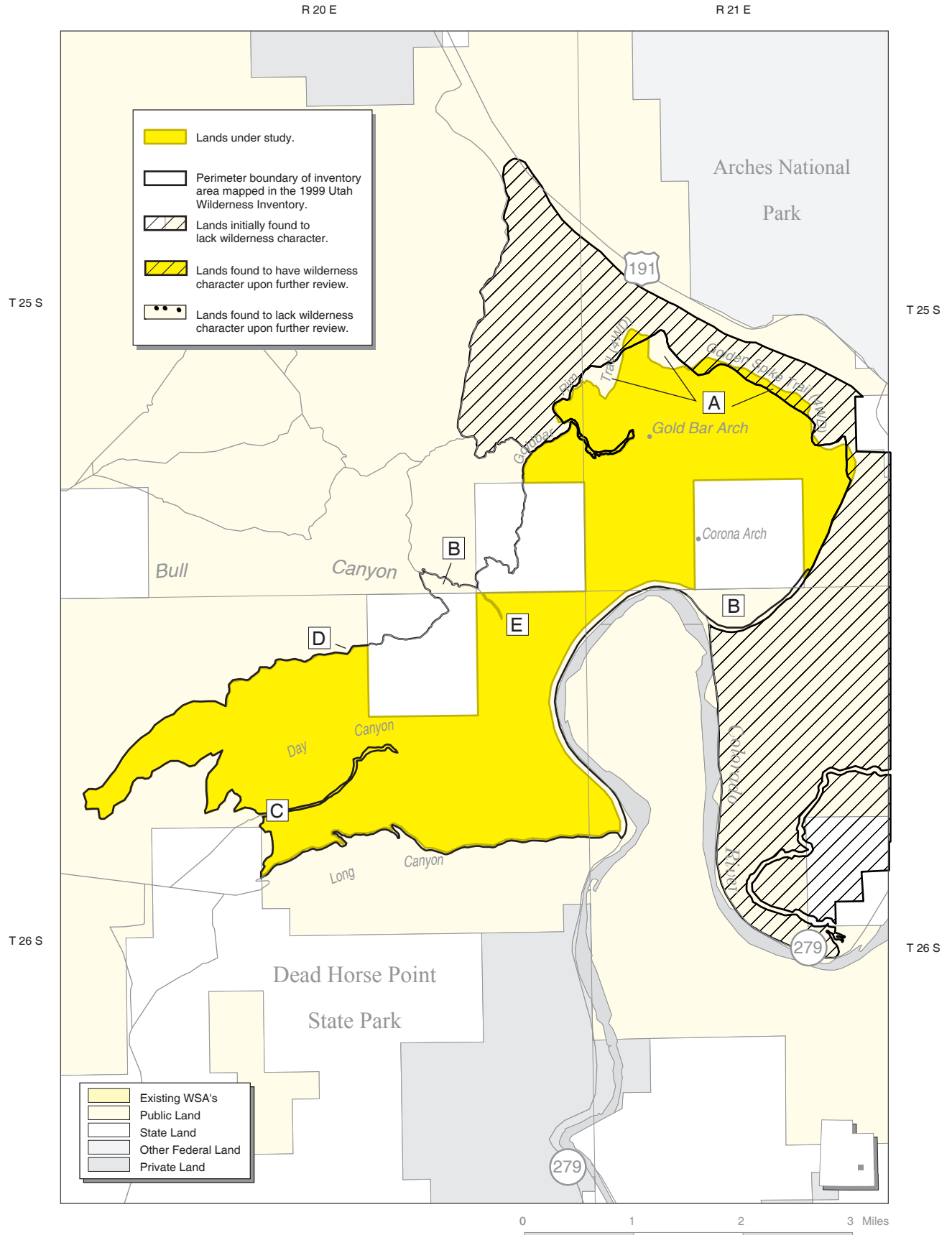
Baseline Modifications



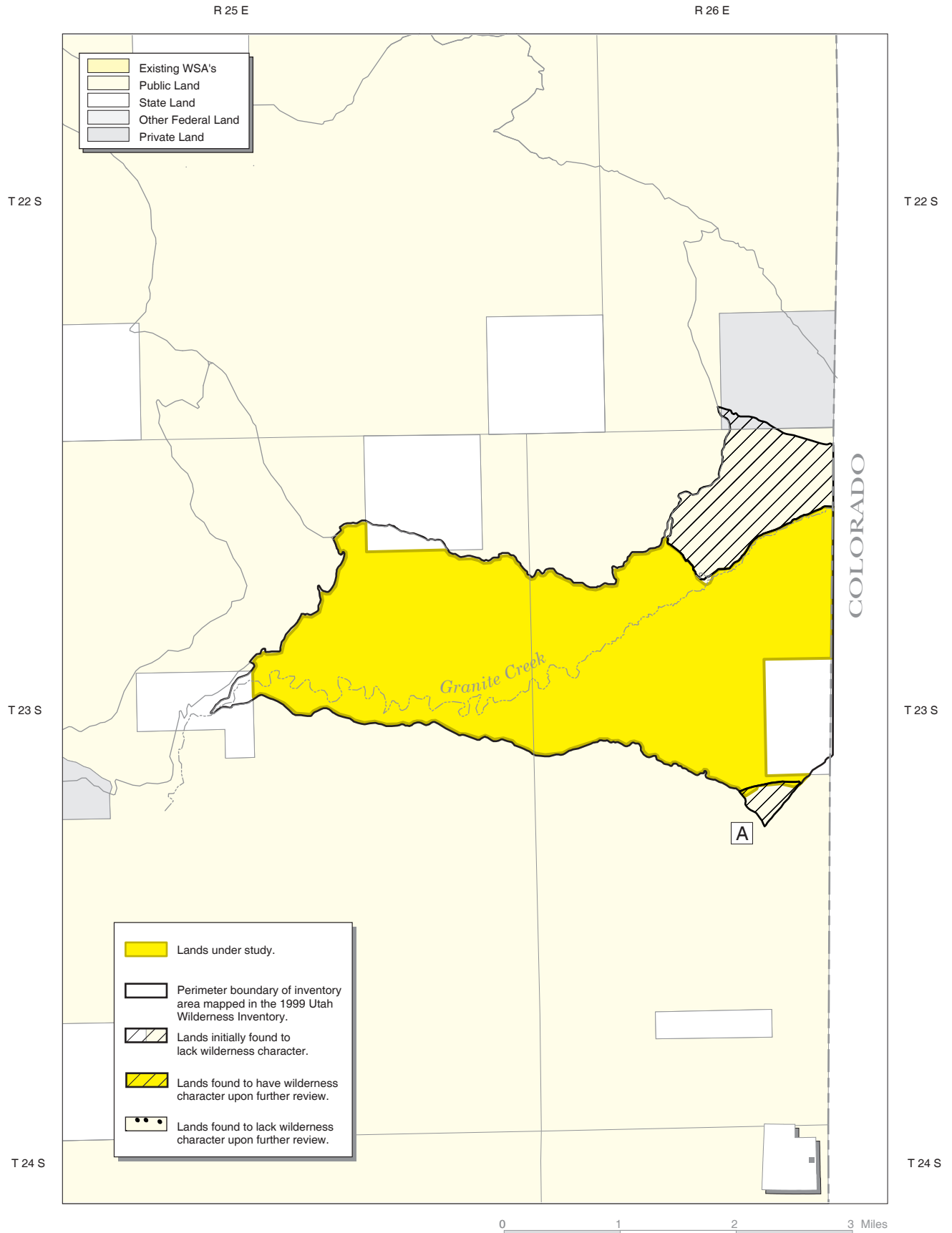
Flume Canyon

Wilderness Character Modifications





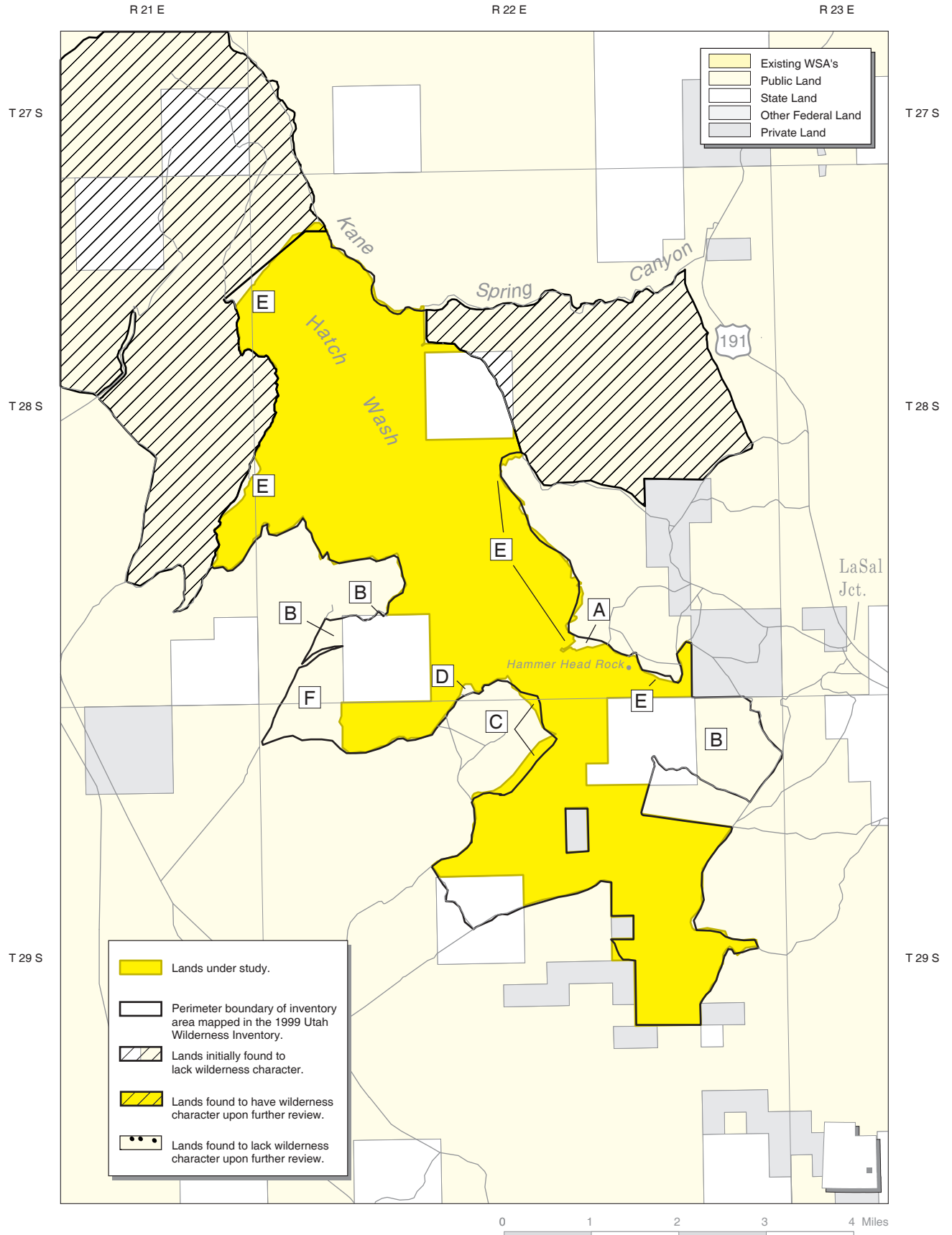
MAP 2.8



MAP 2.9

Hatch Wash

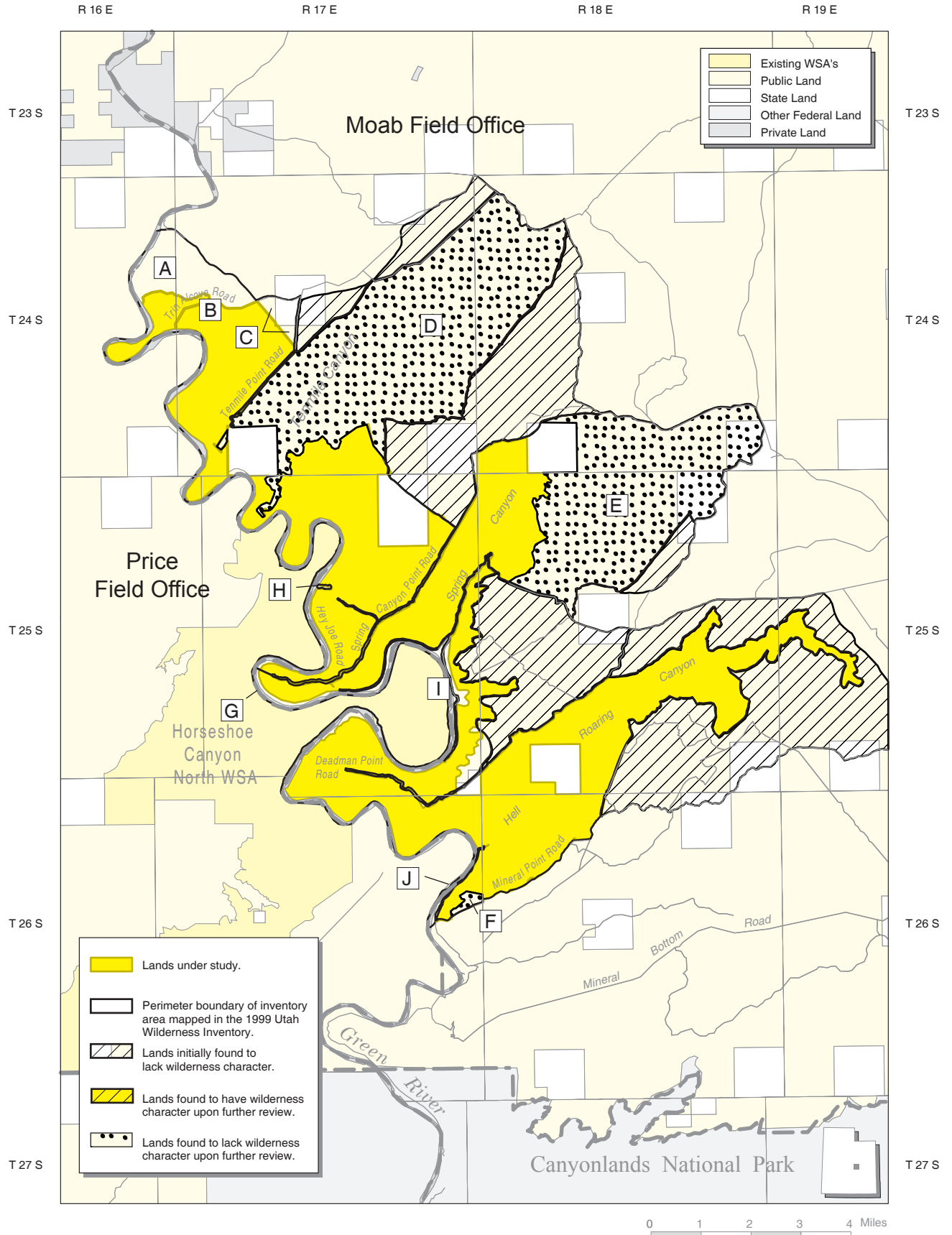
Wilderness Character Modifications



MAP 2.10

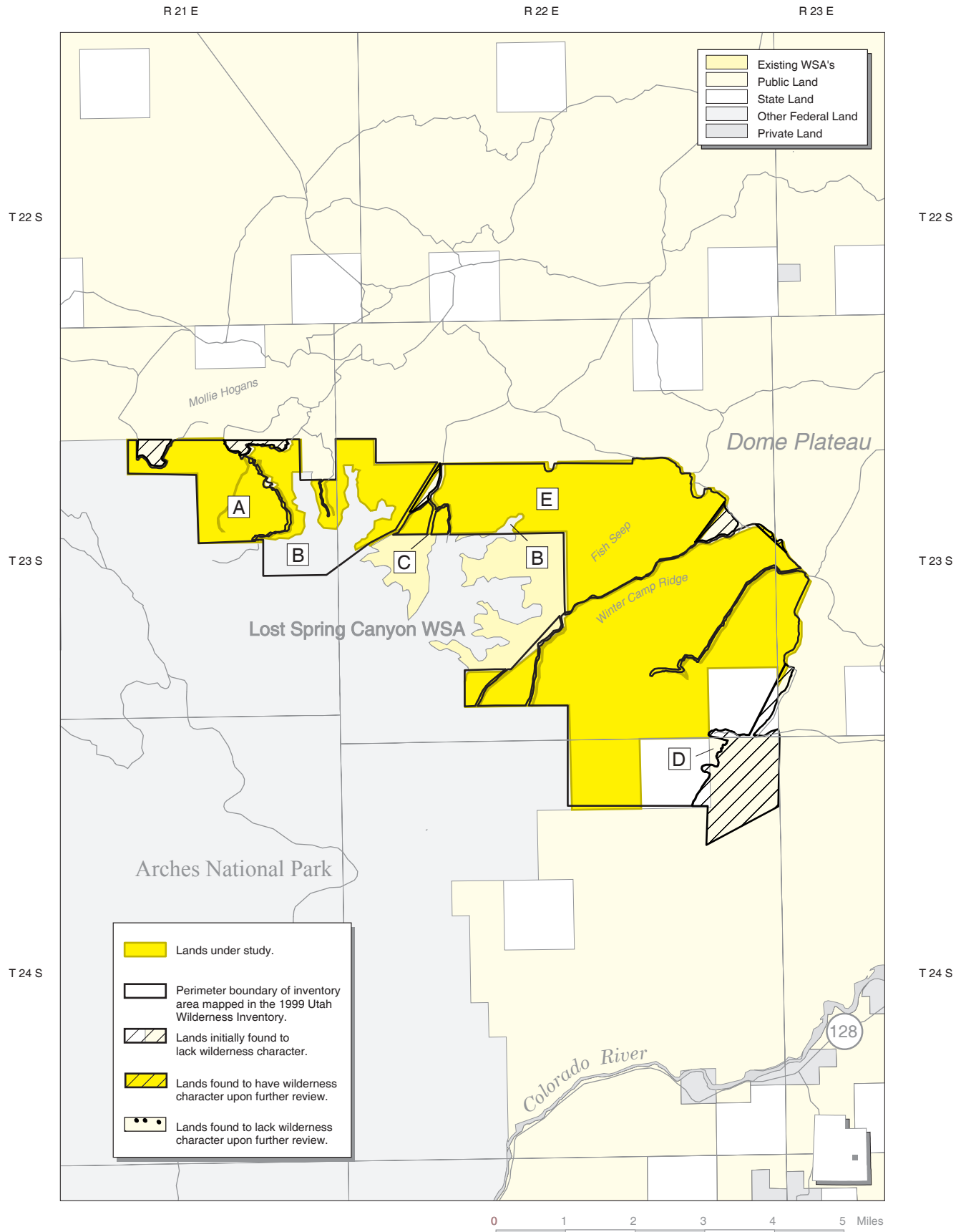
Labyrinth Canyon

Wilderness Character Modifications

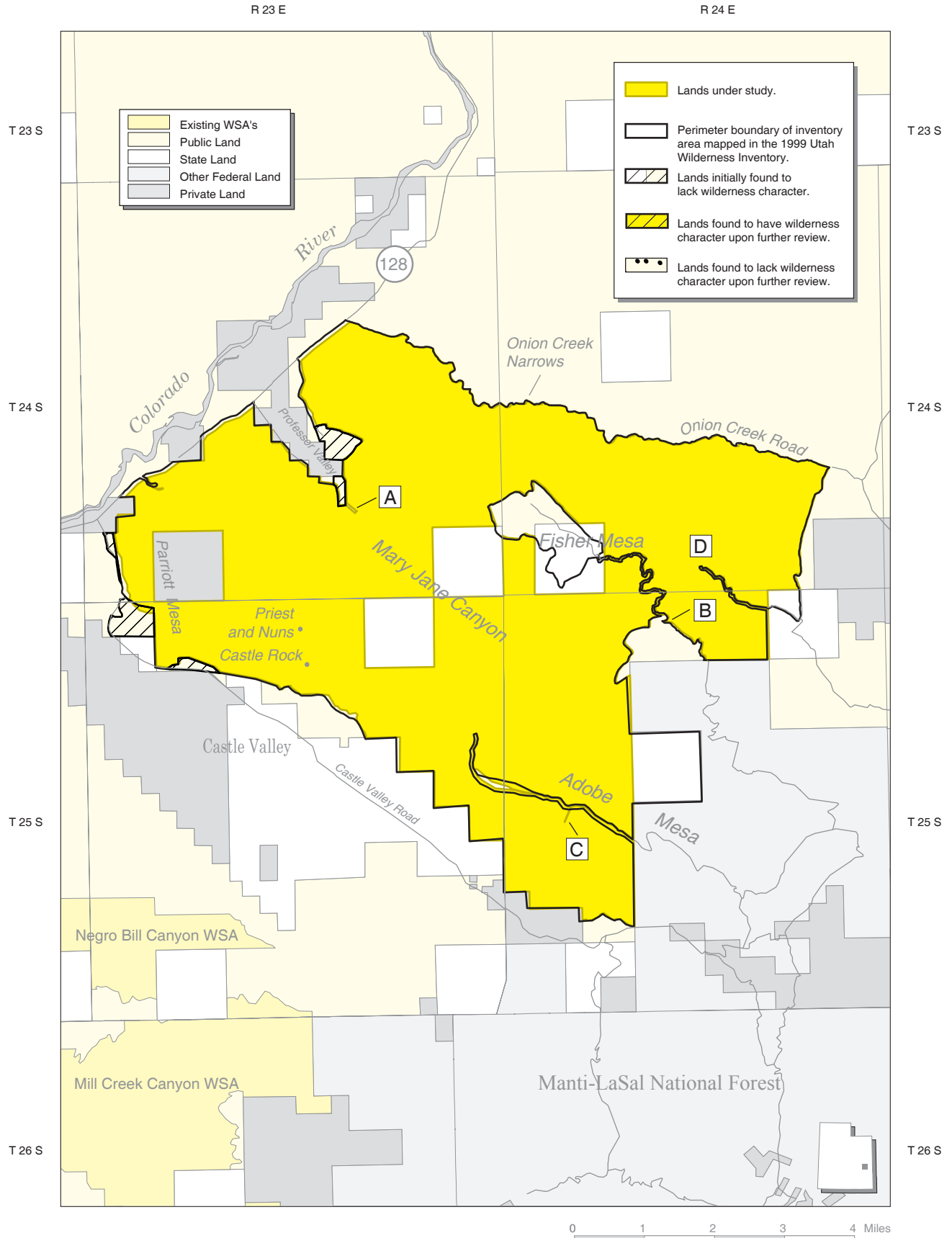


MAP 2.11

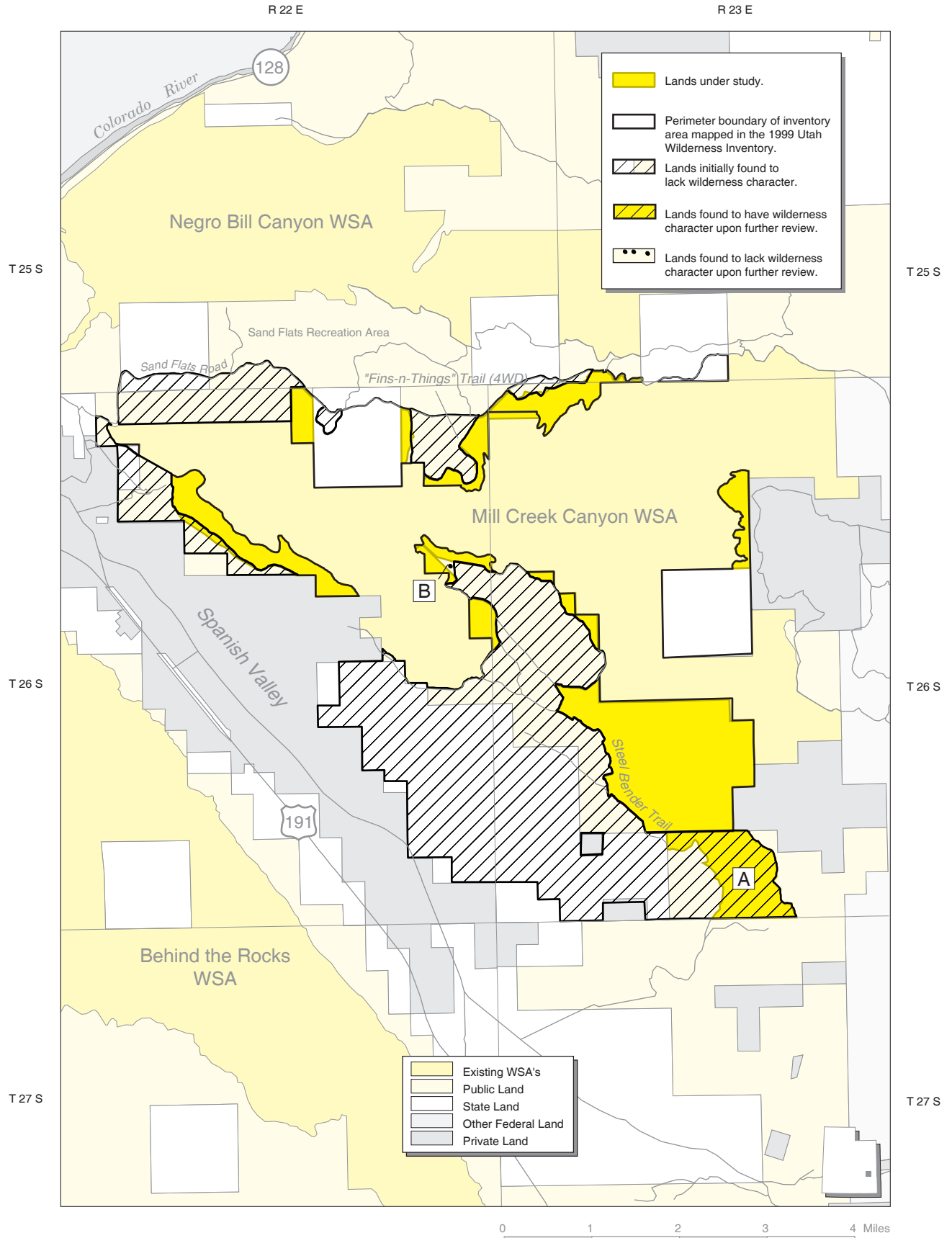
Lost Spring Canyon Wilderness Character Modifications



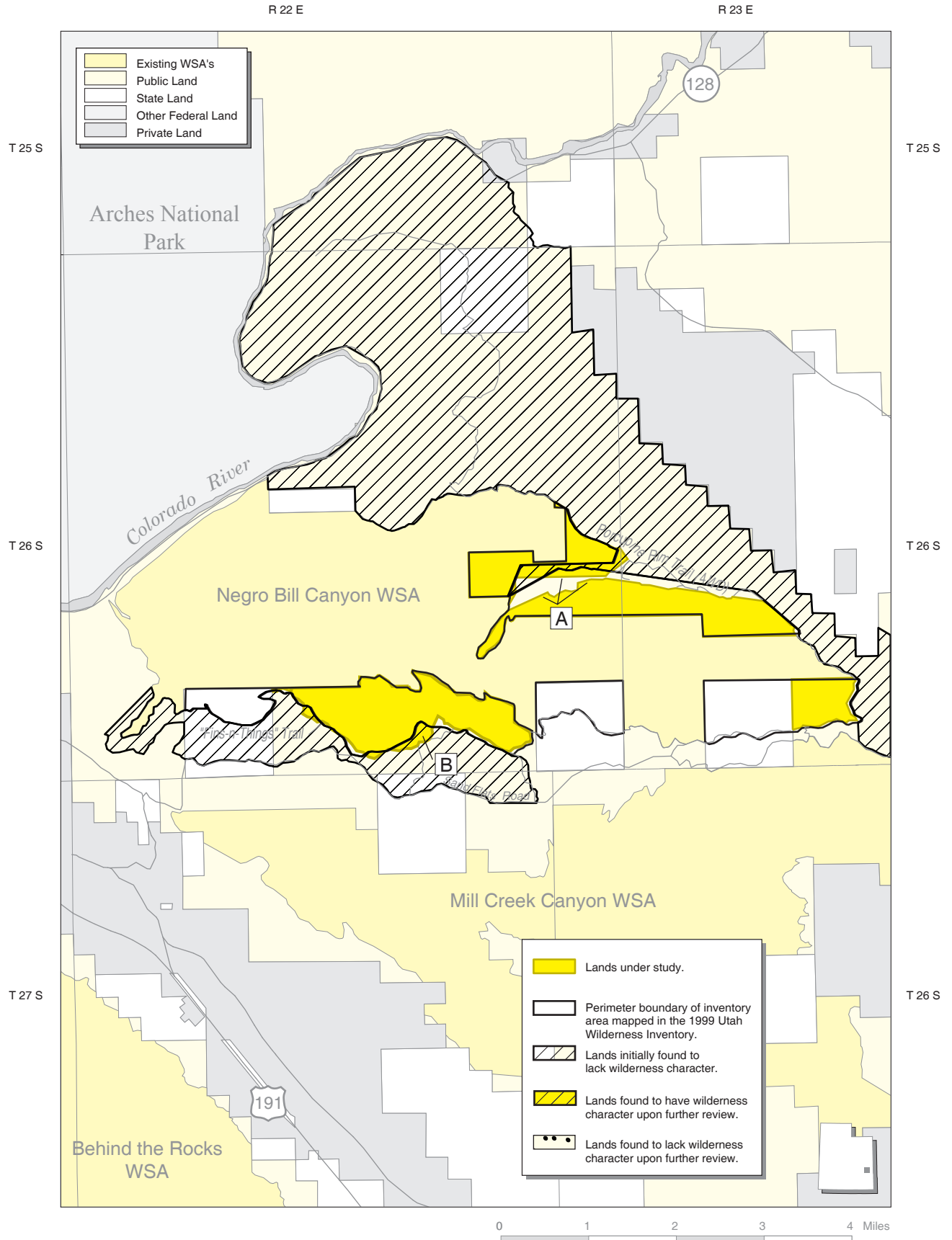
MAP 2.12



MAP 2.13



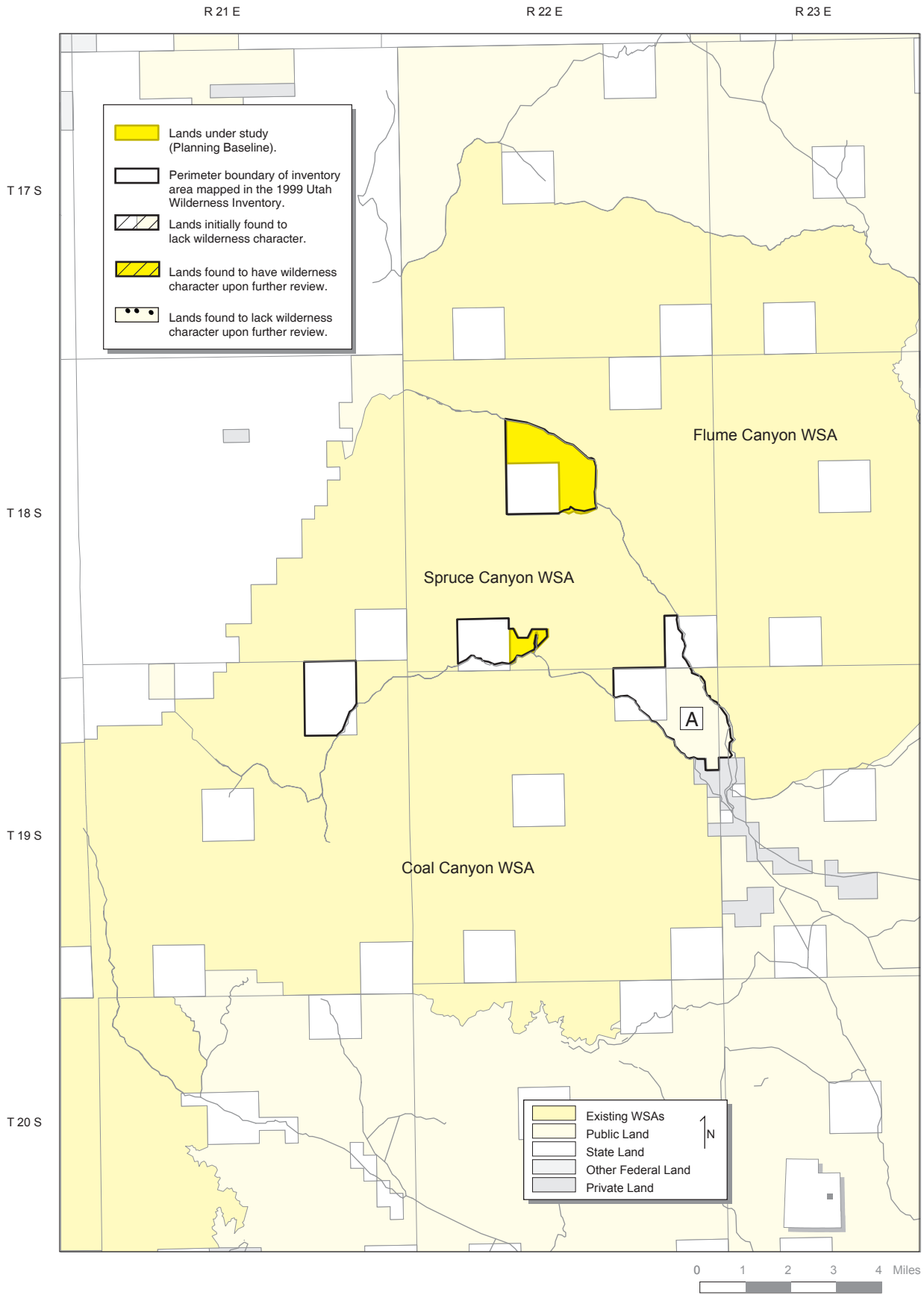
MAP 2.14



MAP 2.15

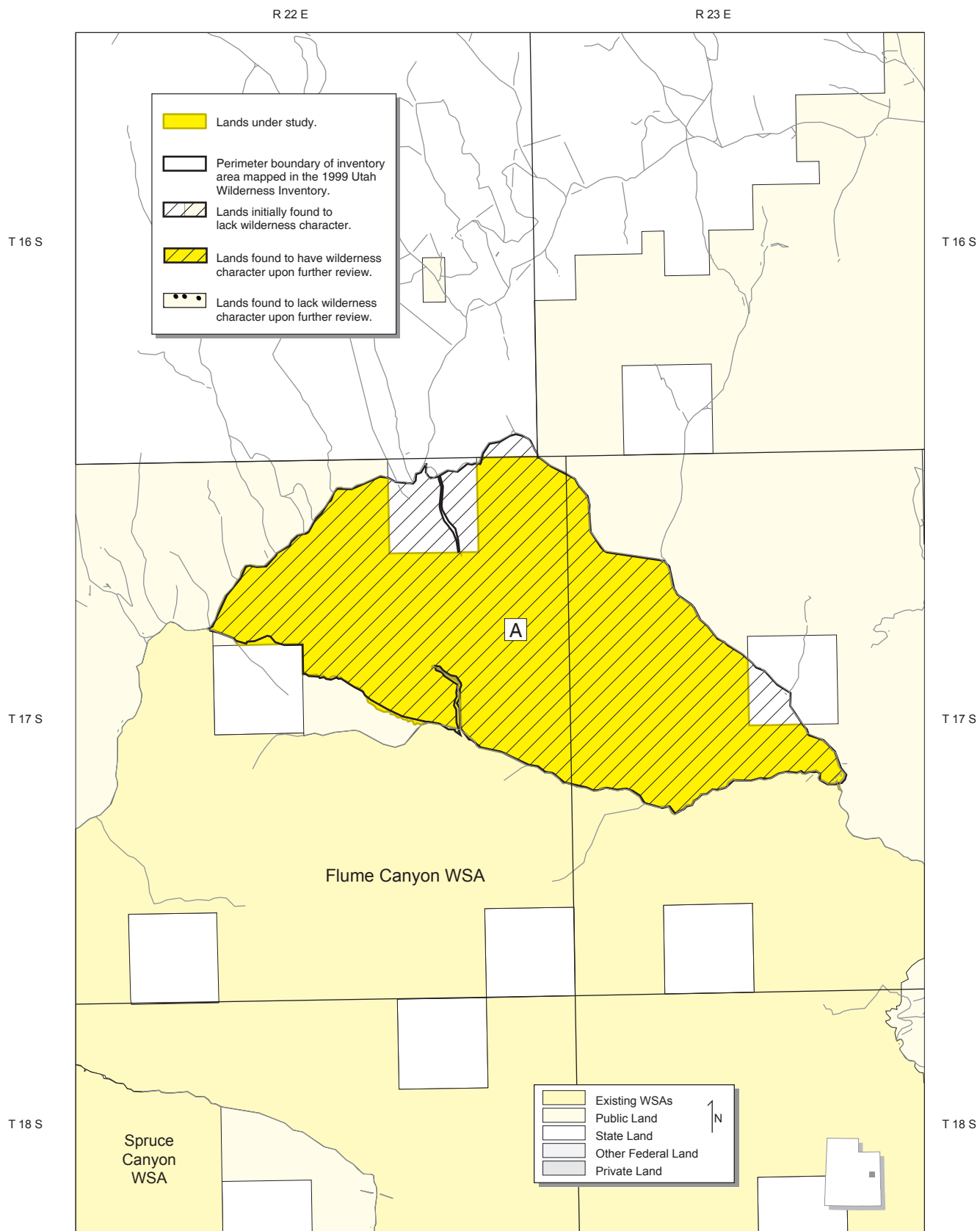
Spruce Canyon

Wilderness Character Modifications



Westwater Creek

Wilderness Character Modifications



Explanation of Acreage Summary Table in this Section

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

Table 2-2: Acreage Summary

Inventory Area	Wilderness Character Acres Identified in the <i>1999 Utah Wilderness Inventory</i>	Revised Wilderness Character Acres
Beaver Creek	26,000	25,722
Behind the Rocks	3,400	3,381
Coal Canyon	12,480	13,850
Desolation Canyon*	10,690	10,498
Fisher Towers	17,000	16,688
Floy Canyon	12,310	9,983
Flume Canyon	4,800	3,563
Goldbar	6,500	6,106
Gooseneck*	800	1,040
Granite Creek	5,400	4,528
Harts Point*	7,000	1,568
Hatch Wash	12,000	10,979
Hunter Canyon	4,600	4,462
Labyrinth Canyon*	42,500	24,300
Lost Spring Canyon	11,770	11,456
Mary Jane Canyon	25,000	24,748
Mill Creek Canyon	2,910	3,394
Negro Bill Canyon	2,500	2,324
Shafer Canyon	1,900	1,845

Inventory Area	Wilderness Character Acres Identified in the 1999 Utah Wilderness Inventory	Revised Wilderness Character Acres
Spruce Canyon	2,320	1,131
Westwater Canyon	2,220	1,193
Westwater Creek	0	8,701
Total	202,350	191,460

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

Section III Inventory-Related Scoping Comments and BLM Responses

The first part of this section of the document contains a series of question and answers designed to address many of the relevant issues, concerns, and questions that were raised during the scoping process.

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

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

How was the inventory completed?

Specific steps taken to conduct the inventory included the following:

- The boundaries of the areas proposed for wilderness designation in legislation before Congress in 1996 (H.R. 1500 and H.R. 1745), including the existing BLM WSA boundaries, were transposed onto recent low-level aerial photographs.
- Trained aerial photography interpreters reviewed each photograph and marked them to identify potential human disturbances. Potential surface-disturbance information was transferred from the aerial photographs to 7.5-minute orthophoto and topographic maps.
- The aerial photographs and maps generated in the first three steps were provided to the inventory teams.
- Team members reviewed available information, such as previous wilderness inventory findings.
- Each inventory area was visited. Field checks were made using helicopter flights, driving boundary roads and vehicle ways within the areas, as well as hiking and mountain biking to remote locations. Surface disturbances were examined and documented. The inventory team was equipped with global positioning system (GPS) units, which use satellite technology to determine locations on the ground. The GPS equipment, in concert with current maps

and aerial photographs, aided the team in documenting the location of surface disturbances, roads and ways, and photo points.

