Green Springs Mountain Supplemental Evaluation of Lands with Wilderness Characteristics
August, 2013

The western Oregon Districts are updating their wilderness characteristics inventories for areas outside of designated Wilderness or WSAs in support of the RMPs for Western Oregon. In the spring of 2013, the Medford District received a citizen proposal for the Green Springs Mountain inventory unit that was jointly submitted by the Soda Mountain Wilderness Council, Klamath-Siskiyou Wildlands Center, Oregon Wild and The Wilderness Society. The proposal claims it presents new information documenting the existence of wilderness characteristics and summarizes that the inventory presented in the report demonstrates that the lands identified in the report satisfy the agency's criteria for wilderness characteristics as set forth in BLM's manual 6310. The BLM inventory, updated in 2006, identified an area of 2,377 acres. The April 2013 proposal analyzes a boundary consisting of 3,077 acres.

The proposal recognizes that the inventory unit falls well below the minimum 5,000-acre size requirement for areas to possess wilderness characteristics, but provides information on why the organizations feel the area, at 3,077 acres, meets an exception to the minimum size criterion (i.e., BLM Manual 6310, section .06(C)(2)(a)(i)(2)(b), allowing "[r]oadless areas of less than 5,000 acres of contiguous BLM lands where ... [i]t is demonstrated that the area is of sufficient size as to make practicable its preservation and use in an unimpaired condition"). The proposal goes on to support conclusions of naturalness and outstanding opportunities for solitude and a primitive and unconfined type of recreation, of a roadless character, and of unique values that would qualify as supplemental wilderness features if the area is deemed to possess wilderness characteristics.

Size Exception: The citizen proposal portrays the size exception as something added in the latest BLM Manual 6310. However all wilderness criteria, including the minimum size criterion and its exceptions, have remained constant since BLM's original inventories conducted in the 1970s and 1980s under FLPMA, Section 603 (see "Wilderness Inventory Handbook," Part 3, dated September 27, 1978). As such, BLM has applied the same size criterion and exceptions through all phases of wilderness inventories (including the original Section 603 WSA inventories, subsequent Section 202 WSA inventories, and more recent wilderness characteristics inventory updates conducted under Section 201 of FLPMA).

In the entire Oregon wilderness inventory that resulted in 2.6 million acres of WSAs, BLM found only one stand-alone area, Upper Leslie Gulch (3,000 acres), to meet the rigorous requirements of the "sufficient size" exception. That area occupies the remote, topographically diverse, pristine core of a 12,000-acre roadless area that was reduced to 3,000 acres after removing 9,000 acres due to unnatural developments (e.g., highly visible vegetation treatments and mining impacts). The subunit was deemed too small to support outstanding opportunities for solitude, but the core offered outstanding opportunities for "climbing, photography, and sightseeing due to the geologic formations and twisting canyon." The subunit was considered to be self-contained relative to BLM's ability to preserve it in an unimpaired condition (easily identifiable boundaries combined with low vulnerability to surrounding

activities due to its remoteness, extreme topographic diversity, and agency control of surrounding lands).

In contrast, the Green Springs unit is irregularly shaped, narrow, and with numerous private land boundaries, including its entire western and southern boundaries. The entire east side of the proposal is urban interface and/or actively managed timber lands with substantial motorized public access. There appears to be some vegetative and topographic screening, but not to the degree that would effectively shield the unit from activities on surrounding lands. Although the largest contiguous private land holding is presently undeveloped, it is currently for sale with no guarantees as to continued current conditions, or BLM control over activities that could occur on those lands in the future. An example of the lack of control over adjacent private lands is the recent 2012 logging adjacent to the south-southeast portion of the proposal. Although "outside sights and sounds "are generally not to be considered unless they are "omnipresent," smaller units tend to be more vulnerable to such effects, and this particular size exception speaks to the agency's ability to maintain a wilderness setting throughout the unit. The Green Springs Mountain unit's small size and irregular configuration, combined with a preponderance of non-readily identifiable private land boundaries and little or no BLM control over adjacent activities on those lands, appear to make impracticable the area's preservation and use in an unimpaired condition.

Per the BLM Manual 6310, section .06 C. 2. A., if the size requirement is not met, there is no requirement to assess and document naturalness, outstanding opportunities for solitude or a primitive and unconfined type of recreation, or supplemental values. The characteristics of naturalness and outstanding opportunities are not further evaluated because the size exception is not met. However, as the bulk of the citizen proposal detailed a number of special values within the inventory unit, the following section acknowledges that information.

Supplemental Features: The citizen proposal provides a wealth of information regarding special values within the Green Springs Mountain inventory unit. The values described include a complex mosaic of plant communities present in the unit, including late-successional and old-growth conifer forests, oak woodlands, open grasslands, rocky scablands and wet meadows. The importance of the unit as a transitional valley to plateau corridor for wildlife is also described, noting the high habitat values for deer and elk as well as important habitat for numerous sensitive and at-risk vertebrates. The unit provides habitat for several rare and endemic invertebrates including the South Cascades Mardon Skipper butterfly, Keene Creek and Emigrant Creek pebble snails, and the Siskiyou Short-Horned Grasshopper. These values are heightened by the unit's location near the Cascade-Siskiyou National Monument, which was set aside to preserve and highlight ecologically diverse values that derive from the confluence of multiple physiographic provinces in this area. The report makes a strong case that the Monument's values rely on continued overlapping influences that, in turn, depend on climatic, vegetative and wildlife corridors. The Green Springs Mountain unit appears to occupy one of these important corridors.

Although all of these special features have value for land management consideration in their own right, these values cannot be considered as "wilderness supplemental features" in the absence of wilderness characteristics to supplement.

Summary: After assessing the information provided in the citizen proposal, the Medford District finds that the Green Springs Mountain unit lacks wilderness characteristics.

Although the citizen proposal highlights numerous resource values within the Green Springs Mountain inventory unit, these factors are insufficient to overcome the size limitation. As noted above, the Green Springs Mountain unit's small size and irregular configuration, as well as the lack of BLM control over adjacent private lands, appear to make impracticable the area's preservation and use in an unimpaired condition.

Additionally, the validity of BLM's analysis of the Green Springs Mountain Unit was recently challenged in *Soda Mountain Wilderness Council v. BLM* related to the Sampson Cove Timber Sale. The District Court concluded that BLM's 2006 inventory of wilderness character "considered the factors it was required to and documented its findings." The ruling noted that "the court cannot find that the BLM's decision to rely on the 2006 inventory was arbitrary and capricious."

This supplemental evaluation confirms that the conclusions of the 2006 inventory, which determined that wilderness characteristics do not exist in the Green Springs Mountain unit, remain valid.

Approved by:

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Date