Comparison of BLM's Wilderness Characteristic Findings to ONDA's 13 Citizen Proposed Wilderness Study Areas.

* Information in Red text indicates changes due to an updated inventory.

ONDA Unit	BLM Unit	*BLM Subunit*	BLM Acres wilderness characteristics No	BLM Acres wilderness characteristics Yes	ONDA Acres wilderness characteristics Yes	Total BLM Acres	Non – BLM Lands in ONDA's Submission
Branson Creek			3,587	7,682	11,269	11,269	902
	Rudio Mountain		3,587	7,682		11,269	
		A		*7,682*		*7,682*	
		A-1	*49*			*49*	
		A-2	*7*			*7*	
		A-3	*724*			*724*	
		A-4	*2,417*			*2,417*	
		D	*391*			*391*	
Cottonwood Creek			4,628	2,175	6,803	6,803	12,510
	Back Creek			91		91	
	Cottonwood Creek		4,423	1,354		5,777	
		A	*4,150*			*4,150*	
		A-1		*559*		*559*	
		A-2	*273*			*273*	
		C					
		D		*795*		*795*	
	Deep Creek			731		731	
	Young Creek		205			205	
		A	*205*			*205*	
Ferry Canyon Addition			34	2,363	2,397	2,397	1
	Lower John Day WSA Addition		34	2,363		2,397	
		D	*34*			*34*	
		E		*2,363*		*2,363*	
Lower John Day Addition			43	811	854	854	
	Lower John Day WSA Addition		43	811		854	
		A	*43*	*417*		*460*	
		B		*395*		*395*	
Murderers Creek			1,843	1,123	2,966	2,966	38,052
	Aldrich Mountain WSA Add		1,325			1,325	
	Dry Cabin Creek		518			518	
	Little Aldrich Creek			53		53	
		A		*53*		*53*	
	Wylie Gulch			1,070		1,070	
		A-1		*1,070*		*1,070*	
North Fork John Day			24,697	1,641	24,775	26,654	26,245
	Wall Creek		25,013	1,641		26,654	
		A	*24,896*			*23,113*	
		B	*118*			*118*	
		C		*78*		*78*	
		D		*260*		*260*	
		E		*1,304*		*1,304*	
North Pole Ridge Addition			2,635		2,635	2,635	
	North Pole Ridge WSA Additions		2,635			2,635	
		A	2,635			2,635	

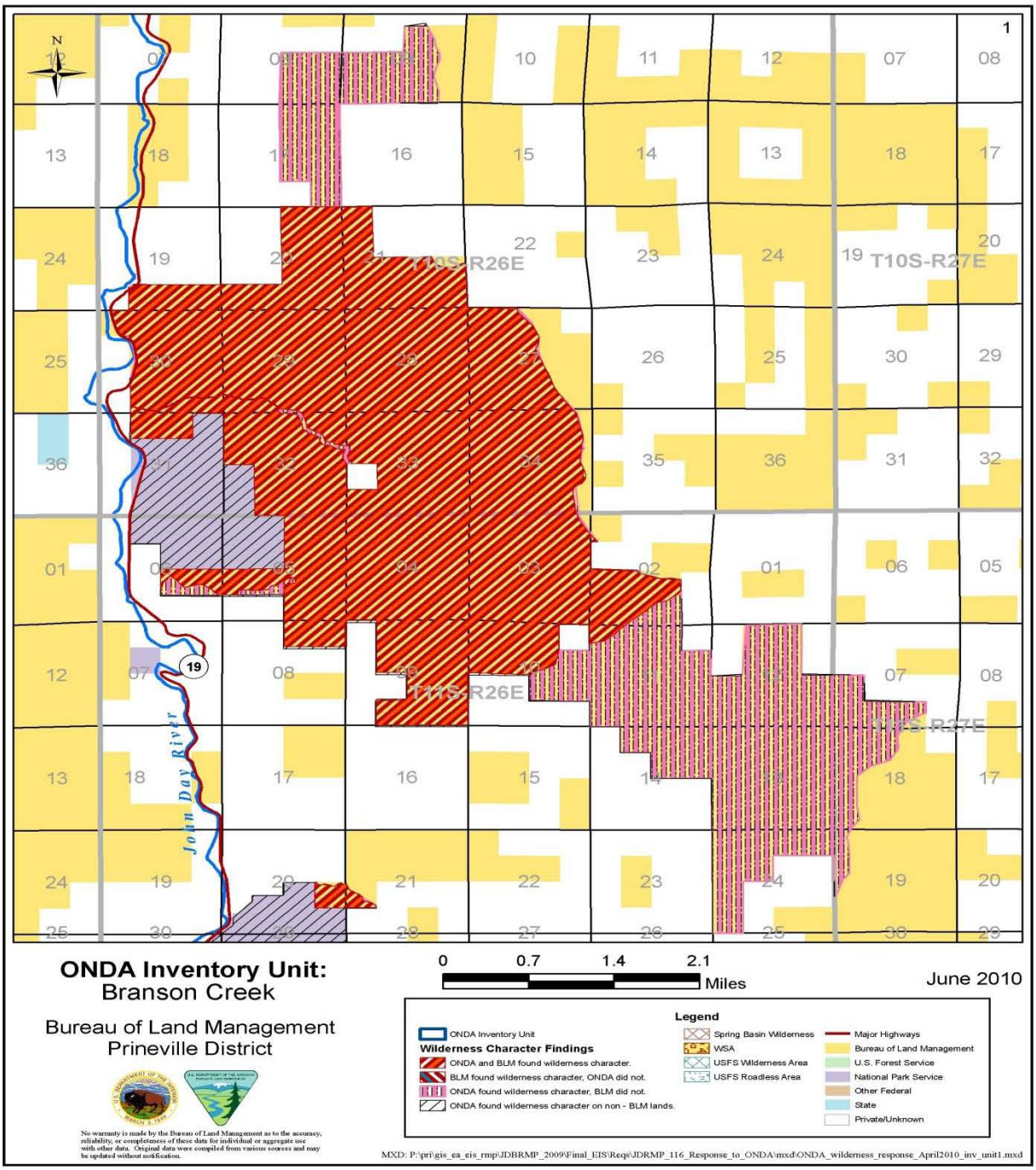
ONDA Unit	BLM Unit	*BLM Subunit*	BLM Acres wilderness characteristics No	BLM Acres wilderness characteristics Yes	ONDA Acres wilderness characteristics Yes	Total BLM Acres	Non – BLM Lands in ONDA's Submission
Painted Hills			**5,073**		5,073	**5,073**	2,009
	Sand Mountain		**5,073**			**5,073**	
		A	4,867			4,867	
		C	206			206	
Pat's Cabin Addition (south)			**3**	**1,931**	1,934	**1,934**	1
	Pats Cabin WSA Addition		**3**	**1,931**		**1,934**	
		B	3	1,931		1,934	
Pat's Cabin Addition (west)			**220**	**2,650**	2,870	**2,870**	2
	Pats Cabin WSA Addition		**220**	**2,650**		**2,870**	
		A		2,650		2,650	
		A-1	220			220	
		E	0			0	
Sheep Rock			**7,493**	**788**	8,281	**8,281**	5,303
	Rudio Mountain		**6,541**			**6,541**	
		B	2,326			2,326	
		C	4,213			4,213	
		D	2			2	
	Sheep Rock		**952**	**788**		**1,740**	
		D		54		54	
		D-1	1			1	
		E		123		123	
		E-1	118			118	
		F		610		610	
		F-1	574			574	
		F-2	259			259	
Sorefoot Creek			**4,999**		4,999	**4,999**	
	North Pole Ridge WSA Additions		**4,999**			**4,999**	
		B	4,895			4,895	
		C	104			104	
Thirtymile Addition				**340**	340	**340**	1
	Thirtymile Creek			**340**		**340**	
		A		253		253	
		B		88		88	
Wind Creek			**953**		953	**953**	5,147
	Frazier Creek		**953**			**953**	
		A	498			498	
		B	456			456	
Total Acres Within ONDA Identified Units			56,211	19,941	76,151	76,151	**90,173**
Additional BLM Inventory Acres			**121,545**	**13,720**	N/A	**135,265**	**N/A**

No attempt was made by the BLM to inventory Non- BLM lands included in ONDA's 13 citizen proposals.

Wilderness Characteristic Determination For Additional BLM Inventory Acres - not identified in ONDA's 13 Citizen Proposed WSAs			
Unit Name	**N**	**Y**	**Total**
Aldrich Mountain WSA Add	**47**		**47**
Back Creek		**31**	**31**
Big Canyon		**1,157**	**1,157**
Bill's Place	**3,903**		**3,903**
Birch Creek	**1**	**601**	**603**
Black Canyon Wilderness Add	**1,106**		**1,106**
Black Snag Springs	**6,479**		**6,479**
Bone Point	**8,609**		**8,609**
Capsutte Creek	**241**		**241**
Clark Canyon		**4,927**	**4,927**
Clarno South	**3,993**		**3,993**
Cottonwood Creek	**6,478**	**44**	**6,523**
Deep Creek	**143**	**54**	**197**
Dixie Creek	**2,473**		**2,473**
Dry Cabin Creek	**4**		**4**
Esau Canyon	**2,336**		**2,336**
Frazier Creek	**191**		**191**
Gable Creek	**5,096**		**5,096**
Horse Heaven	**5,253**		**5,253**
Little Aldrich Creek	**15**	**14**	**28**
Little Canyon Mountain	**2,462**		**2,462**
Lower John Day WSA Addition	**9**	**279**	**288**
Mitchell Landing Strip	**1,967**		**1,967**
North Pole Ridge WSA Additions	**10,815**		**10,815**
Pats Cabin WSA Addition	**1,822**	**463**	**2,285**
Priest Hole	**4,984**		**4,984**
Rudio Mountain	**7,035**	**17**	**7,052**
Sand Mountain	**388**		**388**
Sheep Rock	**11,705**	**14**	**11,720**
Spring Basin WSA Addition	**8,774**		**8,774**
Starvation Lane	**4,965**		**4,965**
Stephenson	**434**		**434**
Stoney Creek	**11,641**		**11,641**
Sutton Mtn WSA Addition	**296**	**521**	**817**
Thirtymile Creek		**46**	**46**
Wall Creek	**1,884**		**1,884**
Wylie Gulch	**5,967**	**5,551**	**11,518**
Young Creek	**27**		**27**
Total Acres	**121,545**	**13,720**	**135,265**

For each unit where ONDA found wilderness characteristics to be present, ONDA's submission describes the condition of the landscape in terms of naturalness, the opportunity for solitude and primitive recreation, and supplemental values they found to be present in the unit. The BLM review and inventory update also evaluated for each unit, naturalness, the opportunity for solitude and primitive unconfined recreation, as well as supplemental values, including the supplemental values identified by ONDA and made the following determinations:

1. **Branson Creek Unit**



Lands within ONDA's Branson Creek Unit were not inventoried by BLM during the agency's original 1979 wilderness inventory effort, for reasons unknown to current BLM staff. However, as a result of the new RMP effort, the Prineville BLM inventoried all of the lands within ONDA's Branson Creek Unit within BLM's Rudio Mountain Unit (OR 054-027). The lands found to possess wilderness characteristics by ONDA were covered by the BLM inventory update as BLM Subunit A and a portion of BLM Subunit D, both of the BLM Rudio Mountain Inventory Unit. BLM also found a portion of these same lands to possess wilderness characteristics. The lands that ONDA found to lack wilderness characteristics were inventoried by BLM as portions of BLM Subunits B and D of the Rudio Mountain Inventory Unit. BLM also found these areas to lack wilderness characteristics. Both ONDA and BLM dropped

several small portions of lands located east of ONDA route BCg from further wilderness review as this route is an active BLM Right-of-Way (ROW) and a BLM-maintained segment of Holmes Creek Road.