- Roads or vehicle ways identified in the field were documented on field maps, described on road/way analysis forms, and photographed. This documentation was placed in permanent documentation files for each inventory area.
- Other surface disturbances, such as mining impacts and range and wildlife developments, were also documented on field maps and photographed. This documentation was also placed in each permanent documentation file.
- Each permanent documentation file was reviewed by the field team, the team leader, and in some cases the project leader, and a preliminary finding of the presence and/or absence of wilderness characteristics was made.
- A wilderness inventory evaluation was written for each inventory area and included in each permanent documentation file. The project leader signed them after concurrence with the findings regarding whether or not each area, or portions thereof, had wilderness character.

How was the inventory documented?

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

- *Inventory Area Acres.* Acreage totals for the area inventoried, acreage found to possess wilderness characteristics, and acreage found to lack wilderness characteristics are provided.
- *Area Description.* A summary of the inventory area, including its general location, major features, general topography and vegetation, and current and past uses is provided.
- *Wilderness Characteristics.* A general summary of the wilderness characteristics as defined by the *Wilderness Act of 1964* (size, naturalness, outstanding opportunities for solitude or primitive and unconfined recreation, and supplemental values) is provided.
- *Inventory Area Map.* A map of each inventory area depicting lands with or without wilderness characteristics is provided. Contiguous existing WSAs are also shown. Maps in this revision document do not provide the detail or accuracy that are provided on the 7.5-minute topographic maps in each permanent documentation file.

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

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

The BLM's wilderness inventory policy directed teams to use rights-of-way (ROWS) as boundaries of inventory areas. But other valid existing rights, such as

mineral leases, are not criteria used in the inventory, unless those uses resulted in impacts on the ground.

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

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

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

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

How were the boundaries of the inventoried lands determined?

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

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

BLM's focus for the inventory was on areas identified in 1996 by HR 1500 and HR 1745. As the inventory proceeded on the ground, and as determinations were made concerning the existence or absence of wilderness character, boundaries were refined. Boundaries were drawn along roads, edges of disturbance, topographic features, property lines, and others.

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

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

“A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are 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 un-maintained vehicle way, the following definition was used:

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

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

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

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

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

How does the BLM apply the wilderness criterion for size?