For the lands ONDA found to possess wilderness characteristics, ONDA described the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation they found to be present. ONDA's submission also states that the lands possess other significant natural resources, including old growth forest ecological values that contribute to critical wildlife habitat, and significant paleontological resources. The BLM review and inventory evaluated naturalness, the opportunity for solitude, and the opportunity for primitive unconfined recreation, as well as supplemental values, including the supplemental values identified by ONDA and made the following determinations:

Naturalness: The BLM found that some of the lands are in a natural condition and some are not. BLM notes that ONDA road BCr is a Grant County road, as ONDA also recognizes. Both BLM and ONDA identify routes BCn and BCg as roads. The BLM inventory update found that the middle segment of BLM Route A, identified by ONDA as Way BCb, does not qualify as a road, even though it was recently bladed as a result of a wildland fire incident, because BLM does not intend that it be maintained for motorized use in the future due to hydrology concerns. However, the BLM update found that the upstream and downstream segments of BLM Route A qualify as a road because these segments provide the only access into private inholdings. ONDA identified a number of additional routes as ways including: BCp, BCm, BCk and BCj, BCt, BCw and BCs1. The BLM found that four of these routes qualify as roads, including BCp, BCm, BCk, and BCt. BLM did not evaluate ONDA routes BCj, BCk, and BCs1, although the BLM staff believes these to be primitive routes that do not qualify as roads.

BLM also located a route identified as BLM Route C, located to the west of ONDA route BCm and evaluated it, which ONDA did not, finding that the southwest portion of this route did qualify as a road, and the northwest portion of the route did not.

The BLM staff identified that there were areas in the vicinity of Branson Creek where extensive vegetation treatments had occurred recently, chiefly through fire.

Outstanding Opportunities for solitude: ONDA notes that the drainages and vegetation offer screening and a sense of concealment. BLM also found an outstanding opportunity for solitude.

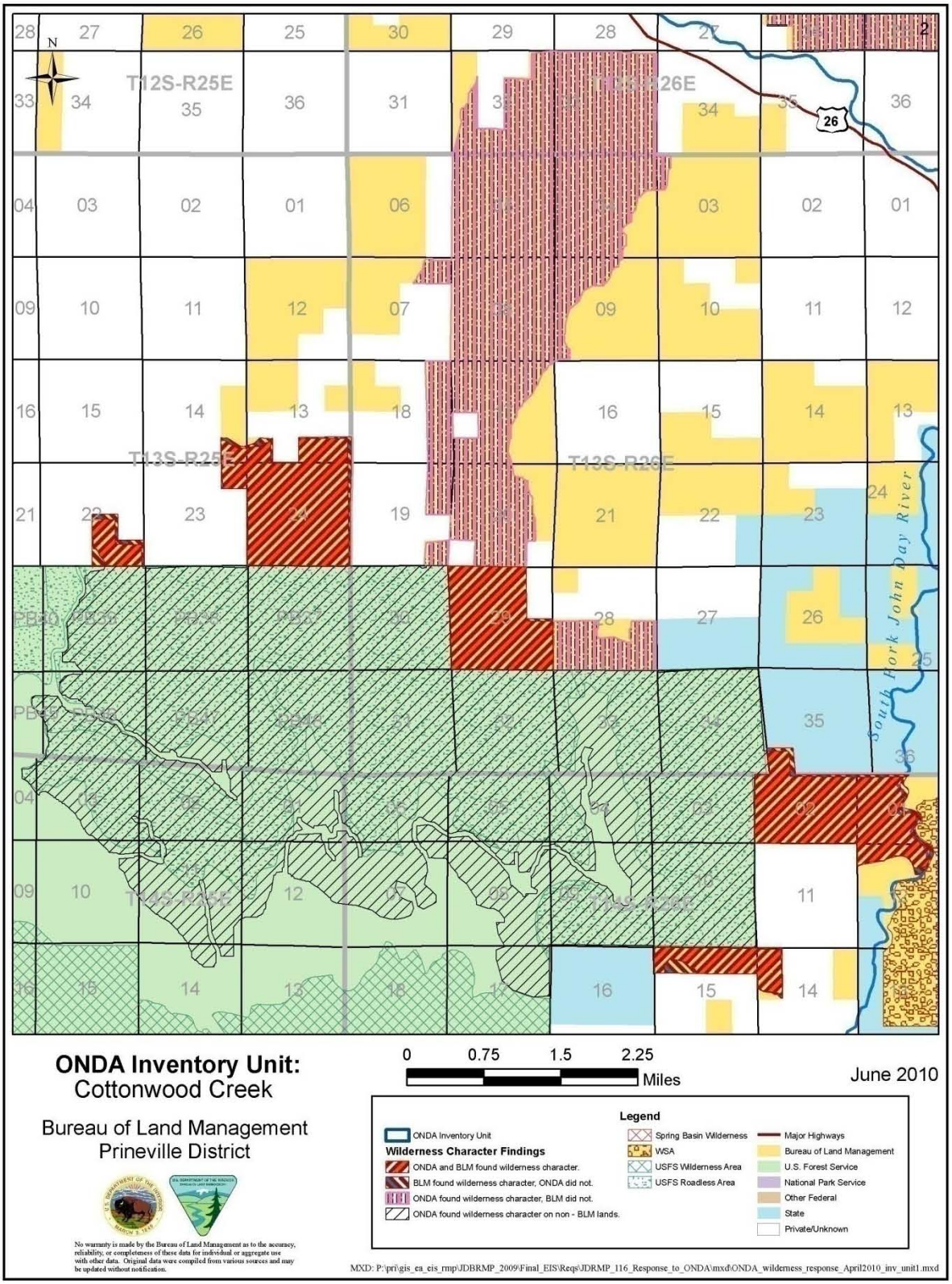
Outstanding Opportunities for Primitive Recreation: ONDA notes that the drainages and vegetation offer screening and a range of outstanding primitive recreational opportunities such as wildlife viewing, hiking, and hunting. The BLM staff also found outstanding opportunities for primitive, unconfined recreation.

Supplemental Features: Both ONDA and BLM identified supplemental values of wildlife habitat and paleontological resources.

Determination - BLM found a large portion of BLM Subunit A to possess wilderness characteristics. However, BLM found that the southeast portion of BLM Subunit A does not possess wilderness characteristics because Route A has been determined to be a road that would be maintained as necessary using mechanical means, and this route separates this portion from the rest of BLM Subunit A. BLM found that 47 acres located south of BLM Route G do not possess wilderness characteristics because Route G has been determined to be a road that would be maintained as necessary using mechanical means, and this route separates these acres from the rest of BLM Subunit A. BLM also found that a narrow, irregular extension of land near the north boundary of BLM Subunit A does not possess wilderness characteristics because, though meeting the naturalness criteria, it does not possess the opportunity for solitude or primitive recreation due to its narrow and irregular shape.

BLM found that BLM Subunit D did not possess wilderness characteristics because Route E has been determined to be a road that would be maintained as necessary using mechanical means, and this route separates BLM Subunit D from BLM Subunit A, and the lands segregated lands do not meet the minimum size requirements to be considered as wilderness on their own.

2. Cottonwood Creek Unit



Lands within ONDA's Cottonwood Creek Unit were inventoried by the Burns District and the Prineville District of the BLM as part of BLM's Initial Wilderness Inventory effort, and were assessed as the Cottonwood Creek Unit (OR 2-110), the Canyons II Unit (OR 2-108), and the Canyons Unit (OR-5-12). All management responsibility for the public lands in the area was later transferred to the Prineville BLM District.

The Initial BLM Wilderness Inventory for Unit OR-2-110 (2007 BLM Subunit A) found the area to be in a relatively natural condition, but to lack outstanding opportunities for solitude and primitive, unconfined recreation. 2007 BLM Subunit D was originally inventoried because it was adjacent to USFS Rare II lands, but when the USFS lands were dropped from wilderness consideration, the BLM area was also dropped as it was considered too small for further consideration as wilderness. The lands in 2007 BLM Subunits B, C, and E were not previously inventoried because they were considered to be too small in size to meet wilderness review requirements.

The land that ONDA found to have wilderness characteristics in their submission was covered by the BLM inventory update as parts of four separate BLM inventory units including BLM Subunits A and D of the Cottonwood Creek Unit (OR 054-028), and all of the Back Creek Unit (OR-054-036), Deep Creek Unit (OR 054-030) and Young's Creek Unit (OR 054-024).

In their inventory update of the Cottonwood Creek Unit (OR 054-028), BLM found that BLM Subunit D and a portion of BLM Subunit A possess wilderness characteristics. Other lands which ONDA inventoried and found did not possess wilderness characteristics were also inventoried by the BLM in their inventory update as BLM Subunits B, C, and E of the BLM Cottonwood Creek Unit (OR 054-028). The BLM inventory update effort also found that these lands lack wilderness characteristics.

For the lands ONDA found to possess wilderness characteristics ONDA addressed the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation. ONDA's submission also states that the lands possess other significant natural resources, including important ecological values; visual resources; has important habitat considerations, and endangered species (steelhead) are present. The BLM review and inventory update resulted in the following determination on the values ONDA identified as significant:

Naturalness: ONDA and BLM both identified a BLM road as the boundary of BLM Subunit A (identified as #2110 by ONDA, and #6206 by BLM). The ONDA submission found all of BLM Subunit A to be in a natural condition, while and the BLM inventory update both found most of BLM Subunit A to be in a natural condition, except areas where approximately 320 acres of past timber harvest, a small area of juniper cuts, and a reservoir occur. BLM found the areas containing these human disturbances to be unnatural. Both ONDA and BLM found all of BLM Subunit D and similar portions of Back Creek Unit (OR-054-036), Deep Creek Unit (OR 054-030) and Young's Creek Unit (OR 054-024) to be in a natural condition.

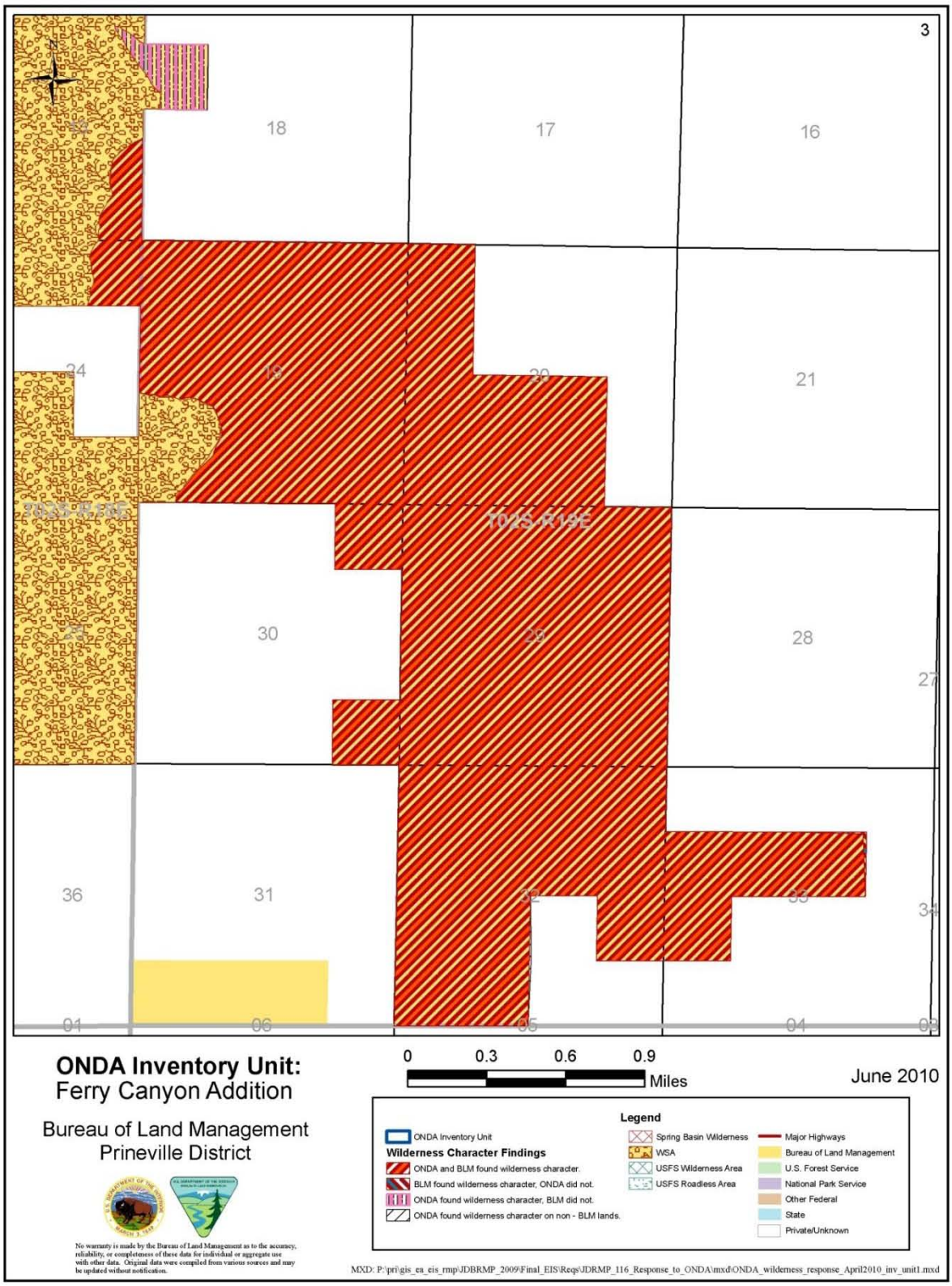
Outstanding Opportunities for Solitude: The ONDA submission asserts that there is outstanding opportunity for solitude across their entire inventory unit, while the BLM inventory update found that most of BLM Subunit A did not possess outstanding opportunities for solitude. The BLM staff based their conclusion on audible experiences while on site – OHVs were observed and heard at distances on the lower open slopes of the unit. The BLM staff concluded that there is a lack of screening which reduces the expectation of solitude to one of less than outstanding in most of BLM Subunit A, except in the higher elevations adjacent to the USFS lands. Both ONDA and BLM found all of BLM Subunit D and similar portions of Back Creek Unit (OR-054-036), Deep Creek Unit (OR 054-030) and Young's Creek Unit (OR 054-024) to offer outstanding opportunities for solitude.

Outstanding Opportunities for Primitive Recreation: ONDA believes their entire inventory unit possesses outstanding opportunities for primitive recreation. The BLM staff believes that portions of the unit which are adjacent to USFS Roadless Area share the outstanding opportunities for primitive recreation found on the USFS lands - those with the similar topography and vegetation characteristics, but that the remainder of Subunit A lacks outstanding levels of recreation opportunities. Both ONDA and BLM found all of BLM Subunit D and similar portions of Back Creek Unit (OR-054-036), Deep Creek Unit (OR 054-030) and Young's Creek Unit (OR 054-024) to offer outstanding opportunities for primitive recreation.

Supplemental Features: ONDA states that the views are expansive and the landscape scenic, and the BLM staff concurs with the assessment.

Determination - From the evidence presented in ONDA's submission, as well as other relevant information (which includes documentation from prior BLM inventories, aerial photographs, field observations, maps, staff personal knowledge, etc.), BLM concludes that the determination reached that the area does not possess wilderness characteristics in previous BLM inventories remains valid for the most part. However, the BLM does agree that a portion of the public lands adjacent to the USFS lands - those with the similar topography and vegetation characteristics – do possess wilderness characteristics (this is BLM Subunit D and the southern portion of BLM Subunit A of the Cottonwood Creek Unit, all of the Back Creek unit, most of the Deep Creek Unit, and most of the Young's Creek Unit).

3. Ferry Canyon Unit



The lands in ONDA's Ferry Canyon Unit overlap a portion of a larger BLM inventory update unit (BLM Subunits D and E of the Lower John Day WSA Additions Unit OR-054-021). The Initial BLM Wilderness Inventory included these lands as part of the Lower John Day Unit (OR 5-6) and dropped these lands from further study, based on the condition and use of area roads at that time.

The ONDA submission found all of BLM Subunits D and E of the BLM Lower John Day WSA Additions Unit to possess wilderness characteristics. The BLM inventory update found most of these lands to possess wilderness characteristics, except for of a 34 acre

parcel (all of BLM Subunit E) which BLM found to lack wilderness characteristics because it is separated from the adjacent WSA by a road.

For the lands ONDA found to possess wilderness characteristics ONDA addressed the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation. ONDA's submission also states that the lands possess other significant natural resources, including important habitat for native wildlife including the California bighorn sheep and spawning habitat for threatened steelhead, and the supplemental values associated with the adjacent WSA lands. The BLM review and inventory update resulted in the following determination on the values ONDA identified as significant:

Naturalness: ONDA notes that the area was inventoried initially and probably eliminated at that time due to the presence of a number of roads, and states that these roads are no longer used to the level of the definition of road. ONDA indentifies routes LJD2a, LJD2b, LJD3a, and LJD3b as ways and offers photographic evidence. The BLM inventory update identified ONDA's route LJD3b as a primitive route where located in the WSA, but determined it to be road where located inside the inventory unit. BLM determined that ONDA's route LJD2a (BLM Route C) is a primitive route that no longer qualifies as a road and that the Ferry Canyon is now directly adjacent to the Lower John Day WSA. Consistent with the initial inventory, ONDA route LJD2b (BLM Route D) was determined by BLM to be a primitive route and is in need of closure for hydrological concerns. BLM determined that Route LJD3a (BLM route B) is still a road that is open for access to private property, and that this road separates BLM Subunit D from the adjacent WSA.

BLM found BLM Subunit E to be in a natural condition, but found that BLM Subunit D was not in a natural condition because it was separated from the adjacent WSA by Route B, which BLM determined to be a road.