The inventory team determined if the inventory area ". . . has at least 5,000 acres of land or is of sufficient size as to make practicable its preservation and use in an

unimpaired condition." Specifically, the size criterion was satisfied in the following situations:

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

How does the BLM apply the wilderness criterion for naturalness?

The inventory team determined if the area ". . . generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable." Findings regarding naturalness were based on the appearance of the area as seen from the ground, by the average visitor. An inventory area did not have to be totally free of human development to be considered natural. Evidence of past human development or activity can be present in an inventory area as long as it is not substantially noticeable.

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

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

How does BLM apply the wilderness criterion for supplemental values?

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

supplemental values did not affect the determination of the existence of wilderness character.

How are sights and sounds outside of inventory areas assessed?

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

Did the inventory designate WSAs?

No. The inventory determined whether certain lands have or do not have wilderness characteristics. It did not alter existing land-use plans or create, enlarge, or diminish existing WSAs.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The tables that follow provide a synopsis of site-specific comments and responses for 21 of the 22 inventory areas in the Moab Field Office (no site-specific comments were received for the Harts Point inventory area within the lands administered by the Moab 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 3.21). Comment numbers are linked to points on the maps to depict the general location of the areas of concern.

BEAVER CREEK (Refer to Map 3-1)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	The BLM incorrectly classified route VKE1B as a road and cherry-stemmed it. This cherry-stem should be removed and the boundary expanded.	VKE1B is a 0.5-mile spur route extending to Granite Creek that is within an area found lacking wilderness character due to the cumulative effects of this road, additional vehicle ways, and other impacts upon natural character.	NO
2	The BLM incorrectly classified routes VKE2A and VKE2B as roads and cherry-stemmed them. The cherry-stems should be removed.	VKE2A and VKE2B are well-established routes that do not meet all criteria of the BLM road definition used for wilderness inventory. Both routes were constructed and receive regular use for recreation and ranching purposes. These vehicle ways constitute substantially noticeable intrusions on wilderness character and were cherry-stemmed.	NO
3	The BLM boundary uses a section line that is not on the edge of a significant impact. The boundary should be moved to include a non-impacted area.	This section line provides the most appropriate boundary configuration. The area to the east contains a chaining, two stock ponds, a fence line and mining disturbances, which cumulatively negate the wilderness character of the area.	NO
4	The BLM uses the 6,000' elevation line as the boundary. The boundary should be expanded to a significant impact.	Lands to the east beyond the 6000' elevation line are outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
5	The BLM uses an insignificant route as the boundary. The boundary should be expanded.	This route marks the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> . Areas to the west were not inventoried and are, therefore, beyond the scope of this planning project.	NO
6	The BLM did not identify a bladed route east of Bridge Canyon.	This route was inventoried and identified as 98-VKS-4 and determined to be a way due to a lack of regular and continuous use or maintenance. It does not meet all criteria of the BLM road definition used for wilderness inventory.	NO

BEAVER CREEK (Refer to Map 3-1)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
7	The BLM uses a section line as a boundary and incorrectly cherry-stems route 98-VKS-3. The boundary should be expanded and the cherry-stem removed.	The section line marks the boundary between BLM lands and state lands that are not part of this planning process. 98-VKS-3 was cherry-stemmed because it is a substantially noticeable intrusion on wilderness character.	NO
8	The BLM incorrectly cherry-stems route VVS98-1A and the cherry-stem should be removed. Another comment stated this cherry-stemmed road should be extended 0.3 miles.	VVS98-1A is a well-established route that was constructed, receives regular and continuous use, with evidence of maintenance by hand tools noted during time of inventory. The road segment is ~1.3 miles after, which, the condition of the road deteriorates and is not, cherry-stemmed.	NO
9	The BLM incorrectly cherry-stems route VVS98-1B and the cherry-stem should be removed.	VVS98-1B is a well-established spur route that accesses a scenic overlook of the Dolores River. While the route does not meet all criteria of the BLM road definition used for wilderness inventory, the vehicle way constitutes a substantially noticeable intrusion on natural character and was cherry-stemmed.	NO
10	The BLM boundary uses a section line that is not on the edge of a significant impact. Route SS1B is wrongly classified as a road. The boundary should be expanded.	The boundary for this portion of the inventory area was set on a wash, a section line, and on road SS1B. This line depicts the edge of disturbance and provides the most appropriate boundary. The route referred to also marks the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
11	The BLM uses insignificant impacts as the boundary. The boundary should be expanded to the west until it intercepts with the next significant impact.	This boundary was set on route VVS98-1D that marks the edge of disturbance between the inventory area and an area that has lost its wilderness character due to seismic lines and vehicle ways to the west.	NO
12	The BLM did not identify a route to an overlook of Thompson Canyon.	VKS3B was inventoried but determined to be a vehicle way due to a lack of regular and continuous use or maintenance.	NO
13	The BLM incorrectly cherry-stems routes 98VKS-1 and VKS-3C. The cherry-stems should be removed.	98VKS-1 and VKS-3C are within an area that has been severed from the inventory area by the exclusion of state lands and is no longer contiguous to the inventory area.	NO
14	The BLM incorrectly classifies route VKS2A as a road and cherry-stems it. Remove the cherry-stem and expand the boundary to a significant impact. Another comment stated that this road extends west to Fisher Creek.	VKS2A is a constructed road that receives regular and continuous use and is maintained to a fence-line gate when needed to keep the road in a usable condition. The segment beyond this point to Fisher Creek was determined to be a way. Lands adjacent to this route were excluded due to an irrigation ditch and an agricultural field, which negate wilderness character.	NO

BEAVER CREEK (Refer to Map 3-1)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
15	The BLM uses a section line as the boundary. The boundary should be expanded.	This boundary is the Utah/Colorado State Line. Public lands outside of Utah were not the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
16	The BLM did not identify numerous routes at the north end of North Beaver Mesa.	Routes CS2B, BC-Grand-C, D, E, and F were inventoried and determined to be vehicle ways. These faint routes do not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
17	The BLM uses an insignificant route as the boundary, and the boundary should be expanded.	On the west side of Polar Mesa, the inventory area boundary follows a well-defined route. This route marks the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
18	The BLM's boundary uses the 6800' elevation line, rather than following significant impacts. The boundary should be expanded to a significant impact.	The boundary in this portion of the inventory area follows the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> . Land to the east was not inventoried during this process.	NO
19	The BLM uses an insignificant route as the boundary. The boundary should be expanded.	This boundary on North Beaver Mesa follows a road identified as BC-00-1, which marks the edge of disturbance between natural areas on the east and mining disturbance on Polar Mesa to the west.	NO
20	The chained area that was excluded due to lack wilderness character is recovering and should be added to the area.	Upon further review, this area on North Beaver Mesa has been added to the area with wilderness character because the impacts from the chaining have naturally reclaimed to a substantially unnoticeable condition.	YES (See "D" on Map 2-1 in Section II.)
21	The BLM uses section lines and a non-substantial way as the boundary. The boundary should be expanded.	The boundary in this portion of the South Beaver Mesa was set using a combination of a segment of the section line in Section 18, topographic features, and a vehicle way. This is the most appropriate boundary to exclude areas no longer natural in character because of extensive mining activity.	NO
22	The BLM should extend the boundary east to the Colorado State Line.	The area immediately east of South Beaver Mesa is impacted by past mineral related activity and is not natural in character.	NO
23	The BLM did not identify a bladed route out to the northwest end of Dolores Point.	The majority of Dolores Point is within the State of Colorado and therefore outside the scope of this inventory.	NO
24	The following areas should be included in the inventory area: Blue Chief Mesa, Polar Mesa, Line Canyon, and Steamboat Point.	These areas are beyond the boundary of the previous legislative H.R. 1500 proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO

BEHIND THE ROCKS (Refer to Map 3-2)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM incorrectly classifies route L1A as a road. The cherry-stem should be removed.	While it does not meet all criteria of the BLM road definition used for wilderness inventory, L1A, constitutes a substantially noticeable intrusion on natural character. L1A is part of The Moab Rim 4WD Trail, a well-known vehicle route that forms the boundary between the existing Behind the Rock WSA, the inventory area, and a portion of the inventory area found lacking wilderness character.	NO
2	<p>BLM used an insignificant route as the boundary. This boundary was established without fieldwork.</p> <p>Another comment stated significant vehicle impacts on White Knuckle Hill, which is adjacent to this route, should be excluded from the inventory area.</p> <p>Another comment stated that a segment of route SJ 116-22, as identified by San Juan County, was not inventoried and should be a road.</p>	Upon further review, routes FS99-1 and FS99-2 (SJ 116-22) have been examined and determined to be ways that provide a definable boundary marking the edge of disturbance separating lands with wilderness character from lands lacking wilderness character. The area to the west (including White Knuckle Hill) was excluded from the area with wilderness character due to a lack of wilderness character.	YES (See "D" on Map 2-2 in Section II.)
3	This boundary is on an insignificant seismic line that is too far north. The boundary should be expanded to the south and west.	The combination of a seismic line and way LL1E99 was determined to be the most appropriate boundary configuration for this part of the inventory area. This boundary marks the edge of disturbance that separates the lands with wilderness character from lands lacking wilderness character (to the south) impacted by seismic lines and ways.	NO
4	The boundary fails to follow the edge of human impacts. The boundary should be expanded to the south.	This boundary was set along a seismic line marking the edge of disturbance that separates the lands with wilderness character from lands lacking wilderness character due to old seismic lines, vehicle ways, and other disturbances.	NO
5	BLM did not inventory two routes identified by San Juan County as SJ 116-20 and SJ 116-21. These routes should be identified as roads.	These old seismic lines, one-time bladed for geophysical survey related to oil and gas exploration, do not receive regular and continuous use or maintenance. These routes, identified by BLM as 99LL1Y and 99LL1Z, are vehicle ways because they do not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
6	Routes LL1A and LL1B should be identified as roads.	LL1A and LL1B are within an area that was found lacking wilderness character.	NO
7	The inventory area boundary should be expanded from its current location along section lines to a road to the east.	These lands are outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> and were not inventoried.	NO

BEHIND THE ROCKS (Refer to Map 3-2)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
8	A spur road to the Moab Rim Arch exists in the inventory area and should not be included in the area with wilderness character.	This route is in the existing Behind the Rocks WSA, and is, therefore, not part of the inventory.	NO
9	The BLM did not identify a gas compressor station just off U.S. Highway 191.	Upon further review, this natural gas compressor station, which was authorized prior to the start of the wilderness inventory, has been excluded from the area with wilderness character.	YES (See "B" on Map 2-2 in Section II.)
10	The BLM did not identify a vehicle route just off U.S. Highway 191.	Upon further review, this 0.1-mile spur route identified as BS-99-1 was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
Comments were received on several routes identified by San Juan County as SJ 116-12 through SJ 116-19. These routes were not inventoried.		SJ 116-12 through SJ 116-19 are either boundaries of, or are internal to, the existing Behind the Rocks WSA and are, therefore, outside the scope of this the inventory.	NO

COAL CANYON (Refer to Map 3-3)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	The route separating Coal and Spruce Canyon WSAs is just a trail; the two units should be combined.	Changing the boundaries of these existing WSAs is beyond the scope of the <i>1999 Utah Wilderness Inventory</i> .	NO
2	The boundary follows section lines, and does not extend to the edge of naturalness.	This area is outside of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
3	The boundary stops at an impassable, unused route, and does not extend to the edge of naturalness.	This area is outside of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
4	The boundary follows section lines, and does not extend to the edge of naturalness.	Upon further review, the wilderness character boundary has been adjusted to follow intrusions that mark the edge of disturbance.	YES (See "C" on Map 2-3 in Section II.)
5	The boundary follows section lines, and does not extend to the edge of naturalness.	Upon further review, the wilderness character boundary has been adjusted to follow a series of old ways, roads, and seismic lines to define the edge of impacts.	YES (See "B" on Map 2-3 in Section II.)
6	The boundary stops at an insignificant route, and does not extend to the edge of naturalness.	This area is outside of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
7	BLM has incorrectly cherry-stemmed the route going up Nash Wash.	This route is within the existing WSA and was not evaluated as part of the <i>1999 Utah Wilderness Inventory</i> .	NO

DESOLATION CANYON (Refer to Map 3-4)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM did no fieldwork along this route and did not complete a road/way form. This route is improperly cherry-stemmed, it is not mechanically maintained nor a significant impact.	This route was inventoried and determined to be a road because it meets all criteria of the BLM road definition used for wilderness inventory purposes.	NO

FISHER TOWERS (Refer to Map 3-5)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	There are OHV trails within the area off the Entrada Bluffs road.	The area west of this road was inventoried and found to have wilderness characteristics. One vehicle way was noted on the field map.	NO
2	Two bladed spur routes exist in the northwest corner of the Fisher Valley quadrangle map.	These two routes were inventoried and identified on the inventory map. Both routes were determined to be vehicle ways because they do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
3	A "poor road" exists east of the Top of the World trail.	Only a few minor disjointed segments of this route were identified on the ground, and it was not identified as a road or a way for vehicle travel.	NO
4	There are two spur routes near Cowskin Spring.	These two routes, identified by BLM as LS99-5, have been inventoried and determined to be roads because they were constructed, receive regular and continuous use, and receive periodic maintenance to keep them in a useable condition.	YES (See "B" on Map 2-5 in Section II.)
5	The road to a drill hole in Richardson Amphitheater was not identified by BLM.	Upon further review, this road has been identified as LS99-6, and cherry-stemmed. The cherry-stem includes a stock pond and drill pad associated with this road.	YES (See "D" on Map 2-5 in Section II.)
6	There is a spur road east of Waring Canyon that was not identified by BLM.	This route, identified by BLM as LS99-4, was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. LS99-4 does not receive maintenance or regular and continuous use.	NO
7	There are several roads outside of the "hole" (the area lacking wilderness character) around the "Top of the World" trail.	Upon further review, two un-maintained, little-used routes were identified as LS99-1 and LS99-2. Both were determined to be ways because they do not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
8	BLM incorrectly found this area not to have wilderness character. All the impacts in the area are insignificant. The BLM field map shows a southern route as having been bladed. It has not been mechanically maintained.	The inventory found several seismic lines and vehicle ways, which cumulatively impact the natural character of the area. Therefore, the area was found to lack wilderness character.	NO

FISHER TOWERS (Refer to Map 3-5)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
9	BLM has failed to inventory the roadless area. The boundary follows an arbitrary section line. There are insignificant impacts in area. The boundary should be expanded to the east.	This area is beyond the boundary of the previous H. R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
10	The BLM has failed to document or inventory a route that is southwest of Richardson Amphitheater.	Upon further review, this route, identified as FT2000-A, was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. This way was not constructed or maintained.	NO

FLOY CANYON (Refer to Map 3-6)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM should combine the Floy Canyon and Desolation Canyon units, since there is no physical barrier separating the two units.	Changing the boundaries of these existing WSAs is beyond the scope of the <i>1999 Utah Wilderness Inventory</i> .	NO
2	The BLM failed to identify a mapped spur east of Crescent Canyon.	This route was inventoried and determined to be a way, because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
3	The BLM failed to identify a spur to an overlook of Hatch Mesa.	This route was inventoried and determined to be a way, as it fails to meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
4	The BLM failed to identify two spurs running towards Hatch Mesa.	These routes were inventoried and determined to be ways, as they fail to meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
5	The BLM failed to identify a constructed road connecting with a spur to an overlook of Hatch Mesa.	This route was inventoried and determined to be a way, as it fails to meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
6	BLM should cherry-stem the Thompson Canyon route.	This route is entirely in the WSA, and shown as a vehicle way on the original BLM WSA maps. As such, it is unaffected by the current inventory.	NO

FLUME CANYON (Refer to Map 3-7)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM should combine the Flume Canyon and Spruce Canyon units, since there is no physical barrier separating the two units.	Changing the boundaries of these existing WSAs is beyond the scope of the <i>1999 Utah Wilderness Inventory</i> .	NO

FLUME CANYON (Refer to Map 3-7)			
2	The boundary fails to follow the edge of significant impacts, and should be expanded to the edge of naturalness.	Upon further field review, the wilderness character boundary has been adjusted to follow a constructed and maintained county road in section 21.	YES (See “B” on Map 2-7 in Section II.)
3	The BLM uses an insignificant route and an arbitrary line as the boundary. The boundary should be expanded to the edge of naturalness.	This route is on State land and is beyond the scope of the inventory. The area between Westwater Creek and Pipeline Canyon was determined to have wilderness character but has been severed by State land and is not part of the area with wilderness character.	NO

GOLDBAR (Refer to Map 3-8)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	<p>The Day Point cherry-stem should be extended to the overlook of Day Canyon and the Colorado River.</p> <p>Another comment stated the Day Point cherry-stem should be removed.</p> <p>Another comment stated the Day Point cherry-stem should be to the first drill hole only.</p>	Upon further review, the Day Point route, identified FS1A, was determined to be a vehicle way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. The segment to a substantially noticeable drill pad has been cherry-stemmed, because over this length, the route receives regular use and constitutes a substantially noticeable impact on wilderness character. Beyond the drill pad, the vehicle way receives little use, is difficult to see because of the rough terrain, and has not been cherry-stemmed.	YES (See “C” on Map 2-8 in Section II.)
2	The Gold Bar Arch route should not be cherry-stemmed.	This 1.5-mile route, identified as FT1C, was inventoried and determined to be a road because it meets all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
3	The route up Day Canyon is passable by motorcycles.	Upon further review, this path, identified as VK2000-1, was examined and identified as a hiking trail. A locked gate and a thicket of tamarisk that encloses the entire entrance to Day Canyon for approximately 0.5 miles, effectively prohibits vehicle traffic on the path.	NO
4	The “Rusty Nail” route should be cherry-stemmed from the area.	Upon further review, route SS00-1 was determined to be a vehicle way because it was not constructed and is not maintained. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
5	Two comments were received stating that the Poison Spider and Golden Spike 4WD Trails should not be closed.	These routes are not within the inventory area. The Golden Spike 4WD Trail forms a portion of the boundary and the Poison Spider 4WD Trail is not within the inventory area. Use of these routes for vehicle access is not affected by this study.	NO
6	There is a jeep route to the Bull Canyon overlook that was not identified by the BLM.	This route is entirely on state land and is beyond the scope of this inventory.	NO

GOOSENECK (Refer to Map 3-9)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	A route identified by San Juan County as SJ 114-11 was not inventoried nor recognized by the BLM. The route should be determined to be a road.	The spur route that parallels the main boundary a short distance was noted on the inventory map 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.	NO
2	A route identified by San Juan County as SJ 114-10 was not inventoried nor recognized by the BLM. It should be determined to be a road.	The Potash Road (SJ 144-10) was noted on the inventory maps and used as a boundary for this inventory area. The Potash Road was identified as a portion of the boundary of the previous H.R. 1500 legislative proposal.	NO
3	BLM's boundary excludes insignificant impacts. The area was closed to vehicle travel by BLM, and it should be added to the inventory area.	This area is beyond the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
4	BLM's boundary excludes insignificant impacts and many non-impacted areas. The boundary should be redrawn to exclude only the impacted areas.	The natural character of the area north of the Colorado River has been significantly impacted from past potash mining, stock pond construction, old petroleum exploration, film location access, and the use of vehicles for camping, sightseeing, and off-road driving. In addition, this area is not contiguous to other wilderness character lands and it is of insufficient size to be considered as a "stand-alone" area.	NO
6	The proposed area is too small in size to qualify for WSA study.	The area is contiguous to lands administratively endorsed for wilderness by Canyonlands National Park; therefore it does meet the size criteria for possessing wilderness characteristics.	NO

GRANITE CREEK (Refer to Map 3-10)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM incorrectly classifies route HS1B as a road and uses it as the boundary. The Road/Way form indicates the route is not maintained and not a significant impact. The cherry-stem should extend only to the dugway and the segment of the route parallel to the creek should not be cherry-stemmed. The boundary should be expanded northward. Another comment was received stating that route HS1B should be kept open to vehicle traffic.	This route is a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. It is not cherry-stemmed; however, it does form a portion of the boundary of the inventory area. It is an appropriate boundary in this instance because it marks the edge of disturbance, separating the lands with wilderness character from those found lacking wilderness character to the north. The lands were found to lack wilderness character because of cumulative impacts associated with a recent brush cutting project, other vehicle ways, and a nearby ranching operation. Use of this route for vehicle access is not affected by this inventory.	NO

GRANITE CREEK (Refer to Map 3-10)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
2	The BLM should cherry-stem the route from Steamboat Mesa to the Dolores River.	The area is beyond 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 BLM should add the Big Triangle area to the inventory area.	The area is beyond the boundary of the previous H. R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO

HATCH WASH (Refer to Map 3-11)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM uses an old seismic line as a boundary that excludes Hatch Point. The area has some minor impact areas that are not substantial. Route VKS-3 is incorrectly classified as a road. The boundary of the area with wilderness character should be extended to the north.	This seismic line marks the edge of disturbance separating lands with wilderness character from the area that was found lacking wilderness character due to the cumulative impacts of bladed routes, seismic lines, mineral exploration lines, maintained stock ponds, and a large drill pad. Route VKS-3 was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
2	There are several seismic routes that are passable by vehicles within the area found to have wilderness character as shown on the Trough Springs topographic map.	The seismic lines referred to in the comment are within an area found lacking wilderness character, and are not part of the area with wilderness characteristics.	NO
3	Three bladed roads exist on Flat Iron Mesa.	Upon further review, two routes have been identified as SB99-8 and SB99-9. They were not constructed or maintained and were determined to be ways because they do not meet all criteria of the BLM road definition used for wilderness inventory purposes. The other route is located on state land and is not part of the area with wilderness characteristics.	NO
4	A route identified by San Juan County as SJ 117-35 was not inventoried or recognized by the BLM. This route should be determined to be a road. Other comments referred to this route by a legal description or as a road that was east of Trout Water Canyon to a viewpoint.	Upon further review, this faint route was identified as SB99-2 and noted on the inventory map. It was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. This way does not receive maintenance or regular and continuous use.	NO
5	A route identified by San Juan County as SJ 117-40 was not inventoried or recognized by the BLM. This route should be determined to be a road.	Upon further review, this faint route identified as SB99-3, was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. It was not constructed, not maintained, nor does it receive regular or continuous use.	NO

HATCH WASH (Refer to Map 3-11)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
6	BLM did not inventory west of a minor route to any significant impacts. This left an entire roadless area un-inventoried. The boundary should be expanded.	This route was inventoried and noted on the inventory maps. It was determined to be a vehicle way that provides a distinct feature and the most appropriate boundary configuration for this part of the wilderness inventory area.	NO
7	BLM uses a non-substantial route as the boundary. No fieldwork was done or Road /Way forms completed. The entire roadless area was not inventoried. The boundary should be expanded.	The lands to the east of the boundary extend beyond the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
8	A route identified by San Juan County as SJ 117-36 was not inventoried or recognized by the BLM. This route should be determined to be a road.	Upon review, this route was identified as SB99-1, and determined to be a way south of the stock pond. Recent activity in this area has required an additional field review, this review determined the way segment of SB99-1 has been re-graded and maintained. The graded segment has been identified as HWS-1 and determined to be a road.	YES (See "F" on Map 2-10 in Section II.)
9	There are portions of seven bladed routes northeast of benchmark "Cane 6224."	This area has been inventoried. With the exception of vehicle way SB99-1 referred to in #8, all vehicle routes found were located outside of the inventory area.	NO
10	A route identified by San Juan County as SJ 117-37 was not inventoried or recognized by the BLM. This route should be determined to be a road.	This faint route was identified by BLM on the inventory maps and inventoried as Route B. It was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. This way does not receive maintenance or regular and continuous use.	NO
11	There is a loop road to a viewpoint in Section 34 above Hatch Wash.	The referenced route is the boundary of the inventory area. Its location was incorrectly shown in the <i>1999 Utah Wilderness Inventory</i> . This mapping error has been corrected.	YES (See "A" on Map 2-10 in Section II.)
12	The "Mushroom Rock" aka "Hammerhead Rock" jeep loop route should be excluded from the area found having wilderness character.	HW-15 was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. It is within the area found to have wilderness character.	NO
13	BLM selected an insignificant route as the boundary of the area, leaving an entire roadless area un-inventoried. The boundary should be expanded.	Upon further review, this vehicle way, identified as SB-00-1, marks the edge of disturbance and provides a distinct feature. It is the most appropriate boundary configuration in this area.	NO
14	There is a mapped road emerging from Section 2.	This route is an extension of HW-12. It was identified and determined to be a way because it does not meet all the criteria of the BLM road definition used for wilderness inventory purposes.	NO

HATCH WASH (Refer to Map 3-11)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
15	<p>Routes HW-12 and HW-13 should be determined to be roads.</p> <p>Another comment was received stating that neither route was identified nor inventoried.</p>	<p>With the exception of a portion of HW-12 discussed in #14, these routes are located on State land and BLM lands that are not contiguous to the wilderness inventory area and, therefore, are not under consideration in this inventory.</p>	NO
16	<p>BLM uses routes HW-13 and HW-14 as the boundary. No inventory was done past these non-substantial routes. The boundary should be expanded.</p>	<p>The area bounded by HW-13 and HW-14 is beyond the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i>.</p>	NO
17	<p>The BLM missed two routes to a private 80-acre in-holding.</p> <p>Another comment stated that one of the routes, identified by San Juan County as SJ 117-38, was not inventoried or recognized by the BLM. This route should be determined to be a road.</p>	<p>Upon further review, routes SB99-4 (SJ 117-38) and SB99-5 were originally constructed, both routes are rough, do not receive regular or continuous use, and are not maintained. These routes were determined to be ways because they do not meet all criteria of the BLM road definition used for wilderness inventory purposes.</p>	NO
18	<p>There are seven bladed routes in Sections 11 and 14.</p> <p>Two other comments were received identifying routes not identified or inventoried in these two sections.</p>	<p>Four of these routes are re-vegetating seismic lines and are not considered to be vehicle routes. Two routes have been identified as ways because they are little used, un-maintained, and therefore, do not meet all criteria of the BLM road definition used for wilderness inventory purposes.</p>	NO
19	<p>BLM selected an insignificant route as the boundary of the area, leaving an entire roadless area un-inventoried. The area to the west is free of any significant impacts and the boundary should be expanded.</p>	<p>This area is outside of the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i>. Part of the area is on State land that is also outside the scope of this inventory.</p>	NO
20	<p>BLM incorrectly classified routes HW-7 and HW-8 as roads and used them as the boundary. The boundary should be expanded.</p>	<p>These two connecting routes were inventoried and identified as discernable vehicle ways that mark the edge of disturbance. They form the most appropriate boundary configuration for this part of the inventory area.</p>	NO
21	<p>There is a cow camp in T 29 S, R 22 E, Sec. 23.</p> <p>Another comment identified several facilities in connection with the cow camp.</p>	<p>The camp is not within the portion of the inventory area with wilderness character.</p>	NO
22	<p>There are various livestock reservoirs in this area.</p>	<p>Trout Water #2 (Range Project #6350), Hatch Point Rock Tank #1 (Range Project #4957) and Trout Canyon #2 (Range Project #241) reservoirs are not located in the inventory area.</p> <p>West Coyote #3 (Range Project #5525) and Hatch</p>	NO

HATCH WASH (Refer to Map 3-11)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
		Point Reservoir (Range Project #545) were noted during inventory; however, these small stock ponds do not significantly impact the natural character of the area.	
23	A road in Little Water Creek was not inventoried or recognized by the BLM.	This vehicle route was identified on the field map during the <i>1999 Utah Wilderness Inventory</i> and was determined to be a way. No designation was given to the route.	NO

HUNTER CANYON (Refer to Map 3-12)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM incorrectly classified routes VKS1A and VKS1B as roads and cherry-stemmed them. The cherry-stems should be removed.	While these vehicle ways do not meet all criteria of the BLM road definition, they are well established and constitute substantially noticeable impacts on wilderness character.	NO
2	A route identified by San Juan County as SJ 118-6 was not inventoried or recognized by the BLM. This route should be a road	This route was noted on the inventory map and forms part of the eastern boundary of the inventory area.	NO
3	A route identified by San Juan County as SJ 118-7 was not inventoried or recognized by the BLM. This route should be a road.	SJ 118-7 was noted on the inventory map and forms part of the southwestern boundary of the inventory area. This route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
4	A route identified by San Juan County as SJ 118-8 was not inventoried or recognized by the BLM. This route should be a road.	This faint, little-used vehicle route was inventoried and noted on the field inventory map. It was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO

LABYRINTH CANYON (Refer to Map 3-13)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	A seismic line is used as the boundary, leaving a roadless area not inventoried. The boundary should be expanded.	Upon further review, the boundary has been changed in this area to follow the full extent of the seismic line as the boundary. This seismic line was determined to be a road on the southern end and a vehicle way on the northern end, and marks part of the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> . The route separates the lands found to have wilderness character from those lacking wilderness character and provides the most appropriate boundary configuration at this location.	YES (See "C" on Map 2-11 in Section II.)

LABYRINTH CANYON (Refer to Map 3-13)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
2	A seismic line is used as the boundary, leaving a roadless area not inventoried. The boundary should be expanded.	Upon further review, the wilderness character boundary has been adjusted to separate lands found to have wilderness character from those lacking wilderness character due to the cumulative impact of numerous vehicle ways, seismic lines, drill holes, range developments, mining disturbances, and other man-made intrusions east of the Ten Mile Point Road.	YES (See "D" on Map 2-11 in Section II.)
3	The boundary fails to follow the edge of significant impacts. It should be expanded, and the impacts cherry-stemmed where appropriate.	This area lacks wilderness character due to the cumulative impacts of numerous vehicle ways and seismic lines. There is also an active oil well in the vicinity.	NO
4	This route gets some traffic but is not maintained. The route has been improperly cherry-stemmed, and the cherry-stem should be eliminated.	Upon further review, this road, identified as AV-2000, is the main access for the Bike and Hike Trail to Hey Joe Canyon and meets all criteria of the BLM road definition used for wilderness inventory purposes.	NO
5	BLM uses a canyon rim as the boundary, omitting a natural area. The area to the east of the canyon rim should be reconsidered and the boundary expanded.	The canyon rim provides the most appropriate boundary configuration at this location because of a complex network of seismic lines and frequently-traveled vehicle ways that, cumulatively, render the area unnatural and lacking wilderness character.	NO
6	Blading down Spring Canyon allows more OHV traffic. The route to the north around Bowknot Bend should be closed to motorized traffic to allow the Colorado River to remain quiet and natural. The cherry-stem should be eliminated.	The route from the middle to lower part of Spring Canyon is cherry-stemmed to the Green River. Vehicle use is allowed on this route. SCB3 is a 3.7-mile road to Hey Joe Mine. It was determined to be a road, and cherry-stemmed, because it meets all criteria of the BLM road definition used for wilderness inventory purposes.	YES (See "G" on Map 2-11 in Section II.)
7	The route to the south of Spring Canyon, around Bowknot Bend, should be closed and the cherry-stem eliminated.	SCB1 was determined to be a way. Upon further review, the first 2.8 miles were excluded from the area with wilderness characteristics due to numerous mining impacts along the route. Use of this route for vehicle access is not affected by this inventory.	YES (See "T" on Map 2-11 in Section II.)
8	BLM uses the canyon rim as the boundary instead of significant impacts. The boundary should be expanded.	The canyon rim provides the most appropriate boundary configuration at this location because of a complex network of seismic lines and frequently-traveled vehicle ways to the south and east of Hell-Roaring Canyon that cumulatively impact wilderness character.	NO
9	This route is cherry-stemmed too far. Correct the length of the cherry-stemmed route.	The Deadman Point Road is cherry-stemmed to the appropriate point because it meets all criteria of the BLM road definition used for wilderness inventory purposes.	NO
10	The boundary fails to use an impact as a boundary by going over the cliff and along the	The boundary has been adjusted to exclude a mining disturbance. It follows the rim of the canyon to the mining disturbance and then follows	YES (See "F" on Map 2-11 in Section II.)

LABYRINTH CANYON (Refer to Map 3-13)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	Green River. The boundary should be expanded to include the entire roadless area.	the Mineral Point Road to Mineral Bottom. This was determined to be the most appropriate boundary configuration because it separates the area with wilderness character from that lacking wilderness character on Mineral Point due to mining disturbances.	
11	The BLM missed or mis-classified various routes in the Labyrinth Canyon inventory area. Another comment was received stating that BLM should exclude the mesa tops from the inventory area because of vehicle impacts.	The boundaries of the area with wilderness character within the Labyrinth Canyon inventory area have been adjusted to remove large areas where the cumulative impacts of numerous vehicle routes and other intrusions have resulted in a loss of wilderness character.	YES (See “D” and “E” on Map 2-11 in Section II.)

LOST SPRING CANYON (Refer to Map 3-14)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Vehicle way SL2A is incorrectly cherry-stemmed. The cherry-stem should be removed.	This 3.3-mile way provides access to the northern end of Arches National Park above Cordova Canyon. While it does not meet all criteria of the BLM road definition used for wilderness inventory purposes, this route constitutes a substantially noticeable impact on wilderness character and was therefore cherry-stemmed.	NO
2	BLM incorrectly classified route SL2B as a road and uses it as the boundary.	This boundary route has been identified as a vehicle way because it is not maintained and does not meet all the criteria of the BLM road definition used for wilderness inventory purposes. This route forms the edge of disturbance that separates lands with wilderness character from those found not to have wilderness character.	NO
3	BLM incorrectly classified route SL1D as a road and cherry-stems it. The Road/Way form confirms the route is not a road, but is rather a non-significant impact. The cherry-stem should be removed.	The vehicle way leading to the Yellow Bird Mine was constructed and receives regular use. While it does not meet all criteria of the BLM road definition, this well-established route constitutes a substantially noticeable impact on wilderness character and was cherry-stemmed.	NO
4	There is a road spur across Sections 15 and 16. Another comment identified this route as crossing Fish Seep Draw to Winter Camp Ridge.	Upon further review, this very faint, 0.8-mile route identified as LS99-2, does not meet all the criteria of the BLM road definition used for wilderness inventory purposes and is considered to be a vehicle way. LS99-2 was not constructed, is not maintained, and does not receive regular and continuous use.	NO

LOST SPRING CANYON (Refer to Map 3-14)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
5	BLM incorrectly classified route SL2D as a road and cherry-stems it. The Road/Way form confirms the route is not a road. The cherry-stem should be removed.	SL2D was constructed and receives regular use; however, it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. It was cherry-stemmed because it constitutes a substantially noticeable impact on wilderness character.	NO
6	There are several looping roads in Sections 15 and 22.	Upon further review, several old seismic lines were identified in this location. Of these, two were identified as vehicle ways.	NO
7	Two comments state that there is a bladed route south of Mollies Hogan that was not identified by the BLM.	Upon further review, this route, identified as LS993 was found to be a vehicle way that was originally constructed and receives regular use, but does not meet all criteria of the BLM road definition used for wilderness inventory purposes. It constitutes a substantially noticeable intrusion and has been cherry-stemmed out of the inventory area.	YES (See "A" on Map 2-12 in Section II.)
8	BLM incorrectly classified route SL2E as a road and cherry-stems it. The cherry-stem should be removed.	Upon further review, this route was determined to be a little-used, un-maintained vehicle way that does not meet all criteria of the BLM road definition used for wilderness inventory purposes. The cherry-stem has been removed.	YES (See "C" on Map 2-12 in Section II.)
9	BLM incorrectly classified route VKS3E as a road and cherry-stems it. The cherry-stem should be removed.	This 1.3-mile route was determined to be a road because it meets all criteria of the BLM road definition used for wilderness inventory purposes. Therefore, it is cherry-stemmed.	NO
10	BLM incorrectly classified route VKS3C as a road and cherry-stems it. The cherry-stem should be removed.	The Winter Camp Ridge route was determined to be a road because it meets all criteria of the BLM road definition used for wilderness inventory purposes. It is cherry-stemmed.	NO
11	BLM incorrectly classified route VKS2B as a road and cherry-stemmed it. The cherry-stem should be removed.	VKS2B is a constructed, well-defined 2.2-mile road to Lipiquino Water. It was found to be a road because it meets all criteria of the BLM road definition used for wilderness inventory purposes. It is cherry-stemmed.	NO
12	BLM incorrectly classified route VKS3B as a road and cherry-stemmed it. The road/way form confirms the route is not a road. The cherry-stem should be removed.	This route, which is a segment of road VKS2B, is determined to be a road to the point where it meets Lipiquino Creek, because it meets all criteria of the BLM road definition used for wilderness inventory purposes. This segment has been cherry-stemmed.	NO
13	There is a short spur east of Jug Rock that was not identified by the BLM.	Upon further review, this un-maintained route was identified as LS99-1 and determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
14	BLM incorrectly classified route VKS1A as a road and uses it as a boundary. The Road/Way form confirms the route is not a road. Correct the classification and do not use this route as a boundary.	This route is within an area that has been severed by the exclusion of State land and is not part of the area with wilderness character.	NO

LOST SPRING CANYON (Refer to Map 3-14)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
15	BLM's boundary follows section lines and excludes a roadless area with only a few significant impacts. The boundary should be expanded.	This area is beyond the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
16	BLM used section lines as the boundary. The boundary should be expanded to the Colorado River.	This area is beyond the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
17	Three comments were received stating that Dry Mesa and Dome Plateau should be included in the inventory area.	This area is beyond the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO

MARY JANE CANYON (Refer to Map 3-15)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	There is a short spur route off the Onion Creek Road that was missed by the BLM.	Upon further review, this 0.6-mile route, identified as MJ-99-1, was determined to be a way because it was not constructed or maintained.	NO
2	The BLM should keep this route off the Onion Creek Road open.	Upon further field review, this 0.15-mile stub, identified as MJ-99-2, was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. This inventory will not affect vehicle access on existing routes.	NO
3	There is a route into Ida Gulch accessing a state section that is important for the filming industry.	Upon field review, this route identified as PS1A, and was found to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. The initial 0.1-mile segment of this way is a well-established, regularly used route that constitutes an impact on wilderness character and was cherry-stemmed. The character of the remaining 2-mile segment is not significant and is not cherry-stemmed. This state section is now privately owned.	NO
4	The BLM boundary near Parriott Mesa is incorrect.	This location is the edge of disturbance and was determined to be the most appropriate boundary in this instance.	NO
5	The area west of Parriott Mesa should be included in the area with wilderness character.	This area west of the mesa was excluded because of multiple vehicle routes and/or disturbances related to heavy OHV use.	NO
6	BLM did no fieldwork on this route and did not complete a Road/Way form. This route is not a significant impact and should not be cherry-stemmed.	Upon field review, the route, identified as MJ-00-1, has been determined to be a road because it meets all criteria of the BLM road definition used for wilderness inventory purposes. Both the road and a large earthen dam (with mining debris) at its end have been cherry-stemmed.	YES (See "D" on Map 2-13 in Section II.)

MARY JANE CANYON (Refer to Map 3-15)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
7	BLM uses arbitrary section lines as the boundary and excludes a roadless area with few impacts. The boundary should be relocated to include a roadless area.	This area is outside the boundary of the previous H.R.1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> . The area to the east is separated from the rest of the inventory area by State land.	NO
8	There is a route toward Castle Rock on Adobe Mesa that was missed by the BLM.	This little-used 0.6-mile route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
9	BLM incorrectly classified routes LS1A and LS1F as roads and cherry-stemmed them. The cherry-stems should be removed. Two other comments stated that the cherry-stem on route LS1A on Adobe Mesa should be removed.	Route LS1F is a seismic line that parallels a portion of route LS1A, which was identified as a vehicle way. Both routes create a substantially noticeable impact on natural character and were cherry-stemmed.	NO
10	Exclude the spur routes off the Adobe Mesa cherry-stem.	A vehicle way to a stock pond off of the Adobe Mesa route, identified as LS1B, was cherry-stemmed due to its impact on natural character. The four vehicle ways that stem off of this route, identified as MJ-2000-A, LS1C, LS1D, and LS1E, were not cherry-stemmed because they do not constitute substantially noticeable impacts. These routes were determined to be vehicle ways because they do not meet all criteria of the BLM road definition for wilderness inventory purposes.	YES (See "C" on Map 2-13 in Section II.)
11	BLM uses arbitrary section lines as the boundary and excludes a roadless area with no significant impacts. The boundary should be moved to include roadless area.	The boundary in this area is set along State and private lands. The lands beyond are outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
12	BLM's boundary follows a wash bottom, which excludes a roadless area free of impacts to the power line to the south. The boundary should be adjusted to include the excluded area.	The boundary in this area is set on Castle Creek, which is a readily identifiable boundary separating the area with wilderness character from that lacking wilderness character because of the Rock Castle campground and the power line right-of-way. This was determined to be the most appropriate boundary in this instance.	NO
13	The BLM should inventory areas in the Upper Castle Valley and two areas on the southwest side of the area.	These areas are outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO

MILL CREEK CANYON (Refer to Map 3-16)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Some small portions of the Steelbender 4WD Trail in Sections 12 and 18 are within the inventory area. Another comment stated that the BLM should exclude the Steelbender 4WD Trail from the inventory area.	The Steelbender 4WD Trail forms the boundary of the area with wilderness character, and the 4WD trail is not in the inventory area.	NO
2	BLM incorrectly classified route BS2D as a road and uses it as the boundary. The Road/Way form confirms the route is not a road but an insignificant impact.	This 0.5-mile vehicle way is a substantially noticeable intrusion that marks the edge of disturbance between the lands with wilderness character and those found lacking wilderness character.	NO
3	The BLM should keep the road to the South Mesa viewpoint open.	This 1-mile vehicle way is an extension off the South Mesa ranch route. It does not receive regular or continuous use and was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. This inventory will not affect vehicle access on existing routes.	NO
4	BLM's wilderness character boundary excludes natural areas. The inventory area boundary should be expanded.	Upon further field review, additional lands located between Mill Creek and South Mesa (~510 acres) was found to have wilderness character. The area with wilderness character has been expanded to the south.	YES (See "A" on Map 2-14 in Section II.)
5	BLM uses arbitrary section lines as the boundary and excludes a roadless area with no significant impacts. The boundary should be moved to include the roadless area.	This area is outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
6	The South Mesa Trail is used for cattle trailing.	This "horse" trail has been documented on the inventory maps.	NO
7	The Fins 'n Things 4WD trail appears to enter the inventory area in Section 2.	Section 2 is a state section and is beyond the scope of this inventory.	NO
8	The 4WD route on the northern end of the area should be reopened.	This route is within an existing WSA and is not subject to the inventory.	NO
9	Wilson Mesa and South Mesa should have been inventoried and included in the area with wilderness character.	The majority of Wilson Mesa is private property. Both Wilson Mesa and South Mesa are mostly outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> . The isolated parcels are not contiguous to an existing WSA or an area administratively endorsed for wilderness in the adjoining national forest. They do not meet the BLM size criteria required for an area to be determined to have wilderness characteristics.	NO