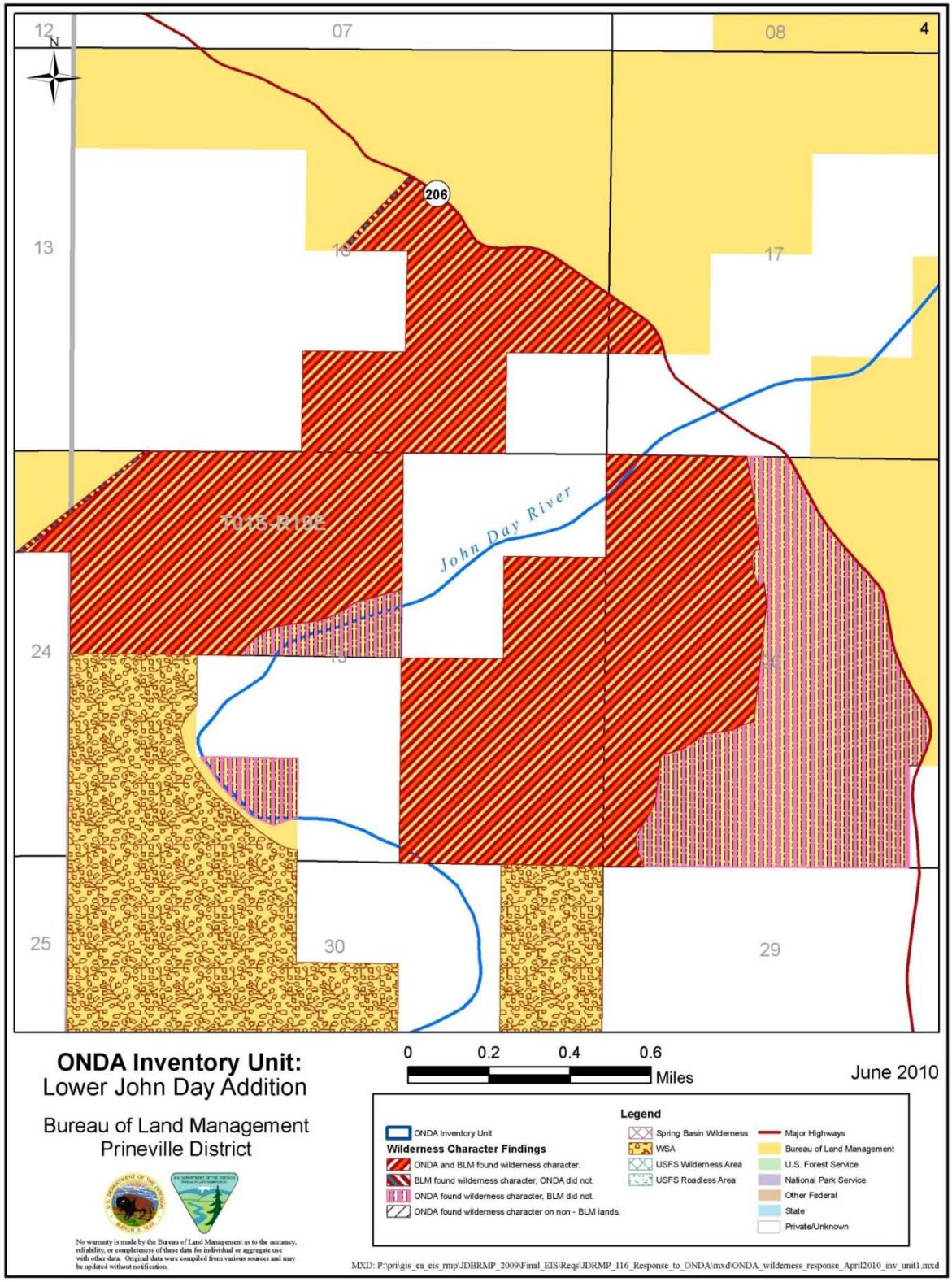
Outstanding Opportunities for Primitive Recreation: ONDA notes that the area is now contiguous with the WSA as well as having topographical screening which create outstanding opportunity levels for primitive recreation. BLM agrees with this assessment.

Outstanding Opportunities for solitude: ONDA notes that Ferry Canyon and the adjacent WSA create an outstanding opportunity for solitude, and the BLM agrees, and notes that the levels of use are low and the expectation of meeting someone is remote.

Supplemental Features: Valuable wildlife habitat and scenery were features noted by ONDA. The BLM agrees with this assessment and notes that the WSA effort identified other supplemental values as well.

Determination – The BLM inventory update found BLM Subunit E to possess wilderness characteristics. The BLM inventory update found that a road (Route B) separates BLM Subunit D from the adjacent WSA and eliminates Subunit D from further review.

4. Lower John Day Unit



The ONDA submission for the Lower John Day Addition evaluated three small parcels of lands acquired by the BLM after 1991. BLM identified these lands as BLM Subunits A and B of its larger Lower John Day WSA Addition Unit (OR 054-021). These lands have not been previously inventoried.

The ONDA submission found all of BLM Subunits A and B of the BLM Lower John Day WSA Additions Unit to possess wilderness characteristics. The BLM inventory update found most of these some lands to possess wilderness characteristics, but used an active

transmission line ROW as the northeast boundary of BLM Subunit B, which eliminated some of the lands in Subunit B from further review. Also, BLM identified a road in BLM Subunit A (BLM Route A) that separates two small parcels from the rest of the subunit, and these parcels are not large enough to be considered for wilderness on their own. However, if the status of BLM Route A changes in the future from a road to a primitive route, the BLM recommends that these two small parcels be re-evaluated for wilderness characteristics.

For the lands ONDA found to possess wilderness characteristics ONDA addressed the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation. ONDA's submission also states that the lands possess other significant natural resources, including the John Day Wild and Scenic River, the steelhead habitat which the river provides, potential habitat for California bighorn sheep, and the values associated with the adjacent WSA lands. The BLM review and inventory update resulted in the following determination on the values ONDA identified as significant:

Naturalness: ONDA found one vehicle route in the unit (LJD5) and did not classify it as either a way or a road, but BLM was able to identify it as a road in T. 1 S., R. 19 E., Section 20, which is associated with an active 50 foot wide BPA ROW (OR 010407). This bisects the unit (BLM Subunit B) from north to south.

The ONDA submission identified one Bonneville Power Administration (BPA) transmission line as the northwestern boundary of their inventory unit, but ONDA did not note a second BPA transmission line and associated access road ROW located in the southeast portion of the ONDA unit. BLM used these BPA ROWs as subunit boundaries, excluding the lands outside of these ROWs, finding the excluded parcels too small to be considered as wilderness.

Outstanding Opportunities for Solitude: ONDA references the BLM's 1991 WSA Report to make their case that the adjacent lands possess the same outstanding opportunity for solitude. BLM agrees with that conclusion in its inventory.

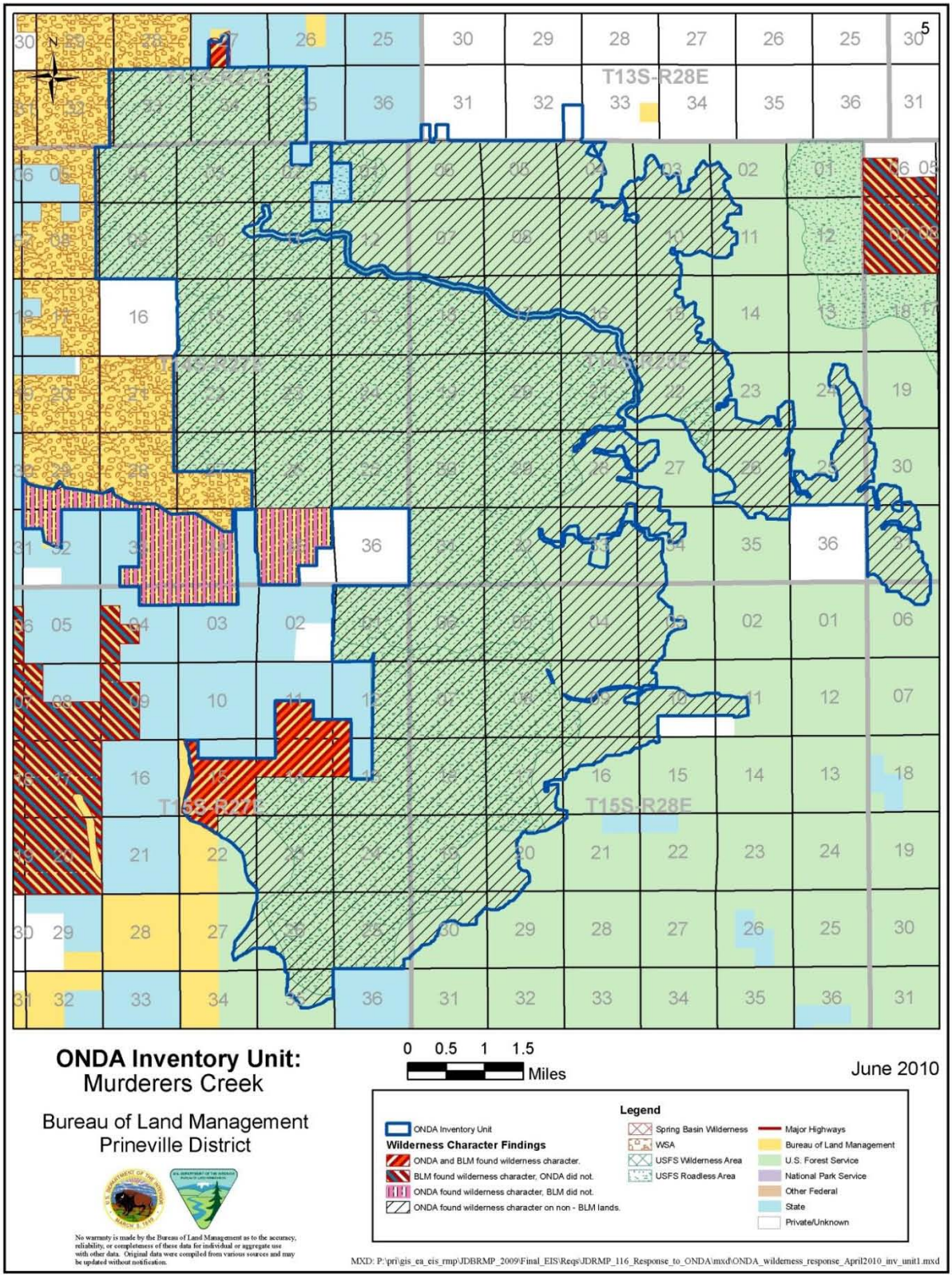
Outstanding Opportunities for Primitive Recreation: ONDA references the BLM's 1991 WSA Report to make their case that the adjacent lands possess the same outstanding opportunity for primitive recreation. BLM agrees with that conclusion in its inventory update.

Supplemental Features: ONDA lists supplemental values for the unit which include the John Day Wild and Scenic River, steelhead habitat which the river provides, potential habitat for California bighorn sheep, and the values associated with the adjacent WSA lands including the of prehistoric and historic sites of potential national register condition in the adjacent WSA. BLM agrees.

Determination – The BLM inventory update found that some of the lands in ONDAs inventory unit possess wilderness characteristics. The BLM found that the active ROW which is present (ONDA Route LJD5) eliminates a segment of lands which ONDA found to posses wilderness characteristics. BLM also found that two small parcels of land along the river are separated from the rest of the ONDA unit by a road (BLM Route A in BLM Subunit A), and these two parcels are too small to be considered for wilderness on their own. However, BLM Route A is in the process of having future motorized access determined by the State of Oregon and if BLM Route A is closed, then BLM recommends that the inventory for BLM Subunit A be updated.