NEGRO BILL CANYON (Refer to Map 3-17)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Mat Martin Point should be included in the area with wilderness character.	Mat Martin Point has a network of old bladed routes that fan out to major points above the river. Cumulatively, these routes substantially impact naturalness, and the area was found lacking wilderness character.	NO
2	This seismic line is not a significant impact and should not be used as a boundary. Seismic lines and areas free of any significant impacts should be included in the wilderness character portion of the inventory area.	This area near Coffee Pot Rock has several seismic lines crisscrossing in the immediate vicinity. Cumulatively, these seismic lines, in conjunction with vehicle way LS3A, constitute a substantial impact on natural character. As a result, the area was determined to lack wilderness character.	NO
3	BLM's boundary follows arbitrary section lines so non-impacted areas are excluded. The wilderness character boundary should be expanded to include this area.	The boundary of the wilderness character area follows the Porcupine Rim 4WD Trail. This road separates lands with wilderness character from those lacking wilderness character due to impacts from seismic lines, vehicle ways, and other man-made intrusions.	NO
4	The route in Section 26 extends west to the existing Negro Bill WSA boundary and enters the WSA for 0.5 miles.	This linear path is identified as a seismic line on the inventory map. It is not considered a vehicle travel route.	NO
5	There is a spur route in Sections 27 and 34 that was not identified by BLM.	Upon further field review, this route, identified as 2000-A, was determined to be a vehicle way because it was not constructed or maintained.	NO
6	The route along the canyon bench, beginning in Section 35 should be cherry-stemmed.	This is a boundary road between the existing WSA and the inventory area and is cherry-stemmed.	NO
7	There is a spur route in Section 33 that was not identified by BLM.	This 0.4-mile route was identified as SL1E and determined to be a vehicle way because it was not constructed or maintained.	NO
8	The BLM should keep the Slickrock Bike Trail open.	This trail is not located within the area found to have wilderness character so it will not be affected by this inventory.	NO

SHAFER CANYON (Refer to Map 3-18)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM incorrectly uses an old mining route for a boundary. The boundary should be expanded to a significant impact.	This vehicle way separates the lands with wilderness character from those lacking wilderness character due to multiple intrusions, primarily associated with past mining activities. This route provides the most appropriate boundary configuration at this location.	NO

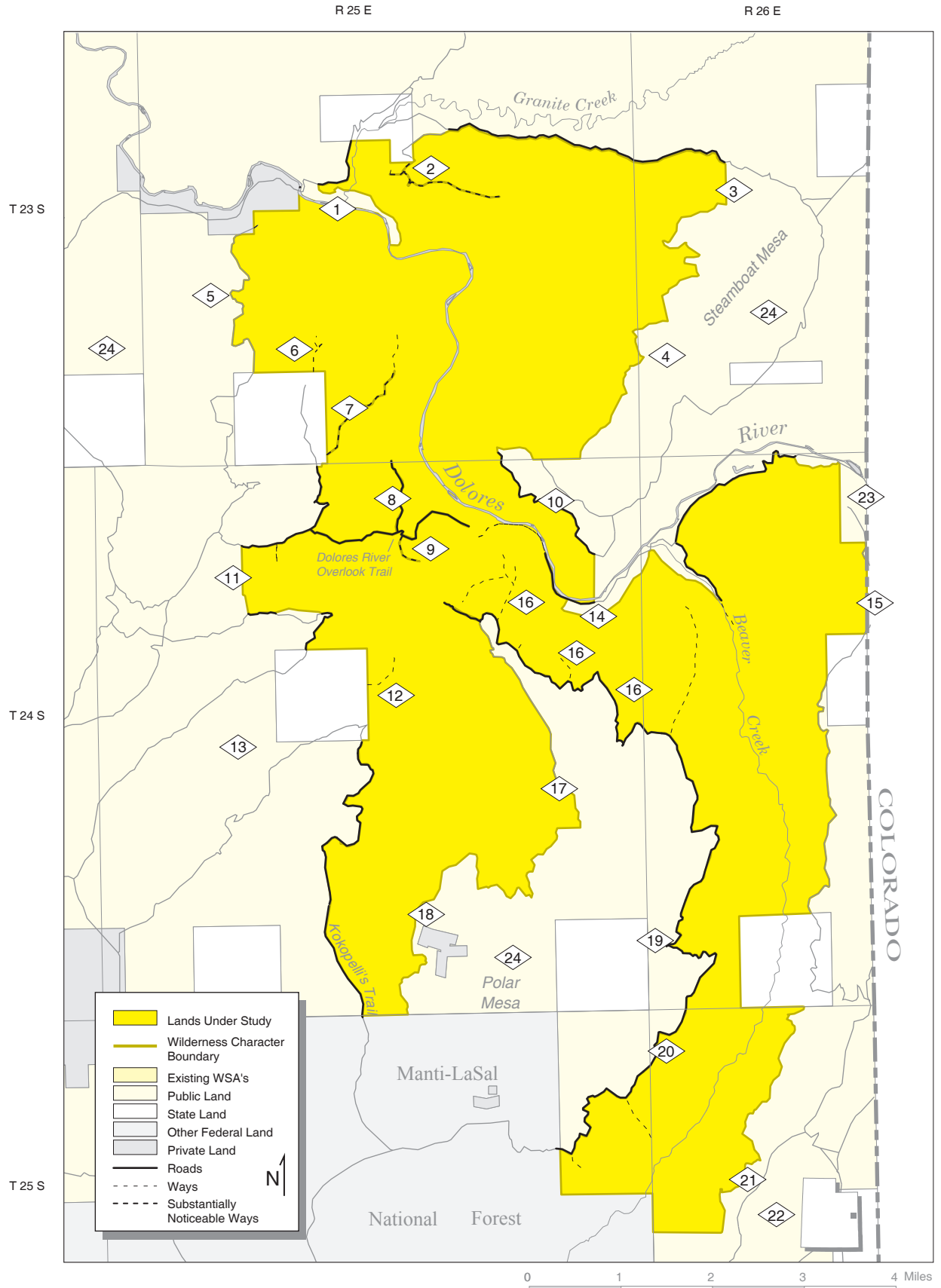
SHAFER CANYON (Refer to Map 3-18)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
2	Route VKS2B should be determined to be a road.	This 0.3-mile spur route does not receive regular or continuous use, is not maintained, and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. This vehicle way forms a segment of the boundary.	NO
3	BLM's boundary follows arbitrary section lines so non-impacted areas are excluded. The route to the area of old mining activity should be cherry-stemmed and the boundary can then be expanded. Another comment stated this area should be included in the area of wilderness character.	This area contains significant impacts, which include four drill holes (two with large un-reclaimed pads), a large heavily disturbed uranium mining area, six stock ponds, and several constructed routes. Cumulatively, these intrusions impact the natural character of this area, and the original boundary is the most appropriate in this instance.	NO

SPRUCE CANYON (Refer to Map 3-19)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
1	Two comments stated that BLM should combine the Flume Canyon, Coal Canyon and Spruce Canyon WSAs, since there is no physical barrier separating them.	Changing the boundaries of these existing WSAs is beyond the scope of the <i>1999 Utah Wilderness Inventory</i> .	NO

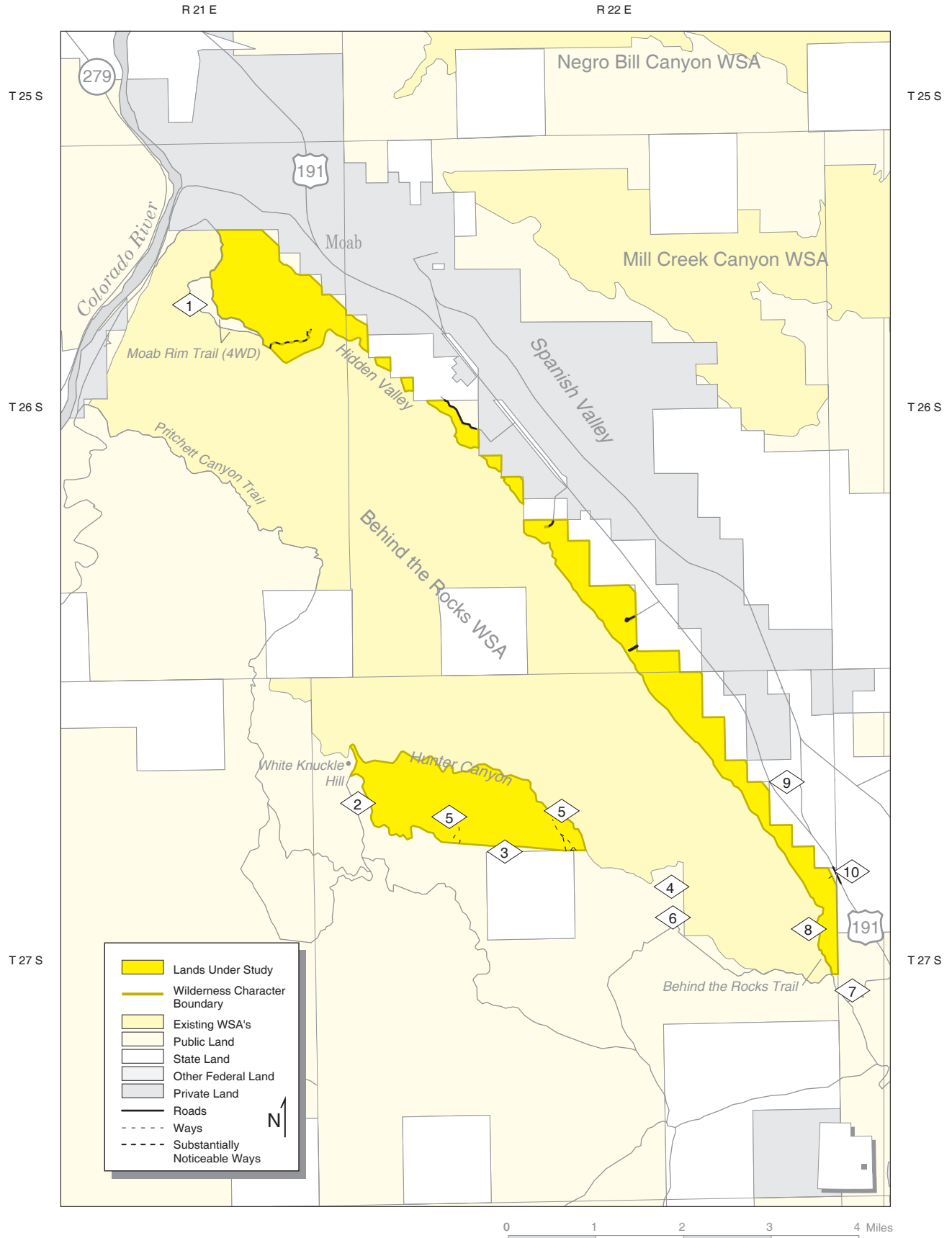
WESTWATER CANYON (Refer to Map 3-20)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM uses an insignificant route as the boundary. The boundary should be expanded to the west. Another comment stated the inventory area should be expanded to include lands to the northwest.	These lands are beyond the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
2	BLM's boundary follows arbitrary section lines so non-impacted areas are excluded. The boundary should be expanded to include non-impacted State lands.	This boundary is set along State lands and the Utah/Colorado State Line. Lands in Colorado. State lands are not subject to this inventory.	NO

WESTWATER CREEK (Refer to Map 3-21)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	The BLM incorrectly excluded the unit claiming the area lacks opportunities for solitude and primitive recreation. The BLM bases this conclusion on the presence of an active gas well and a natural gas pipeline on the southern boundary of the unit.	Upon inventory file and field review, this area was determined to have wilderness character. The gas well has been plugged since 1967. The right-of-way for the well is active and has been cherry-stemmed from the unit. The pipeline on the southern boundary is an active right-of-way and forms the boundary of the inventory area	YES (See "A" on Map 2-17 in Section II.)
2	The BLM incorrectly cherry-stemmed this route. The well is plugged, abandoned, and reclaimed. The route is difficult to access and receives little use.	The route in question leads to a plugged and abandoned gas well, and is almost completely reclaimed. However, an existing valid right-of-way (UO38103) applies to this route and therefore forms a boundary of the inventory area.	NO
3	The BLM incorrectly cherry-stemmed this route. The route to the point in not maintained, receives little to no use, and is not a significant impact.	This route is entirely in a State land section and is not included within the area with wilderness characteristics.	NO

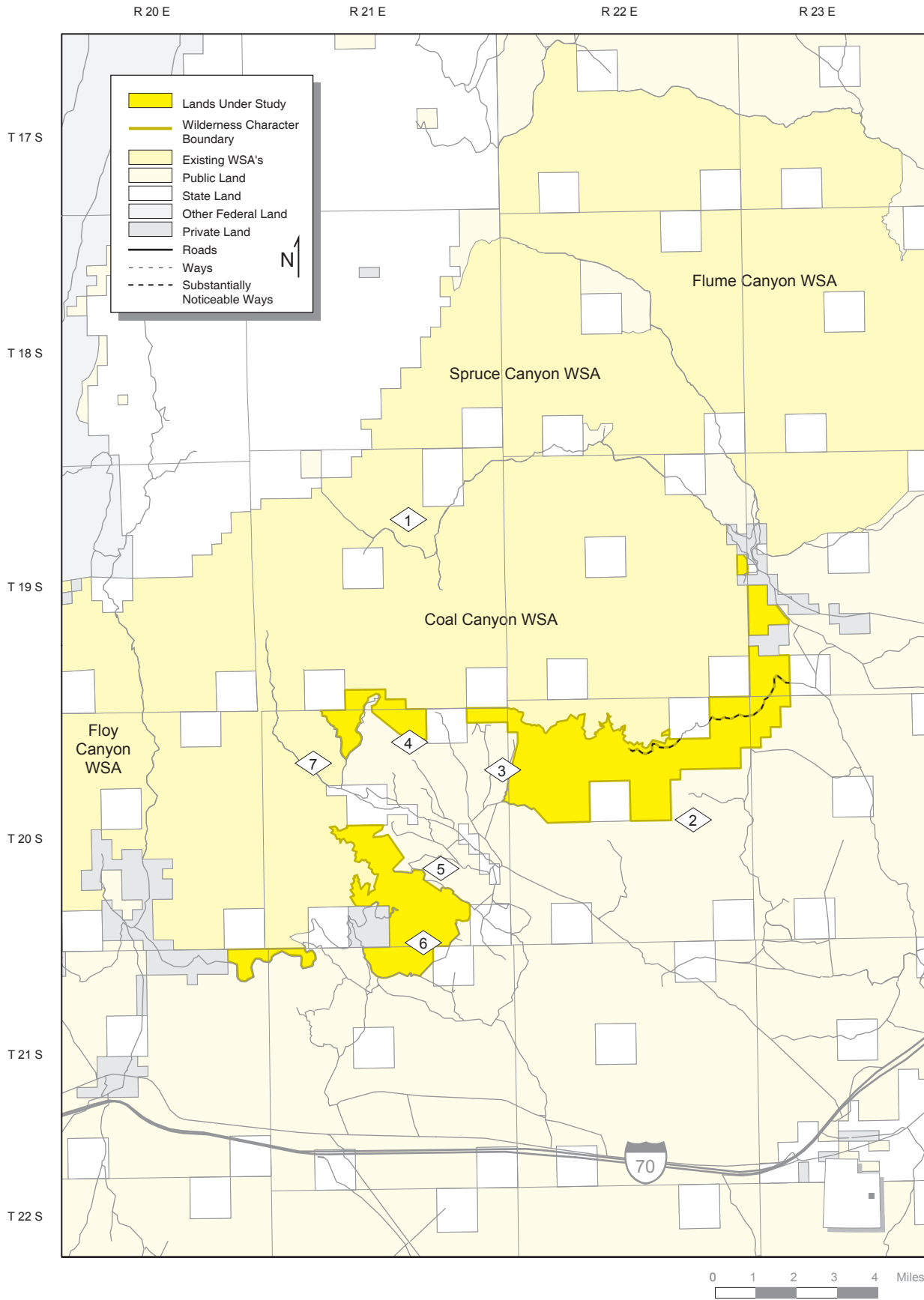
No public comments were received in those portions of the Harts Point inventory area that is under the administration of the Moab Field Office.