BLM also inventoried a 35 acre parcel in this vicinity which is adjacent to the Lower John Day WSA in T. 1 S., R 19 E., Section 32, (BLM Subunit C), which ONDA did not. The BLM Inventory found BLM Subunit C to possess wilderness characteristics.

5. Murderer's Creek Unit



Some of the lands in ONDA's Murderer's Creek unit were assessed during the Initial BLM Wilderness Inventory as the Dry Cabin Parcel II Unit (OR-2-104) and the Shake Table Unit (OR-2-106), and have been assesses in the BLM inventory update as the Little Aldrich Creek Unit (OR 054-034), the Dry Cabin Creek Unit (OR 054-033), the Aldrich Mountain WSA Addition (OR 054-029) and the Wylie Gulch Unit (OR 054-032). The 1979 Initial Wilderness Inventory found that the parcels inventoried were not of sufficient size to be considered as wilderness.

The ONDA submission and the BLM inventory update both found that BLM's Little Aldrich Creek unit and BLM Subunit A-1 of Wyllie Gulch Unit possess wilderness characteristics. The ONDA submission found the lands in BLM's Dry Cabin Creek Unit and Aldrich Mountain WSA Addition Unit to possess wilderness characteristics, while the BLM inventory update found that these lands did not possess wilderness characteristics. The rest of the lands ONDA inventoried and found to possess wilderness characteristics are located on USFS lands.

For the lands ONDA found to possess wilderness characteristics ONDA addressed the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation. ONDA's submission also states that the lands possess other significant natural resources, including important wildlife habitat, and habitat for summer steelhead and native redband trout in Murderers Creek. The BLM review and inventory update resulted in the following determination on the values ONDA identified as significant:

Naturalness: ONDA notes the presence of a few ways and roads. They have classed routes MCq, MCx and MCy as ways, and state that although created by mechanical means they are presently little or not used. BLM's inventory update found that ONDA route MCq (BLM Route A in Aldrich Mountain WSA Addition Unit) qualifies as a road because it is maintained with mechanical equipment for administrative access to the Oregon Department of Fish and Wildlife's P. W. Schneider Wildlife Area. This road (BLM Route A) separates the inventory unit from the adjacent WSA, and the separated parcel is too small to be considered as wilderness. ONDA and BLM agree that ONDA route CGh (BLM Route D in the Wylie Gulch Unit) is a road.

There are areas of invasive Medusahead present in the ONDA unit, which have reduced the natural condition, and there have been a number of prescribed burns, spraying, tilling, drilling and seeding to eliminate this species in portions of the area. The treated lands include nearly the entire BLM Aldrich Mountain WSA Addition Unit (OR 054-029). These projects started in 1992 and continued through 2005 on BLM lands, with additional projects still being conducted on adjacent lands and the intention is to continue to maintain the treatment operation throughout the entire area. BLM found that these treated areas are not in a natural condition.

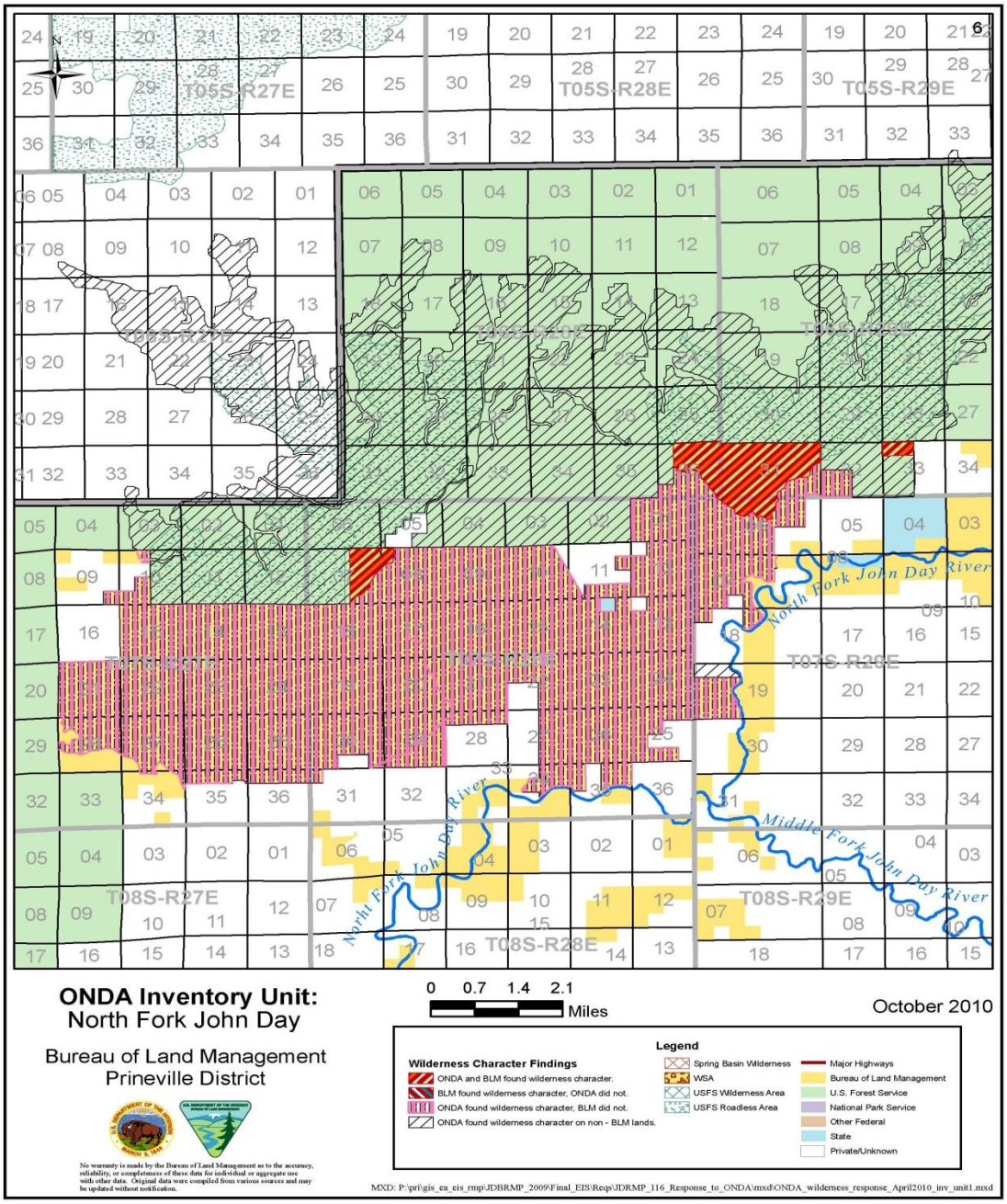
Outstanding Opportunities for Solitude: ONDA makes a case that their entire inventory unit (40,000 acres) offers outstanding opportunities solitude due to its size, topography, and screening vegetation attributes. The BLM review for the smaller individual parcels of public lands indicate that locally not all the ONDA unit offer these opportunities at an outstanding level. The BLM inventory update found that the BLM Little Aldrich Creek Unit (south of a BLM and ONDA recognized road) has opportunities for solitude that are outstanding when considered in association with the adjacent Aldrich Mountain WSA, and Subunit A-1 of the BLM Wylie Gulch Inventory Unit has outstanding opportunities for solitude when considered is association with the adjacent USFS Shaketable Roadless Area. BLM did not evaluate the BLM Dry Cabin Creek Unit and Aldrich Mountain WSA Addition Unit for solitude since they were not found to be in a natural condition by BLM.

Outstanding Opportunities for Primitive Recreation: Similar to the solitude considerations, ONDA makes a case that their entire area (40,000 acres) offers outstanding opportunities for primitive recreation due to its size, topography, and screening vegetation attributes. The BLM review for the smaller individual parcels of public lands indicate that locally not all the ONDA unit offer these opportunities at an outstanding level. The BLM inventory update found that the Little Aldrich Creek Unit (south of a BLM and ONDA recognized road) has opportunities for primitive recreation that are outstanding when considered in association with the adjacent Aldrich Mountain WSA, and Subunit A-1 of the BLM Wylie Gulch Inventory Unit has outstanding opportunities for primitive recreation when considered is association with the adjacent USFS Shaketable Roadless Area. BLM did not evaluate the BLM Dry Cabin Creek Unit and Aldrich Mountain WSA Addition Unit for primitive recreation since they were not found to be in a natural condition by BLM.

Supplemental Features: ONDA states that the area has important habitat for mule deer, elk, summer steelhead (a threatened species), and native redband trout. BLM concurs with this since the area, including both state and public lands, is managed as a State Wildlife Management Area for these species.

Determination - The BLM inventory both found that BLM's Little Aldrich Creek Unit and BLM Subunit A-1 of Wyllie Gulch Unit possess wilderness characteristics. The BLM inventory update found that the lands assessed in BLM's Dry Cabin Creek Unit and Aldrich Mountain WSA Addition Unit do not possess wilderness characteristics.

6. **North Fork John Day River Unit** **(this map represents the updated findings)**



The ONDA North Fork John Day submission covers lands which were acquired by exchange and which had never been previously inventoried. The BLM inventory update has assessed these lands as the Wall Creek Unit (OR 054-042). The BLM inventory update boundary for the Wall Creek Unit is similar to ONDA's North Fork proposal with one major difference; the BLM unit did not include any USFS lands. Small differences include the BLM not including lands south of the power line between Little Wall Creek and Birch Creek, and the BLM including some lands east and south of the river in the Wrightman Canyon area.

The lands ONDA found to possess wilderness characteristics are BLM Subunits A and C, while the BLM inventory update found only BLM Subunit C, D, and E to possess wilderness characteristics. Refinements to BLM's wilderness characteristics inventory that resulted in finding areas with wilderness characteristics in two additional areas (new units D and E) were a result of discussions with ONDA related to the size and delineation of unit A. The concern expressed was that due to the size of the unit there may be blocks of 5,000 acres within that unit that possessed wilderness characteristics. BLM re-evaluated this unit and found no areas with wilderness characteristics in blocks of 5,000 acres or more within the unit; however, units D and E were identified as areas with wilderness characteristics due to their adjacency to Forest Service lands possessing wilderness characteristics. For the lands ONDA found to possess wilderness characteristics ONDA addressed the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation. ONDA's submission also states that the lands possess other significant natural

resources, including the North Fork John Day River which is designated as an Oregon Scenic Waterway, and provides habitat for salmon, steelhead, and habitat for other species of fish and wildlife, as well as a variety of native plants and wildflowers. The BLM review and inventory update resulted in the following determination on the values ONDA identified as significant:

Naturalness: The ONDA submission states that the lands are primarily in natural condition, with some exceptions due to human improvements and actions, such as access roads, and active ROWs and some previously logged areas. The BLM inventory update found that BLM Subunit A has received extensive timber operations conducted throughout almost the entire area is bisected by several roads and found that substantial portions of the unit are not in a natural condition. BLM found the small BLM Subunits C, D, and E to be in a natural condition.