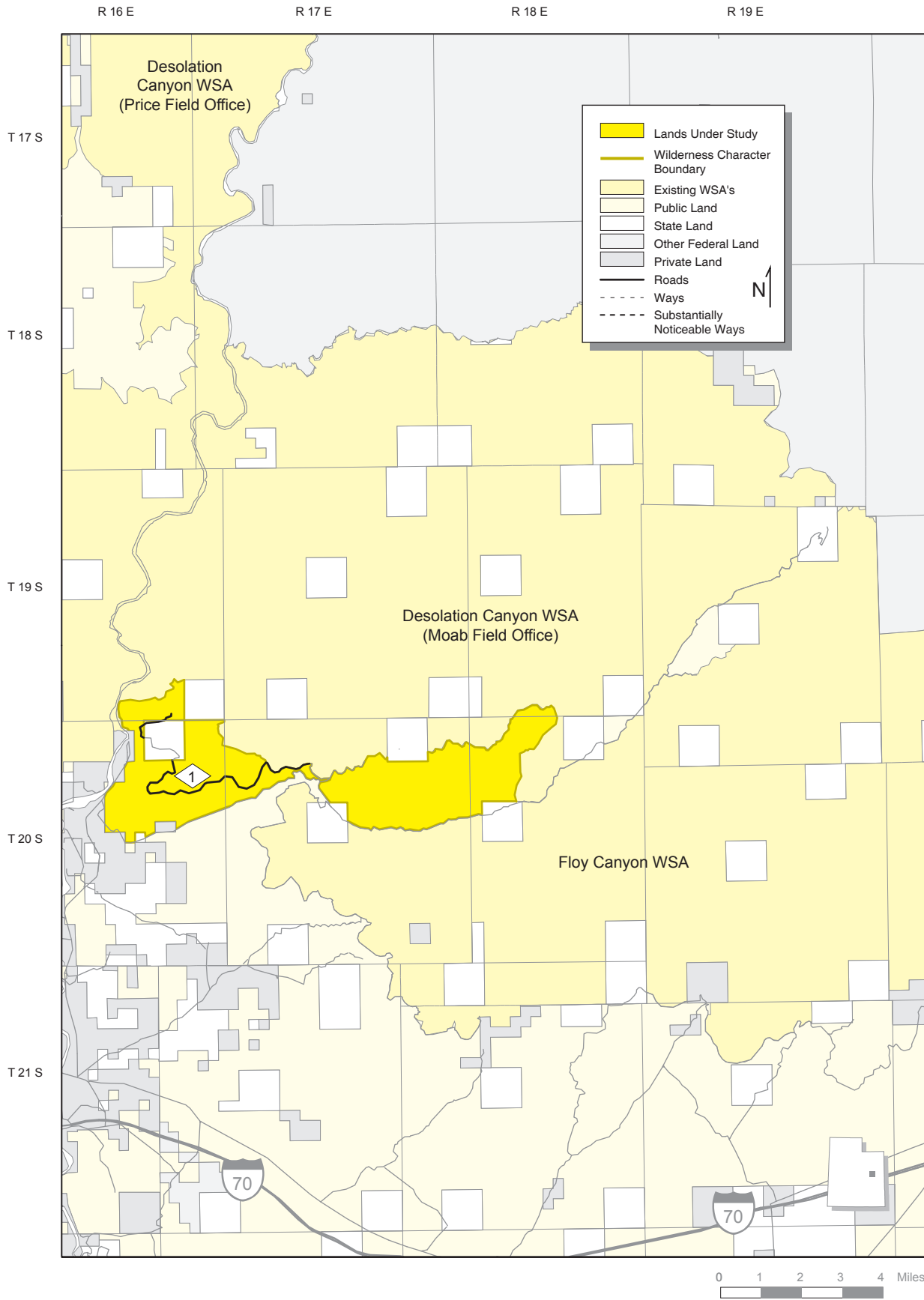


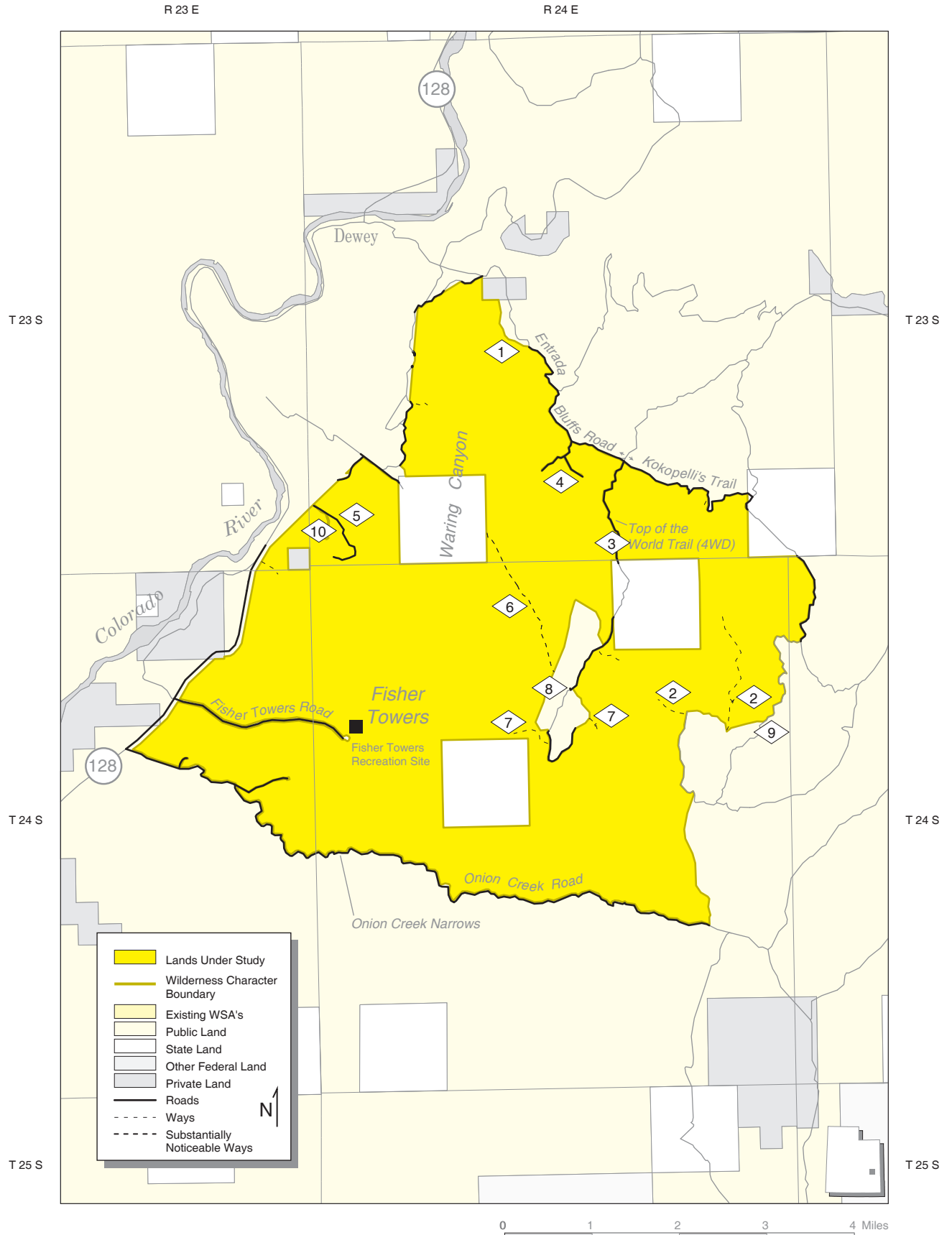
MAP 3.1



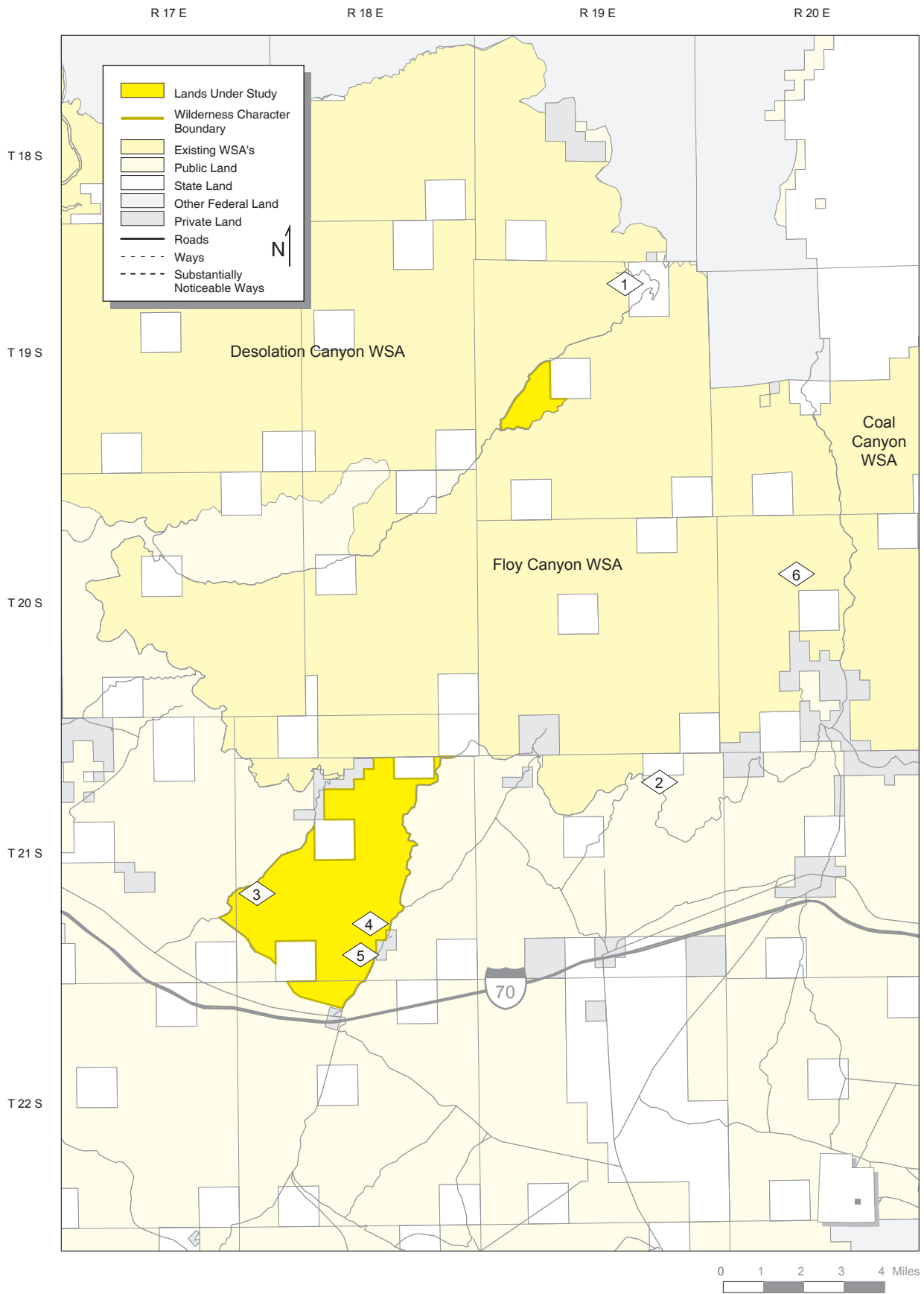
MAP 3.2

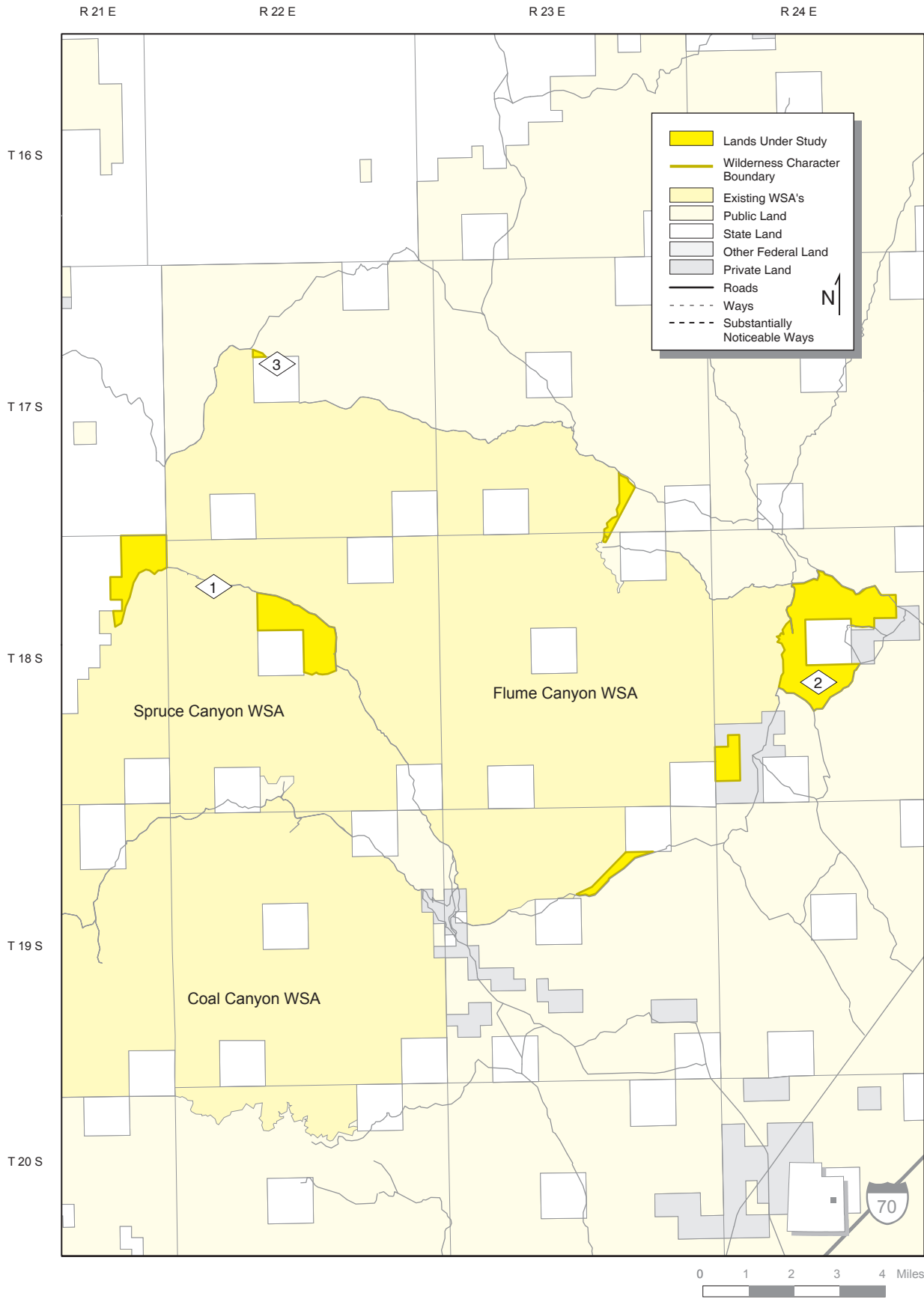


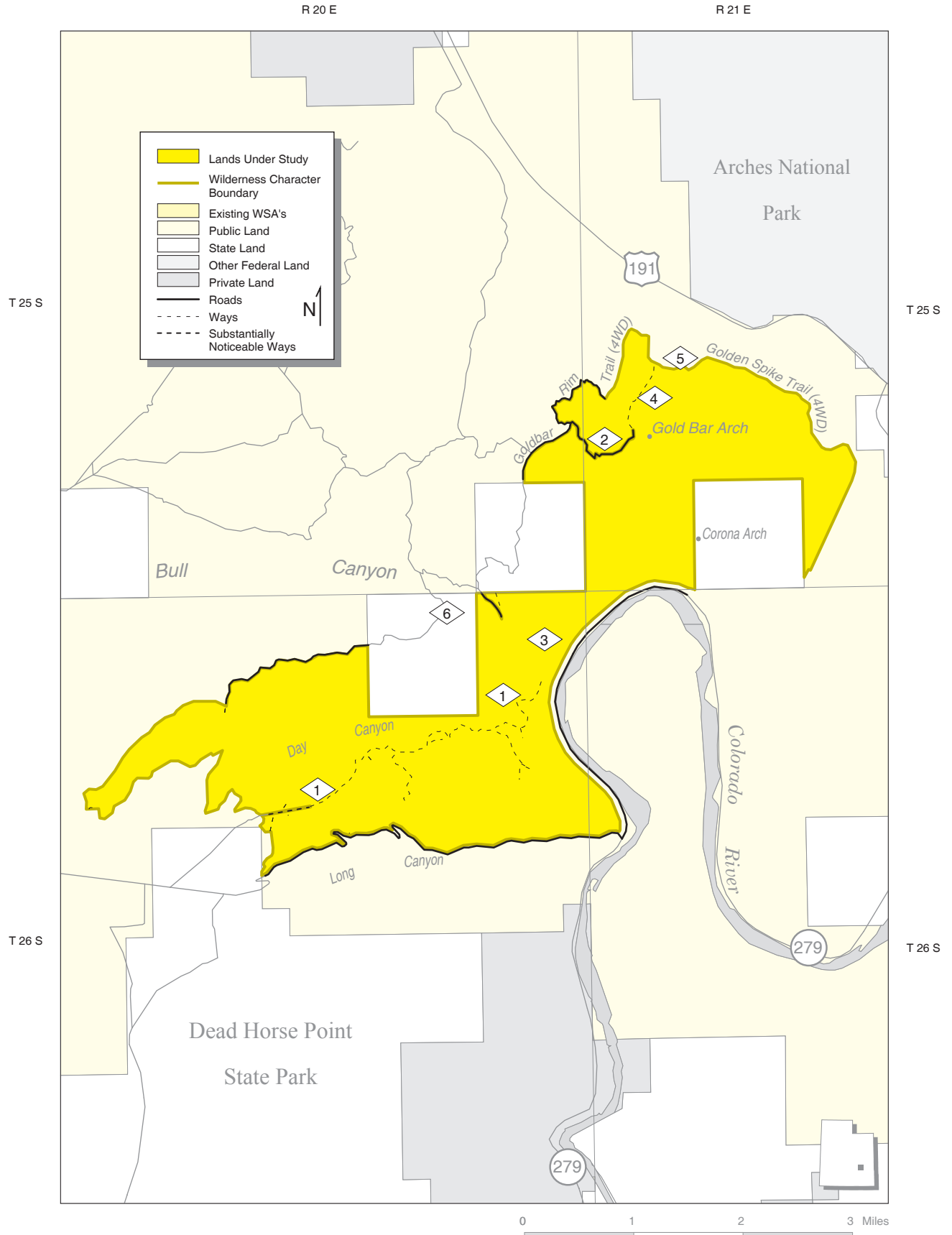




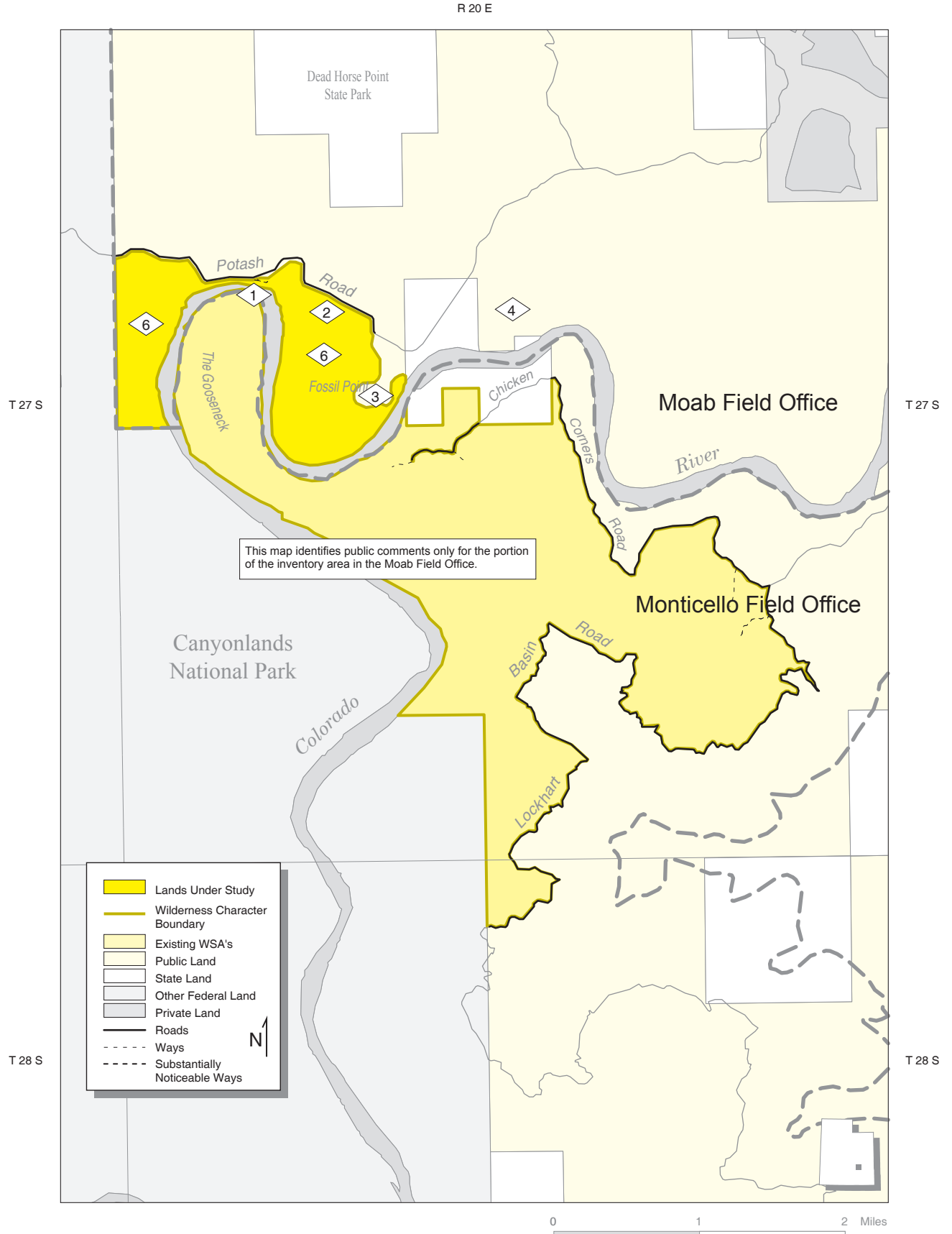
MAP 3.5



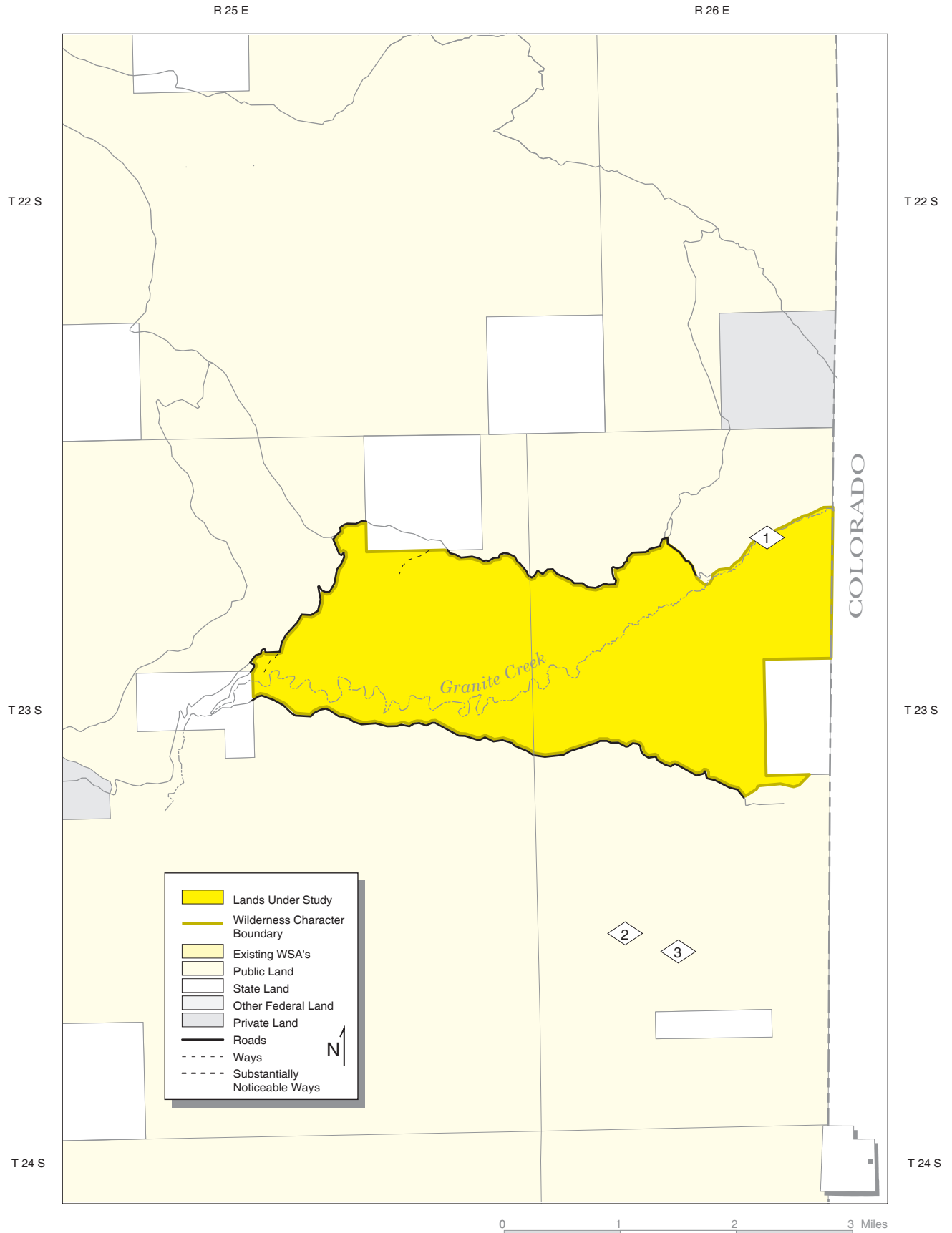




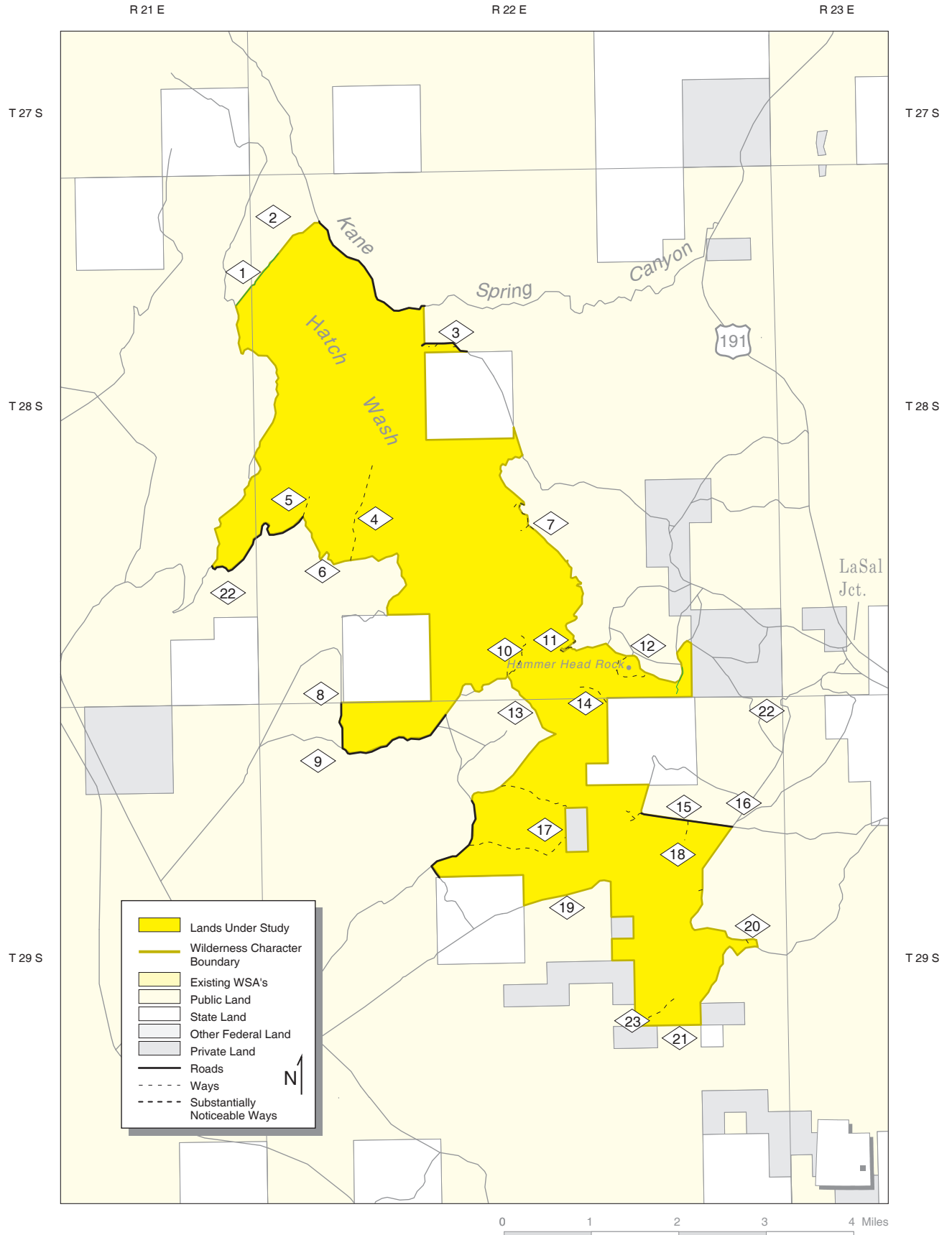
MAP 3.8



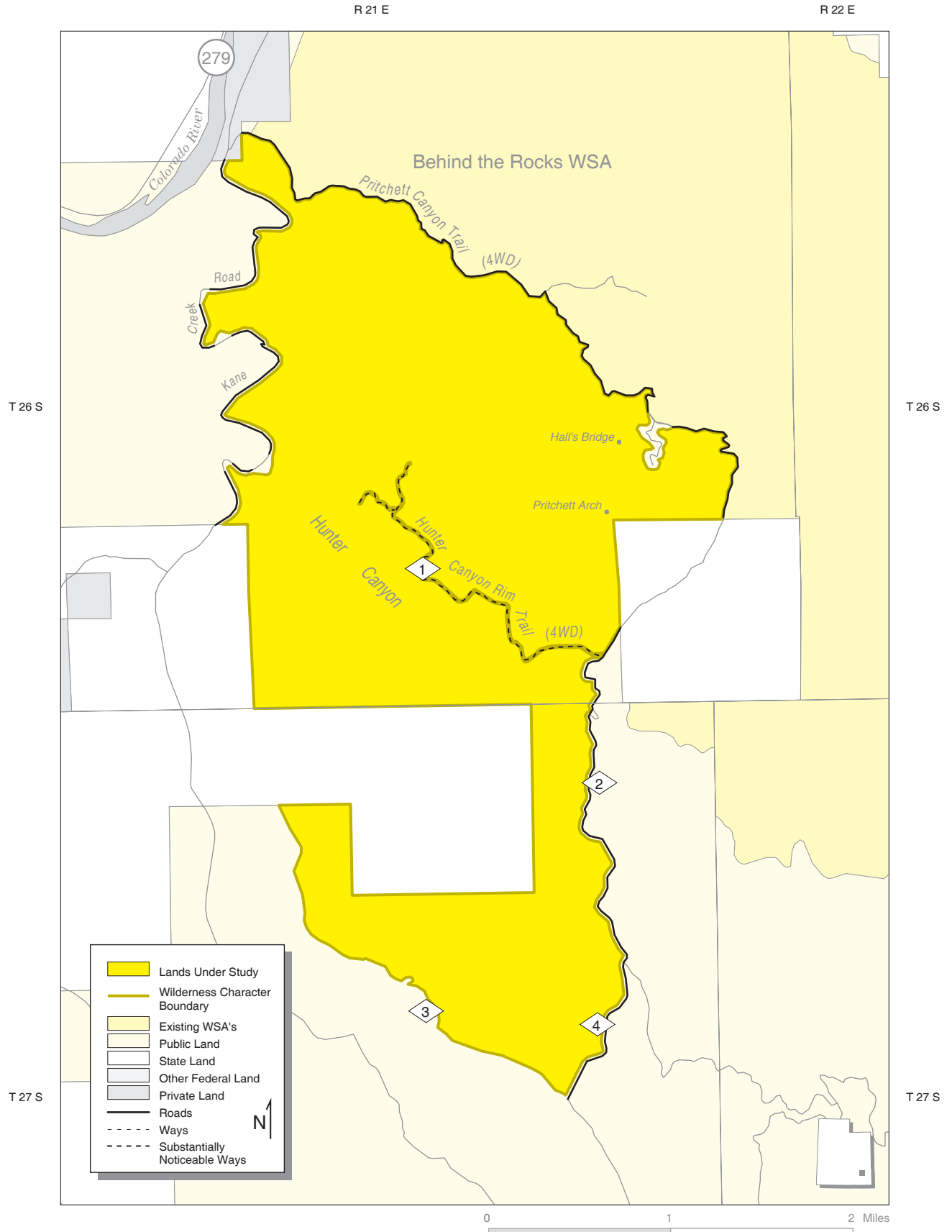
MAP 3.9



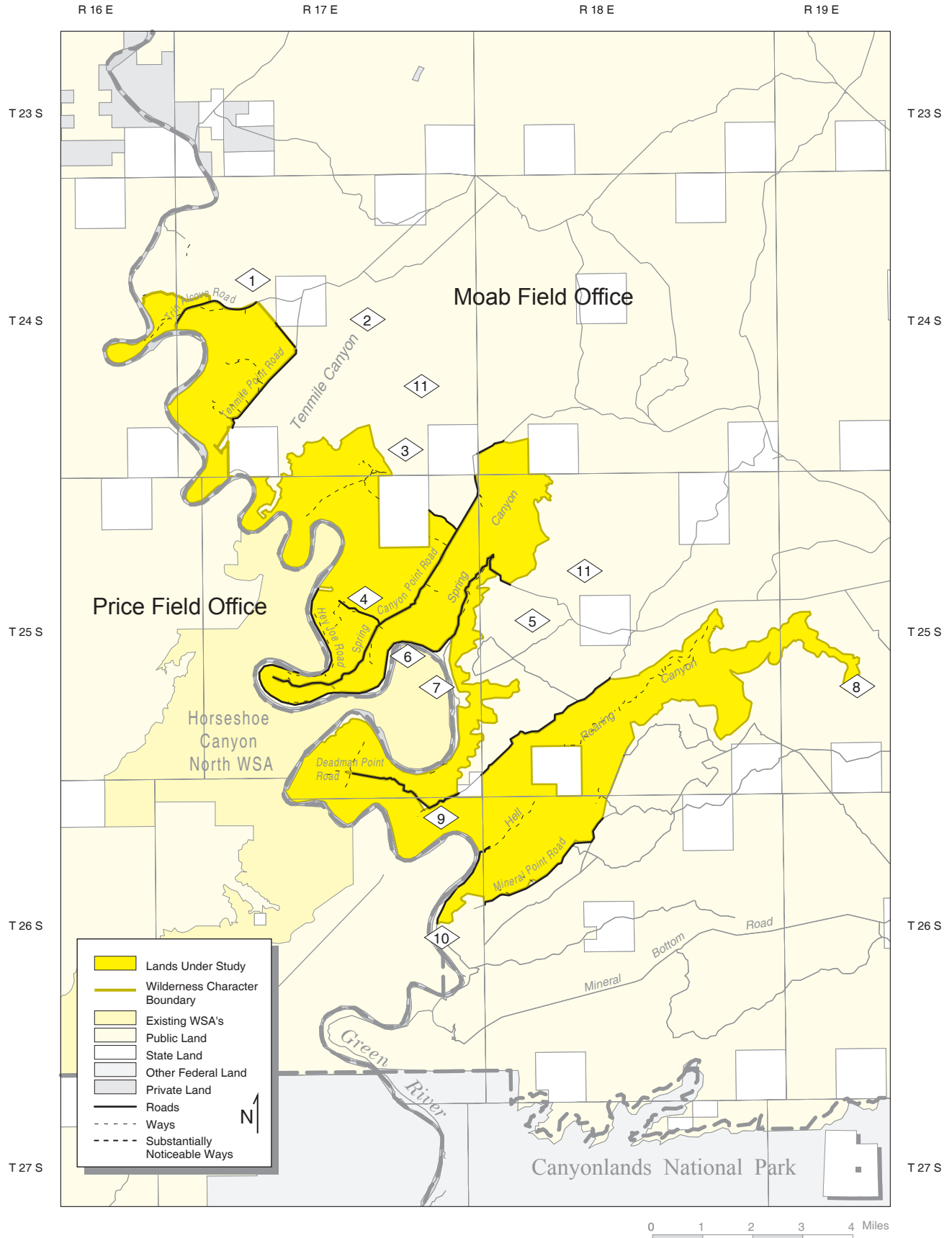
MAP 3.10



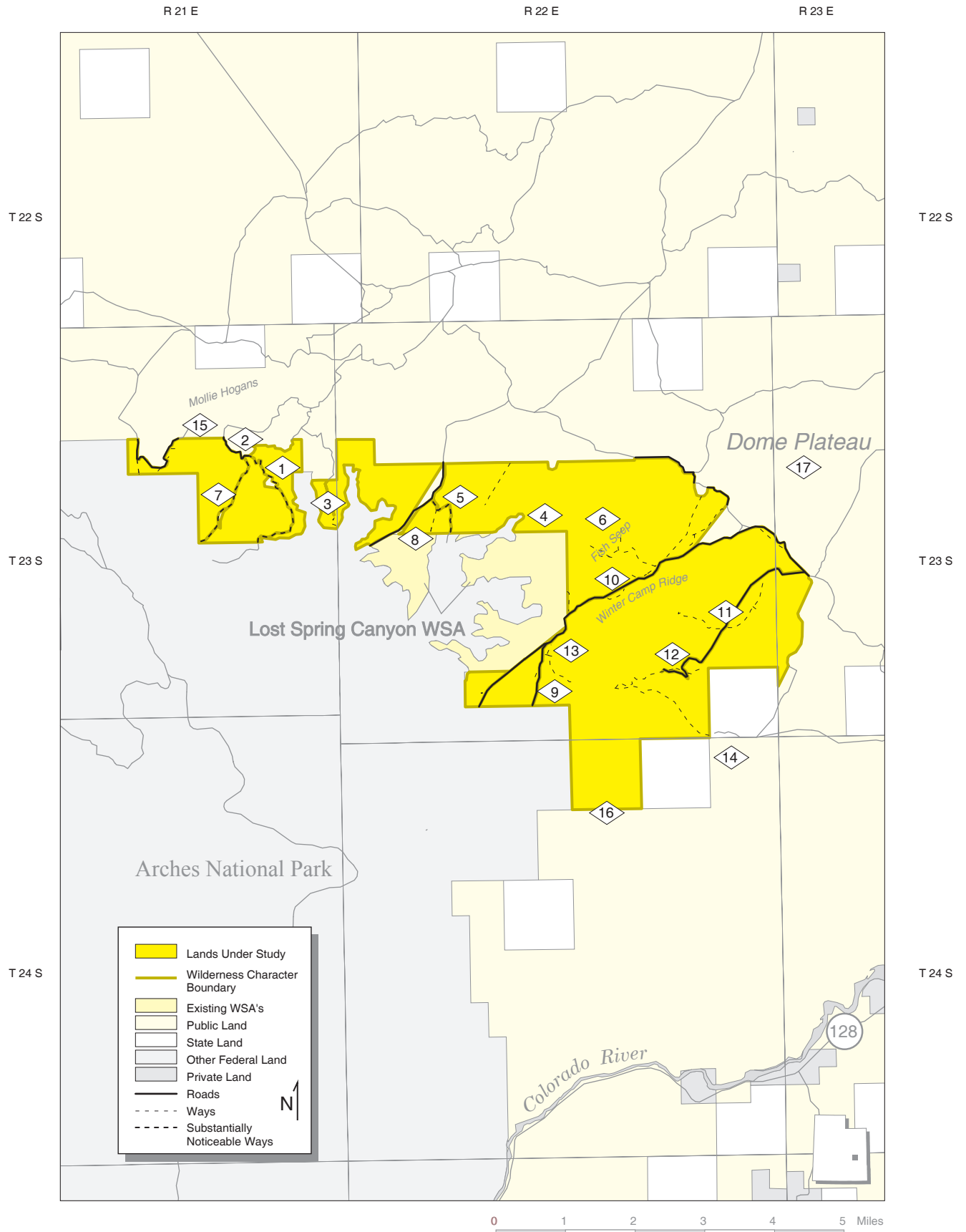
MAP 3.11



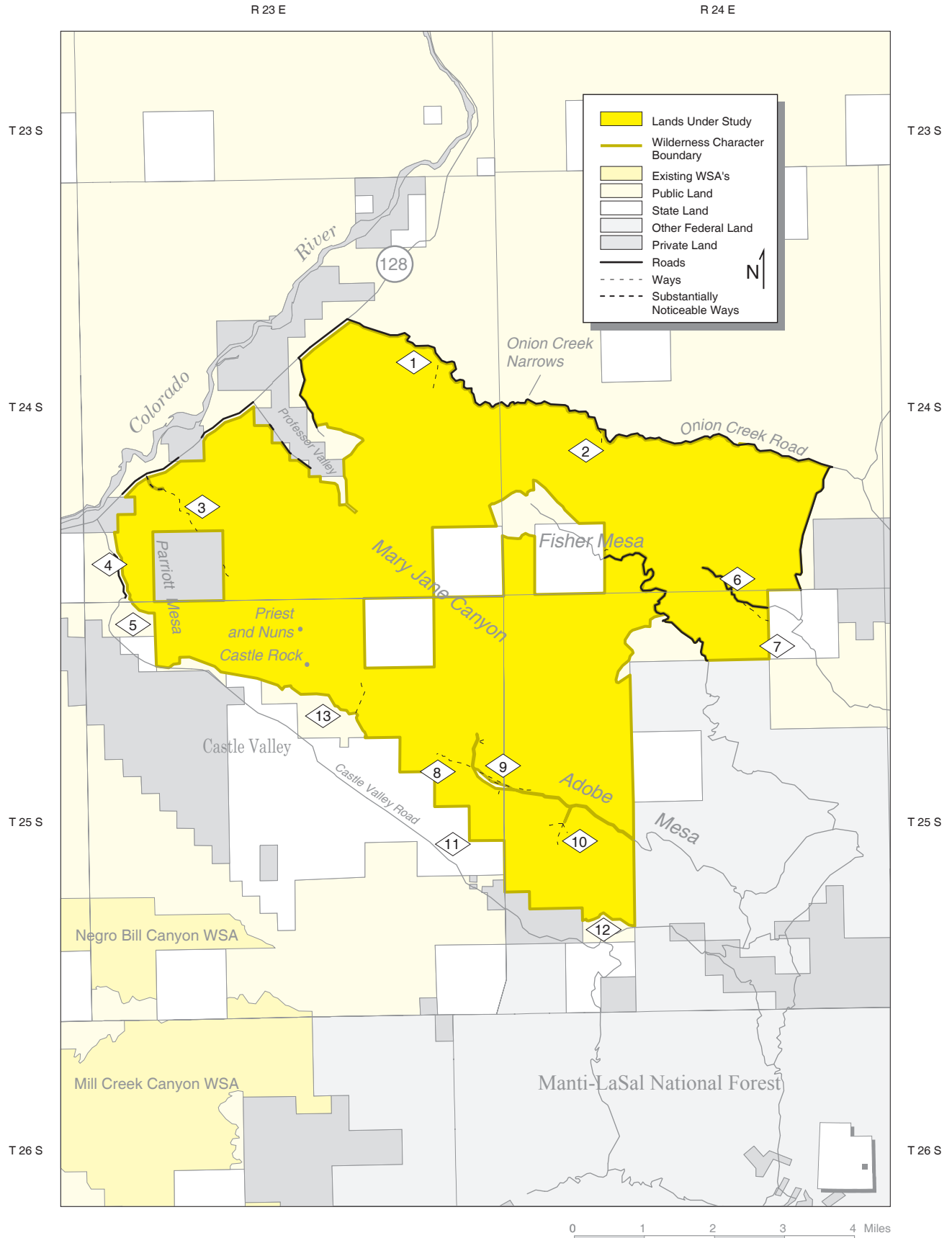
MAP 3.12