The ONDA submission identifies several roads in their unit, which they have cherry-stemmed out of the unit. This includes NFbt and NFy (both on USFS lands). The ONDA submission characterizes the following routes as substantially unnoticeable ways identified as: NFba, NFbb, NFbb1, NFbe, NFbe2, NFBh, NFbi, NFbi2, NFbo, NFbo2, NFbs, NFbs7, NFbti, NFbtia, NFbt1c, NFbu, NFbw, NFx1, NFx4, NFX5, NFx5A, NFx5b, NFxfc, NFx7a, NF7b, NFx8, NFy1, NFy2, NFz, NFz1, NFz2, NFz3, NFz4, NFZ5, NFz6, NFz7, and NFz8.

The BLM inventory update identified that County Roads 3058 and 3407, along with BLM Route A bisect the unit. The BLM also identified a large number of primitive routes in its inventory update, including a number of substantially unnoticeable ones, but also a number of primitive routes which the BLM believes to be noticeable. BLM determined that BLM Routes B (NFbi2), C (NFy2), D (NFz), E (NFz2), F (NFx8) and G (NFba) qualify as roads that would be maintained as necessary by mechanical means and are open seasonally to public motorized travel. BLM also noted that there is an active ROW on Route A (NFbo2) to a communication site, which may require mechanical maintenance of the road when warranted.

Outstanding Opportunities for Solitude: ONDA states that size, screening and topography over their entire unit (BLM and USFS lands) provide outstanding opportunities for solitude. BLM agrees that the entire area does have an outstanding level of solitude and is actively managing for its enhancement.

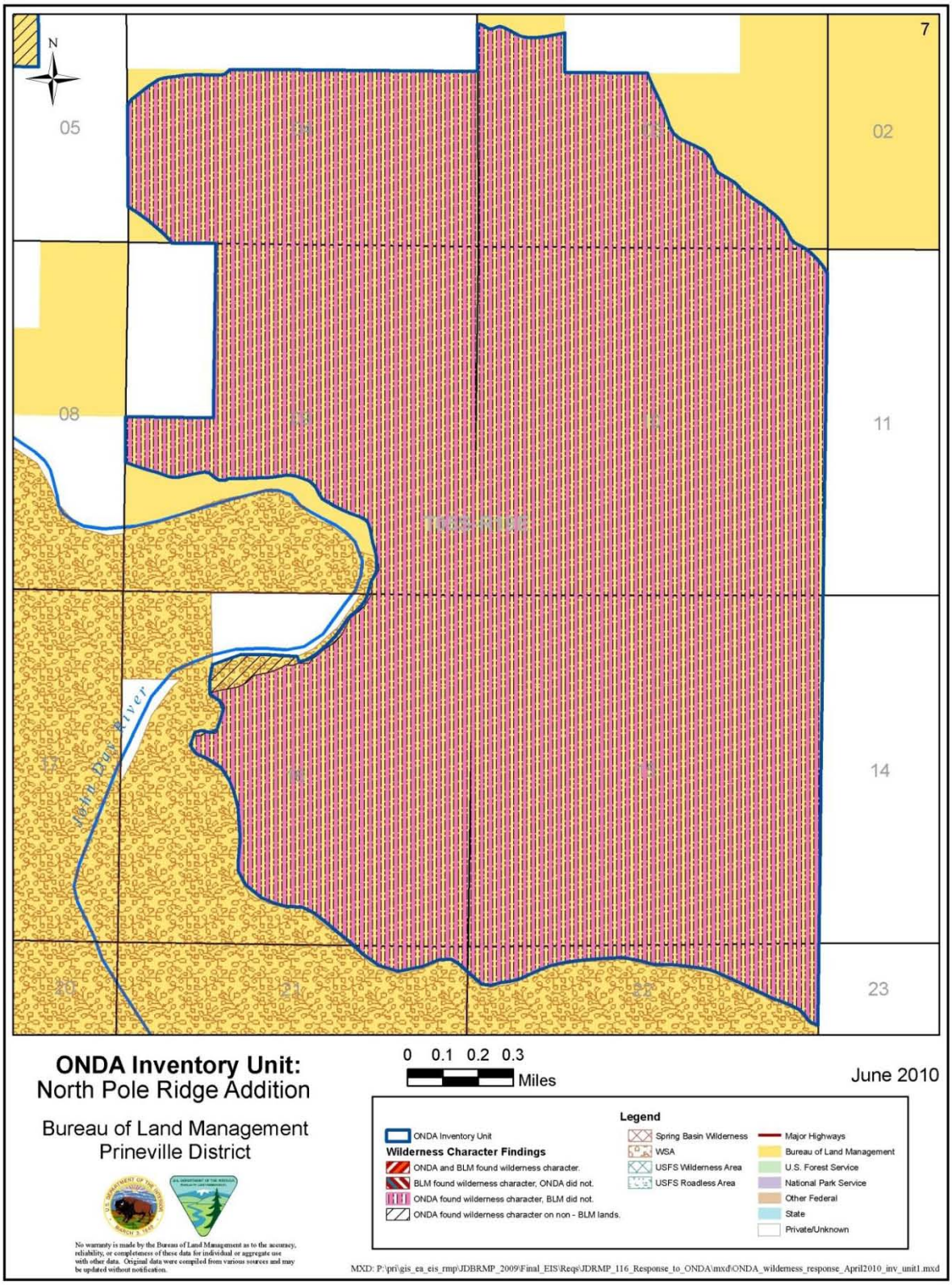
Outstanding Opportunities for Primitive Recreation: ONDA states that size, screening and topography over their entire unit (BLM and USFS lands) provide outstanding opportunities for primitive recreation. ONDA mentions the designation of the North Fork of the John Day River as an Oregon Scenic Waterway for its outstanding recreational purposes. BLM agrees that the entire area (not just the lands ONDA found to possess wilderness characteristics) does offer and attract a wide range of recreational activities, including primitive opportunities. BLM is actively managing the area for its recreation opportunities while protecting wildlife and fish habitats. The lands were acquired under the provision that they be primarily managed for their outstanding recreation potential and their fish and wildlife habitat

Supplemental Features: Supplemental features described by ONDA include the area's scenic qualities including specifically the designation of the North Fork of the John Day River as an Oregon Scenic Waterway, important wildlife habitat including NOAA designated critical habitat for summer steelhead, rearing habitat for Chinook salmon, and the presence of a wide variety of plant and animal life commonly found in the region. BLM agrees. The legislation requires that BLM manage the fish and wildlife habitat as a specific priority.

Determination – The BLM inventory update found that the main area, BLM Subunit A, does not possess wilderness characteristics, because past human activities, especially the timber harvest road network, reduce the naturalness of the unit. The BLM inventory update found that Subunit A, C, D, and E possess opportunities for primitive recreation and solitude at an outstanding level.

BLM stresses that the lands were acquired with the specific legislative intent to maintain the native fish and wildlife habitat while providing for recreational opportunities. Other uses would be allowed only if they were consistent with these primary management goals. When the lands were acquired some areas had been logged several times, although not clear cut, and there existed a network of old logging roads throughout much of the area. Since acquiring the lands, BLM has taken management steps which, although done to improve wildlife conditions, also improve the natural condition of the unit, such as blocking some routes to motorized uses. In the future, other management actions may also be implemented (such as vegetation treatments using mechanical, fire or chemical methods). The goal of these actions will be to ultimately improve the primary resources in the long run. As a result of these types of actions, future re-inventory of wilderness characteristics may find that the area does possess naturalness.

7. North Pole Ridge Unit



The ONDA North Pole Ridge Addition submission covers the lands inventoried by the BLM inventory update as BLM Subunit A of the North Pole Ridge WSA Addition (OR 054-020). The BLM North Pole Ridge inventory unit (OR-054-020) included additional lands; Subunit B, which ONDA addressed in their Sorefoot Unit and BLM Subunit C, which ONDA did not address.

Some of the lands in the ONDA unit were acquired by BLM in a 1986 land exchange and most have been inventoried in the past. Most of the acquired lands were located adjacent to the existing North Pole Ridge WSA. In 1995-1998, the BLM completed a wilderness inventory for the acquired lands and added 1,280 acres to the existing WSA. The inventory found that the lands lacked wilderness characteristics because they were separated by a road from other lands found to have wilderness character, and the separated lands were too small to be considered as wilderness. The current BLM inventory update found that the road mentioned in the previous inventory still separates today's inventory unit from the adjacent WSA.

For the lands ONDA found to possess wilderness characteristics ONDA addressed the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation. ONDA's submission also states that the lands possess other significant natural resources, including the John Day River which is designated as a Wild and Scenic River and an Oregon Scenic Waterway, and excellent habitat for the California bighorn sheep. The BLM review and inventory update resulted in the following determination on the values ONDA identified as significant

Naturalness: ONDA route Tc3 (BLM Route A) was determined to be a road by both ONDA and BLM, and both used it as a unit boundary, dropping the lands east of the road from further review.

For the lands found by ONDA to possess wilderness characteristics, the ONDA submission included routes Tc6 as a road and then a way, and Tc7 and Tc9 as ways. The BLM inventory update found ONDA route Tc9 (BLM Route C) to be a primitive route that did not qualify as a road. However, the BLM inventory update found ONDA route Tc6 and Tc7 (both identified as BLM Route B) to qualify as a road that would be maintained as necessary with mechanical means in order to provide access for grazing management. The current inventory update agrees with the previous BLM inventory, identifying BLM Route B as a road. Both the current and previous BLM inventories found that BLM Route B separates the inventory unit from the adjacent WSA, and the remaining lands are too small to be considered as wilderness on their own.

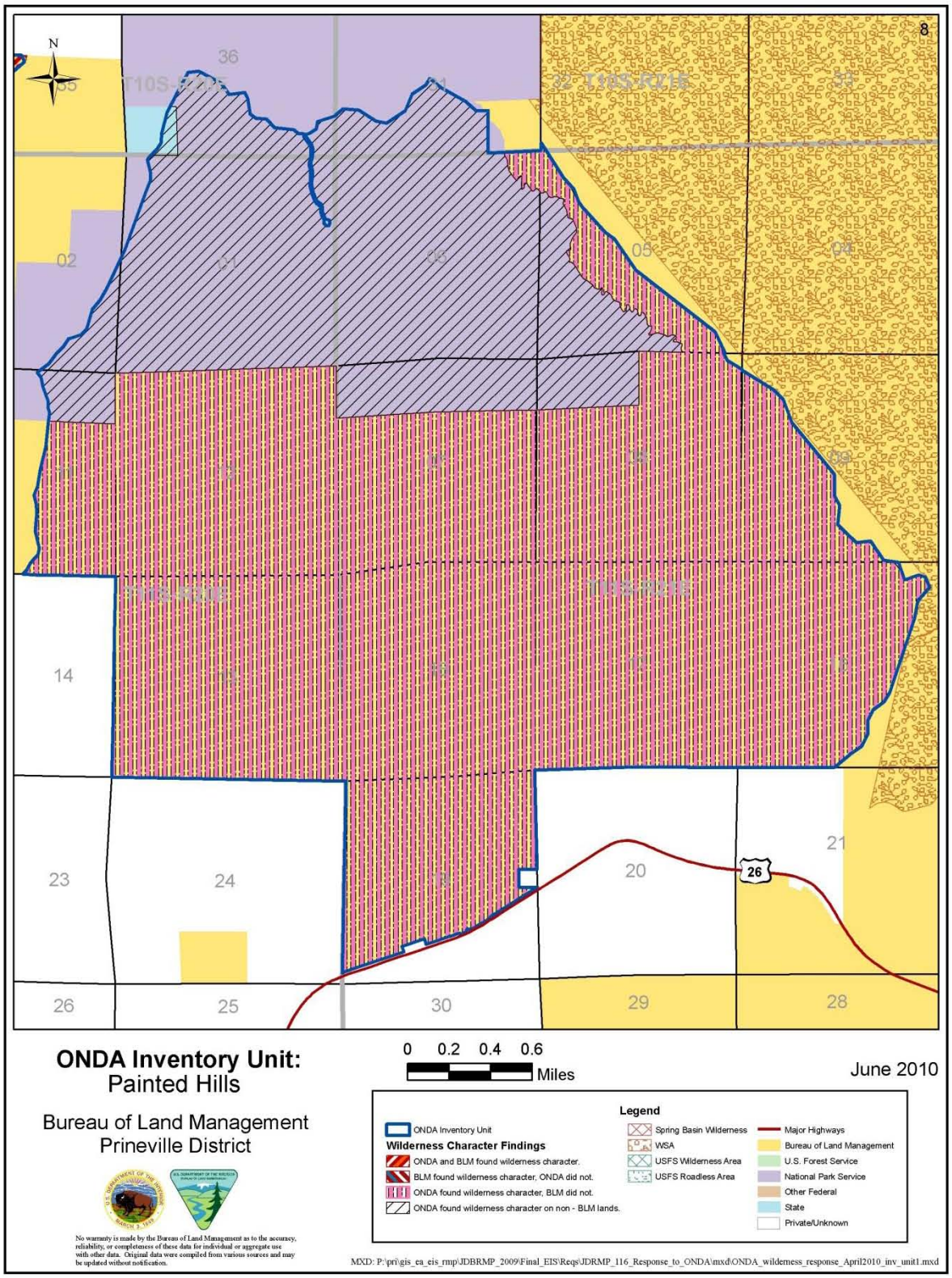
Outstanding Opportunities for Solitude: ONDA makes the case that since the land is adjacent to the WSA the opportunities for solitude are outstanding. The BLM inventory update did not evaluate Subunit A of the BLM North Pole Ridge WSA Additions Unit for solitude because BLM Route B was found to separate the inventory unit from the adjacent WSA, and the remaining lands were too small to be considered as wilderness on their own.

Outstanding Opportunities for Primitive Recreation: ONDA makes the case that since the land is adjacent to the WSA and associated with the John Day River the opportunities for primitive recreation are outstanding. The BLM inventory update did not evaluate Subunit A of the BLM North Pole Ridge WSA Additions Unit for primitive recreation because BLM Route B was found to separate the inventory unit from the adjacent WSA, and the remaining lands were too small to be considered as wilderness on their own.

Supplemental Features: The ONDA submission mentions the significance of the protection offered to the John Day River and its designation as an Oregon Scenic Waterway and a Wild and Scenic River. The ONDA submission also references the presence of California Bighorn Sheep. BLM agrees with ONDA's assessment of supplemental values.

Determination – The BLM inventory update found that the lands described as BLM Subunit A (North Pole Ridge WSA Additions Unit) do not have wilderness characteristics because these lands are separated from the adjacent WSA by a road and are too small to be considered as wilderness on their own.

8. Painted Hills Unit



The lands ONDA submitted as its Painted Hills Unit were inventoried in the BLM inventory update as the Sand Mountain Inventory Unit (OR 054-011). BLM did not inventory either the adjacent Oregon State lands or National Park Service (NPS) lands which ONDA did include in their inventory. BLM did consider the adjacent NPS acres, and the NPS management approach, for these acres during their inventory. Most of the lands within the inventory unit were acquired by the BLM in the 1992 Sutton Mountain Land Exchange, and inventoried for wilderness character as directed by Section 202 of FLMPA as part of the Sutton Mountain Acquired Lands Wilderness Inventory. The inventory found that the Sand Mountain Unit (OR-5-86) met all of the requirements for wilderness,

except the size requirement. The unit was eliminated from further wilderness review because at 4,790, it did not meet the minimum size criteria of 5,000 acres, and the adjacent NPS lands were not considered in the initial inventory process.

ONDA found BLM Subunits A, B, and C to have wilderness characteristics. The BLM inventory update found BLM Subunits A, B and C, to lack wilderness characteristics.

For the lands ONDA found to possess wilderness characteristics ONDA addressed the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation. ONDA's submission also states that the lands possess other significant natural resources, including spectacular geological formations valuable for their scenic qualities, and scientific and paleontological values, and in the Bridge Creek area, habitat for threatened steelhead and native redband trout, plus recreational and scenic opportunities. The BLM review and inventory update resulted in the following determination on the values ONDA identified as significant

Naturalness: ONDA identified a vehicle way (no # given) leading to the summit of Sergeant Butte, which BLM did not inventory and considers to be a primitive route that does not qualify as a road. ONDA also noted the evidence of human impacts on the summit of the Butte, which BLM identified as the remains of a communication site which has since been removed by BLM. ONDA identified a vehicle route (PH2) as being maintained for approximately one mile, and excluded the route from their unit. BLM identified the route as being a primitive route for access to a spring development which does not qualify as a road. The rest of the routes ONDA identified on public lands (PH2, PH3, PH3a, PH3b) as a network of OHV routes. BLM determined that all of these routes are user created and are not primitive routes, but only the result of cross-country recreational use or a result of contractor access to reach vegetation treatments, with the exception of PH3a, which is a primitive route which provides access to another spring development related to the range program. The BLM inventory update found that none of these routes qualify as roads. The BLM inventory update also identified a 444-acre vegetation treatment consisting of a juniper clear cut, which BLM believes has significantly reduced the natural condition of the unit to the point where Subunit A is not in a natural condition.

The BLM inventory update found that BLM Subunits B and C were separated from the rest of the unit by roads and a section of Bridge Creek that is developed with a number of improvements including adjacent irrigated agricultural fields, a power line, fences, a concrete water diversion structure, and stream restoration structures. The BLM inventory update found that even when combined with NPS acreages, BLM Subunits B and C do not meet the minimum size requirements for lands under wilderness review.

Outstanding Opportunities for Solitude: ONDA asserts that terrain and vegetation types offer visual and audible separation and that the area has a high expectation of solitude as a result. BLM staff also found outstanding opportunities for solitude in BLM Subunit A, but not for BLM Subunits B and C.

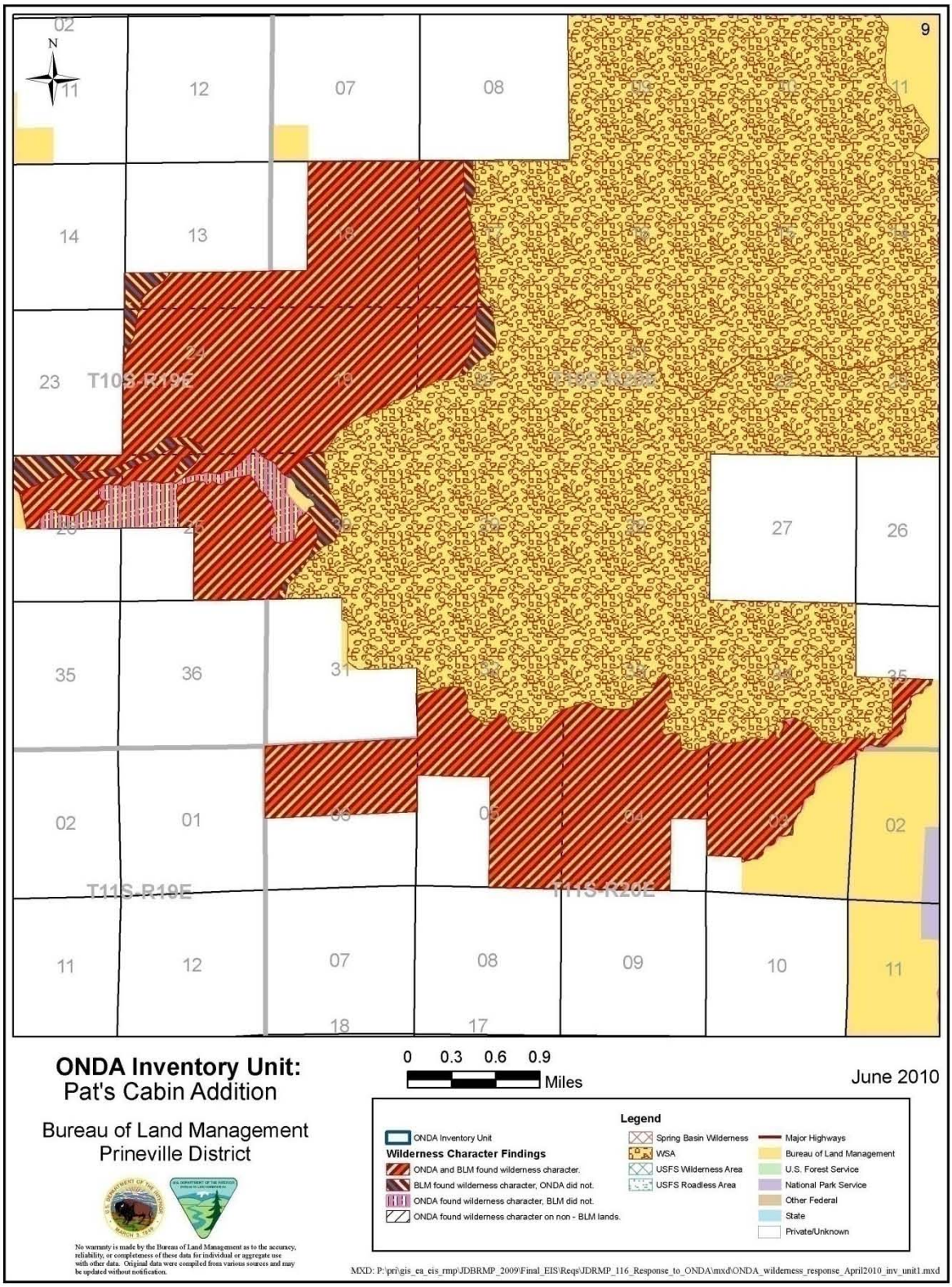
Outstanding Opportunities for Primitive Recreation: ONDA asserts that the area supports outstanding primitive recreation opportunities not just on the NPS lands but across administrative boundaries. BLM staff also found outstanding opportunities for primitive recreation in BLM Subunit A, but not for BLM Subunits B and C.