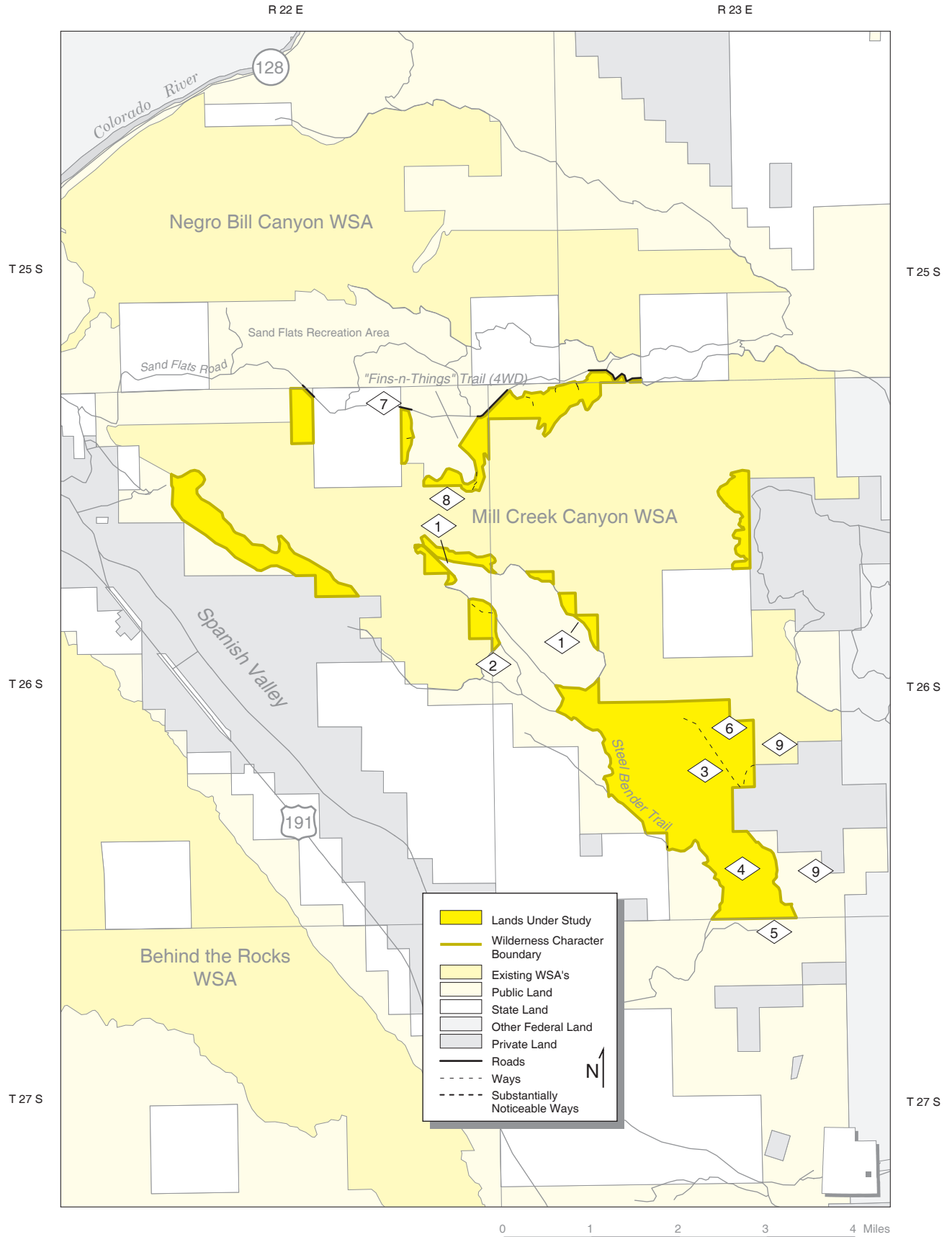
MAP 3.13



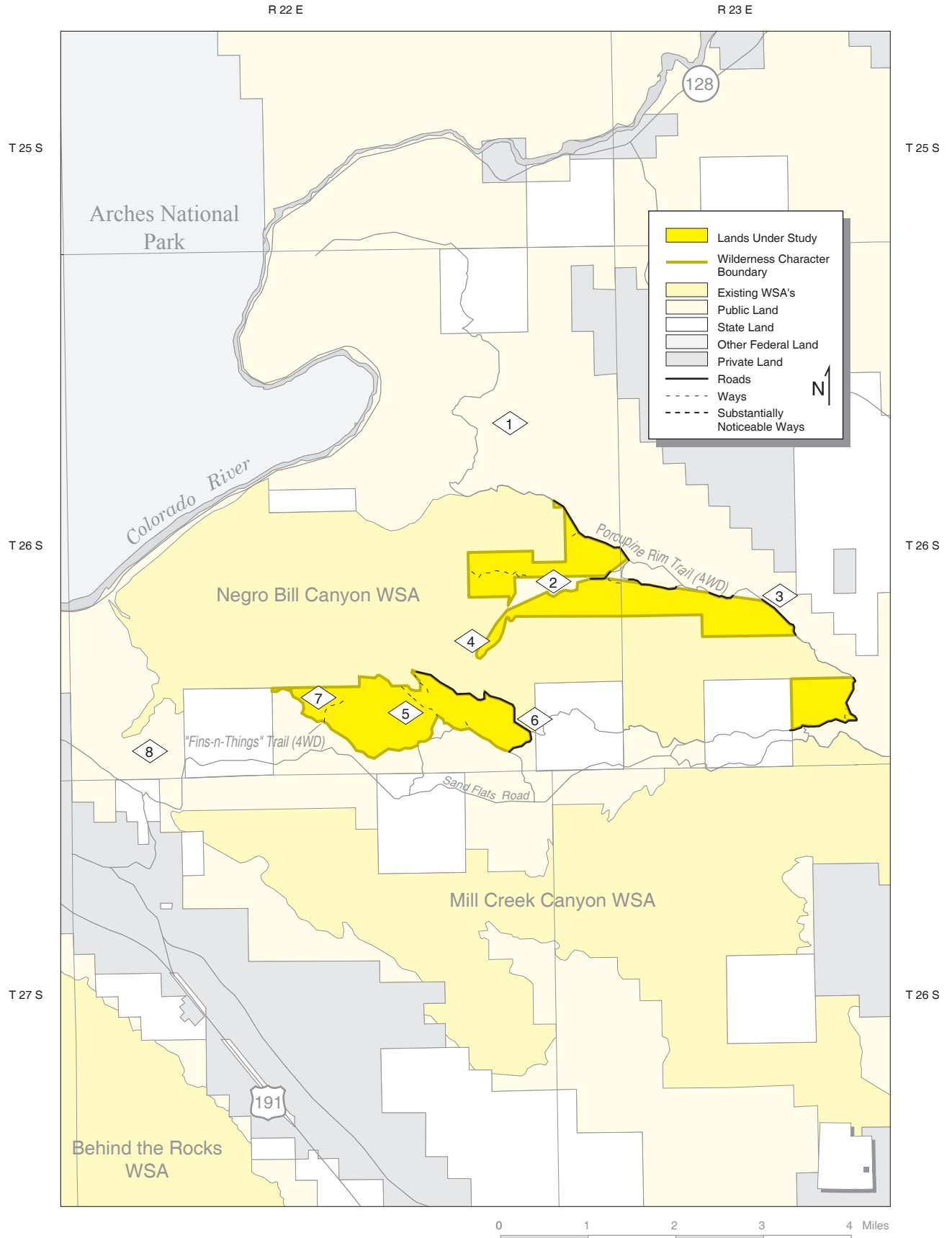
MAP 3.14



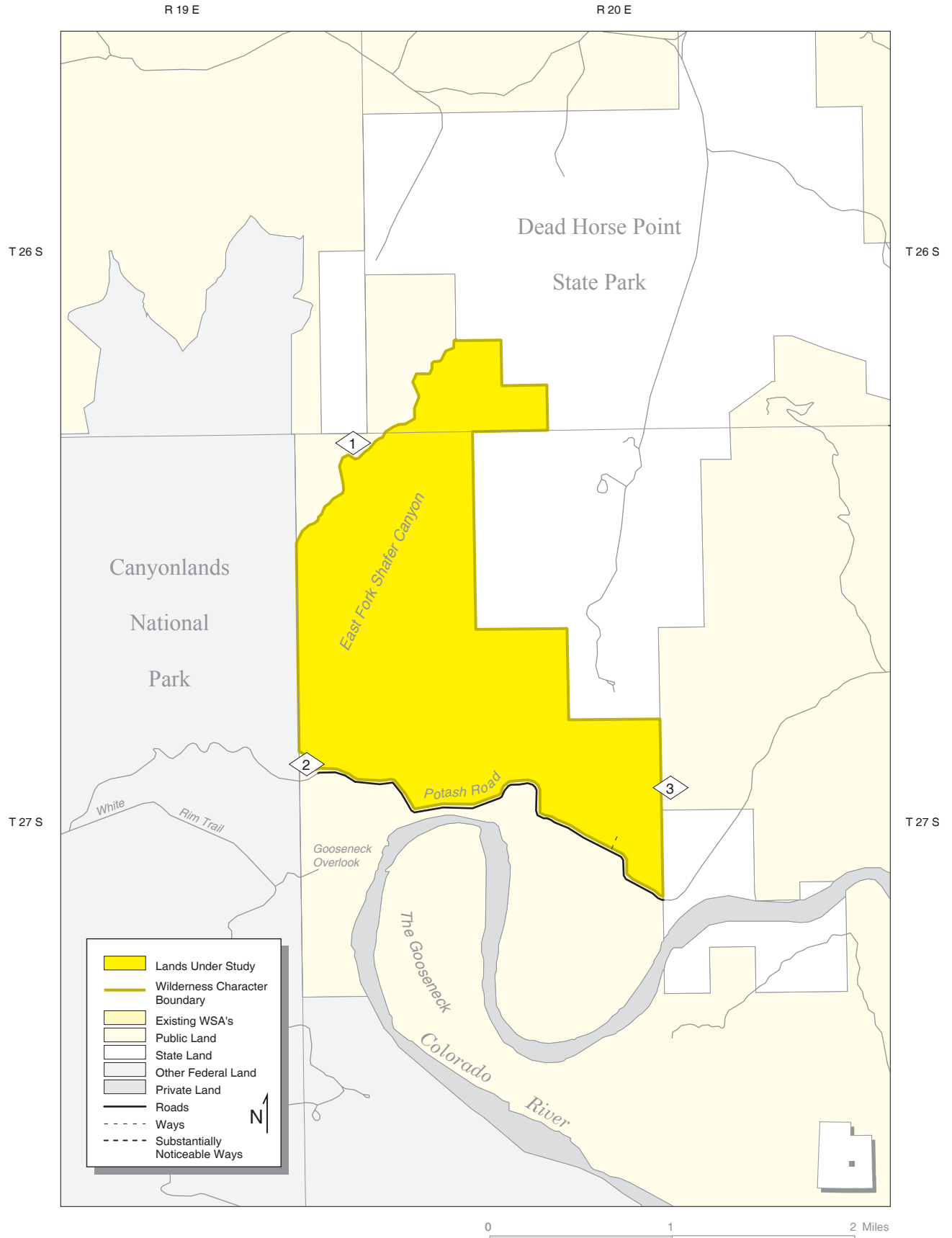
MAP 3.15



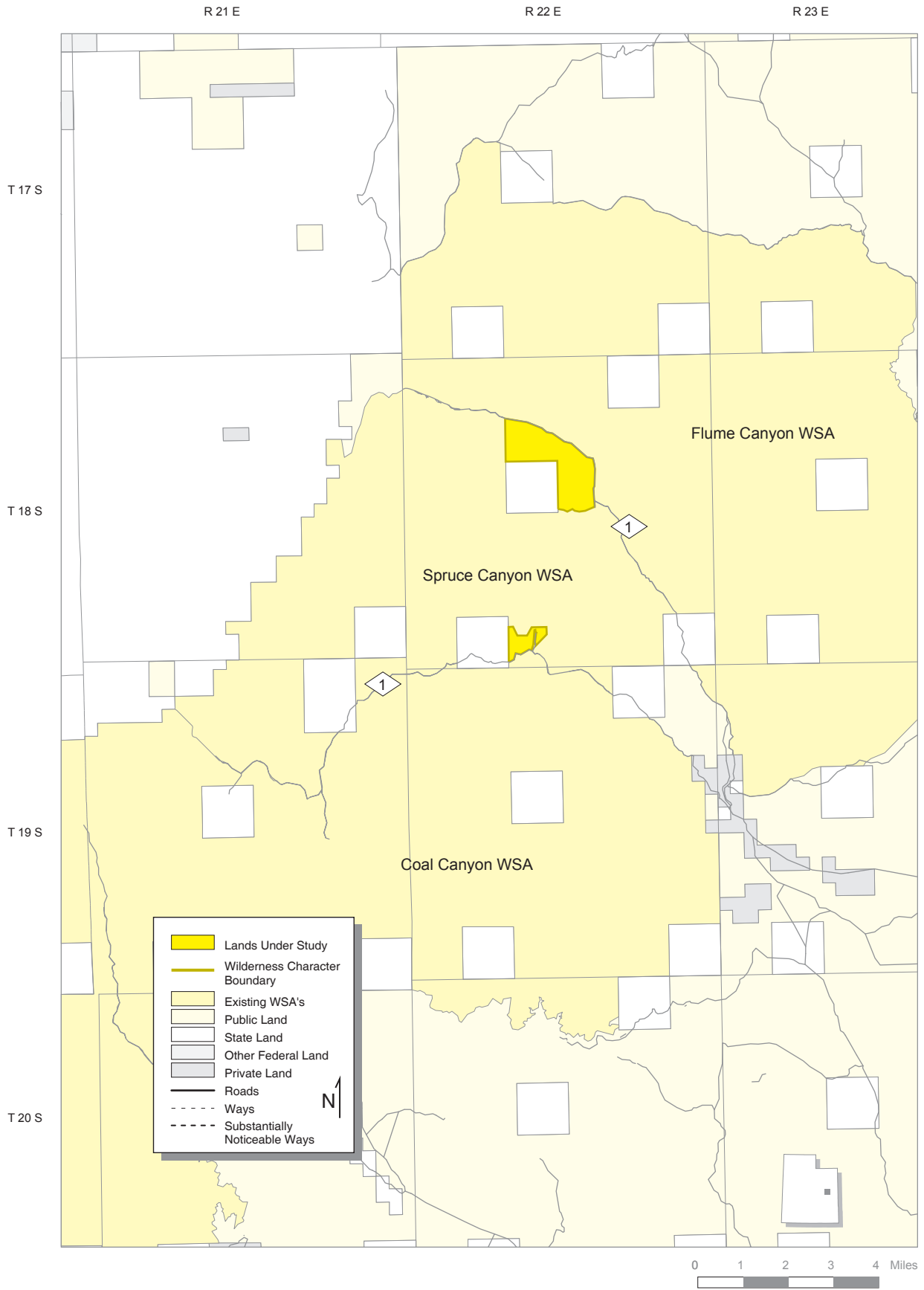
MAP 3.16

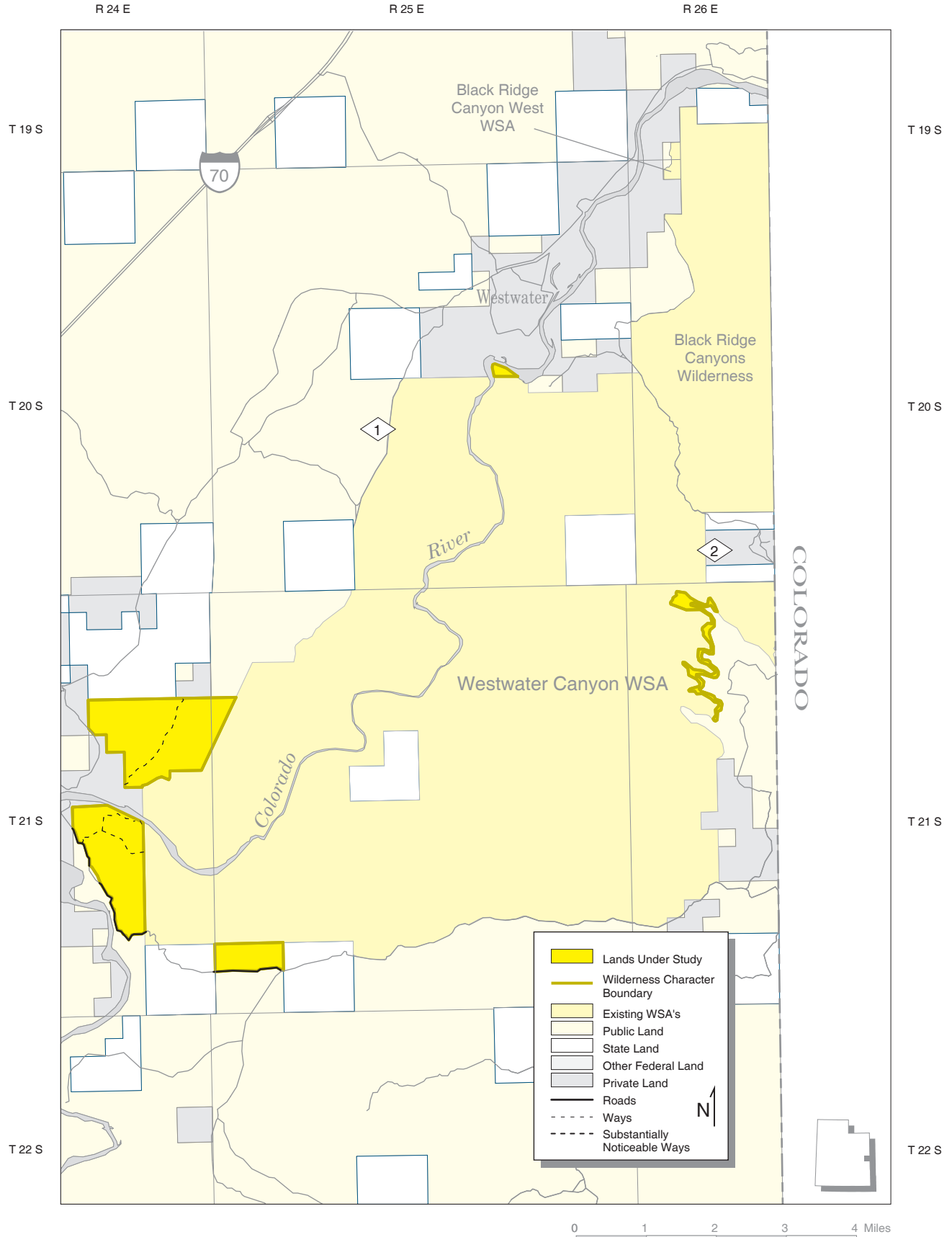


MAP 3.17

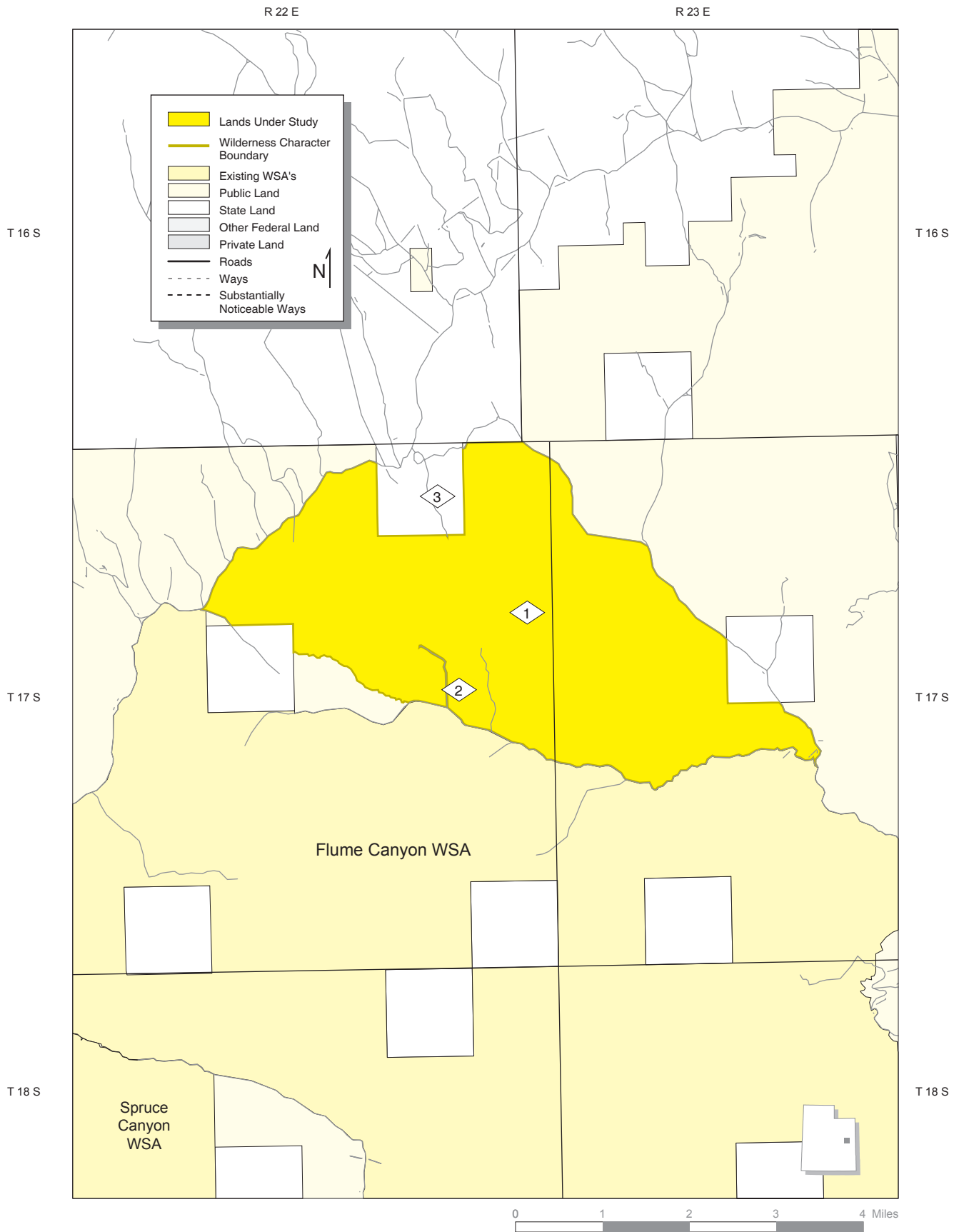


MAP 3.18





MAP 3.20



Glossary of Terms

Terms used in this document are defined as follows:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Wilderness inventory area: a portion of public land that has been inventoried and determined to have wilderness characteristics as defined in Section 2(c) of the *Wilderness Act of 1964*.

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

Wilderness Study Area (WSA): a roadless area or island that has been inventoried and found to have wilderness characteristics as described in Section 2(c) of the *Wilderness Act of 1964* (78 Stat. 891) and as required by Section 603 of the Federal Land Policy and Management Act (FLPMA), has been designated as a Wilderness Study Area, and is managed to preserve its wilderness character, subject to valid existing rights, pending a Congressional determination of wilderness.