Supplemental Features: Scenic, paleontological, spawning habitat for steelhead and redband trout, and geology were all high resource values identified by ONDA as occurring on the unit. BLM staff agrees that these conditions exist across the artificial administrative boundaries.

Determination – The BLM inventory update found all three subunits of the BLM Sand Mountain Unit to lack wilderness characteristics.

The BLM inventory update found that the area was not in a natural condition due to the large vegetation treatment area located in the center of the unit, and the localized human impacts along Bridge Creek. When visiting the center of the unit where the vegetation treatment area is located, BLM believes that contrast in the appearance of the landscape between the vegetation treatment area and the rest of the unit would be obvious to the casual observer. However, BLM believes that through time the contrast between treated and untreated areas is expected to become less apparent to the casual observer, and the difference between the natural area and unnatural area will become less distinct. At the time of the inventory, BLM found the area to lack naturalness, and therefore to lack wilderness characteristics.

9. Pats Cabin Unit



The ONDA submission includes public lands adjacent to the Pat's Cabin WSA. The BLM assessed these lands during its inventory update as Pats Cabin WSA Addition Unit (OR 054-012), which included four BLM Subunits C, D, E and F, that are adjacent to the WSA on the north, west and southeast sides. ONDA did not evaluate the southeast side; otherwise the ONDA submission and the BLM inventory update units are the same.

Most of the lands within the BLM inventory update unit were acquired by the BLM in the 1992 Sutton Mountain Land Exchange, and some of these lands were inventoried for wilderness character as directed by Section 202 of FLMPA as part of the Sutton Mountain Acquired Lands Wilderness Inventory. The initial inventory found that 9,920 acres of the Pats Cabin Unit (5-85) met the requirements for wilderness, and this portion of the unit was designated as a Wilderness Study Area. The initial inventory excluded some areas from further wilderness review (2007 BLM Subunits B, C, D and F) because they were found to contain developments of various kinds, or were intersected by a road. An additional 4,036 acres of lands, most acquired in the Sutton Mountain Land Exchange, were have not been previously inventoried for wilderness characteristics and BLM inventoried these lands for the first time (2007 BLM Subunits A and E).

ONDA found that BLM Subunits A and B have wilderness characteristics. BLM also found that BLM Subunits A and B have wilderness characteristics for the majority of the subunits, with small exceptions. The BLM inventory update also found that BLM Subunits C and D have wilderness characteristics, but BLM Subunits E and F do not have wilderness characteristics, areas which ONDA did not address in their submission.

For the lands ONDA found to possess wilderness characteristics ONDA addressed the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation. ONDA's submission also states that the lands possess other significant natural resources, including world class paleontological values, scientific and ecological values, and wildlife habitat. The BLM review and inventory update resulted in the following determination on the values ONDA identified as significant

Naturalness: ONDA found route ccn3 to be a way, and the BLM inventory update agrees that this is a primitive route (BLM Route A) that does not qualify as a road. This route (BLM Route A) was first located in the initial 1994 inventory conducted by BLM and found at that time to be a primitive route that did not qualify as a road. ONDA evaluated route ccn3c as being a way, while BLM did not address it since it was found to be in the WSA. Maps supplied with ONDA's submission indicate a cherry-stem road in BLM Subunit A, but ONDA provides no description. The BLM inventory identified this route as a readily apparent juniper treatment area including an access route to the treatment area, and excluded the impacts of the route and the treatment area from the inventory unit. The BLM inventory update found the portion of BLM Subunit B west of Bear Creek to be in a natural condition, but found that portion of Subunit B east of Bear Creek to lack naturalness due to the presence of a past agricultural field, power line, and stream erosion control structures.

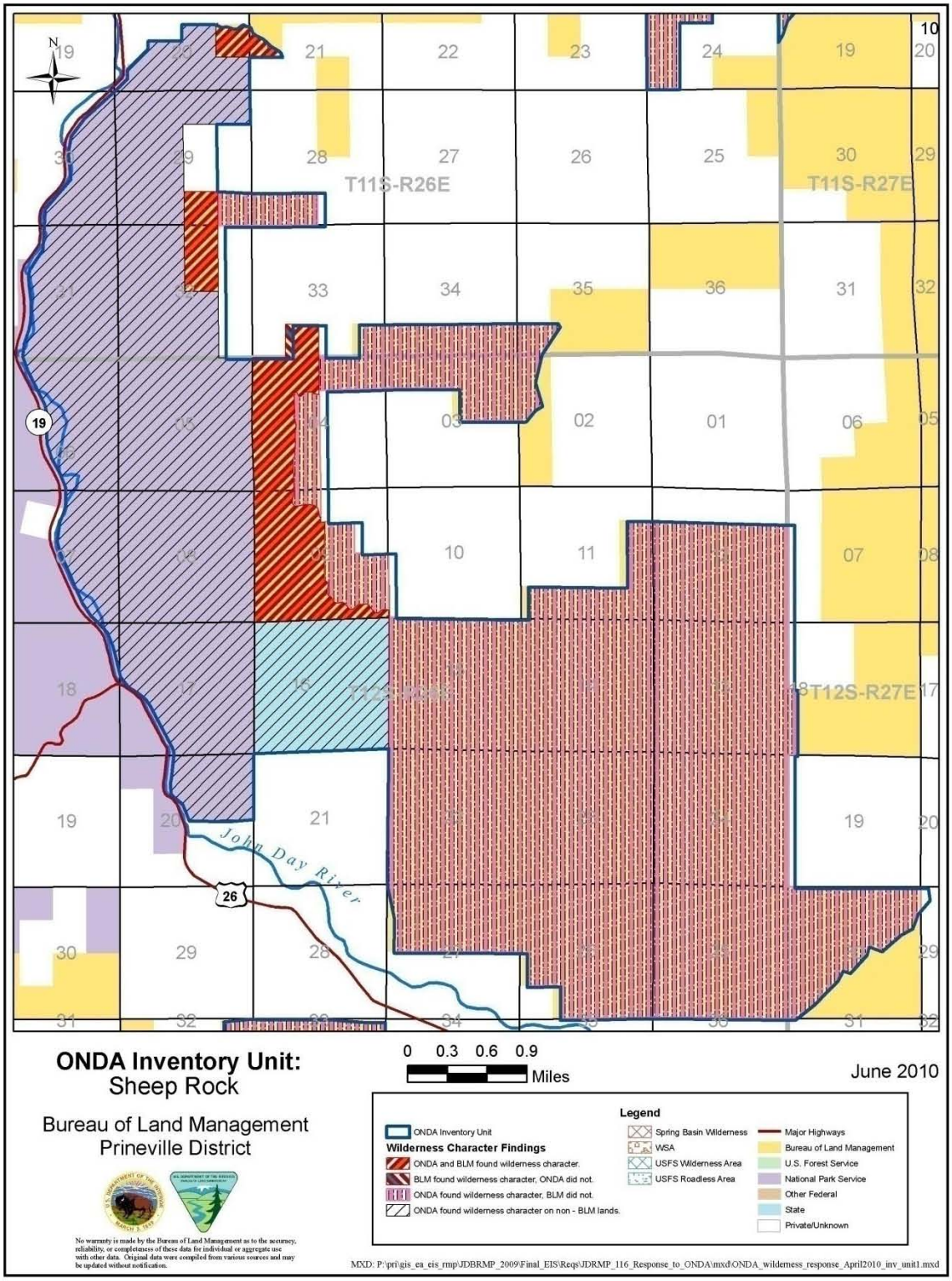
Outstanding Opportunities for Solitude: ONDA submits that the area topography, terrain and size, in association with the WSA, offer outstanding opportunity for solitude, to which BLM agrees.

Outstanding Opportunities for Primitive Recreation: ONDA submits that the area offers outstanding primitive recreational opportunity in association with the WSA, to which BLM agrees.

Supplemental Features: ONDA submits that the area has outstanding paleontological resources, which the BLM agrees with, as well as noting that its location contiguous with the WSA provides similar terrain, topography, habitat, and other supplemental values that are found in the adjacent WSA.

Determination –The BLM inventory update found the majority of the lands in BLM Subunits A and B to possess wilderness characteristics, except BLM excluded the vegetation treatments within BLM Subunit A since they are readily apparent to a casual observer, and also excluded the portion of BLM Subunit B east of Bear Creek because it was not in a natural condition. BLM also found Subunits C and D to possess wilderness characteristics.

10. Sheep Rock Unit



Lands identified by ONDA in their Sheep Rock Unit include Oregon State and National Park Service lands as well as public lands managed by the BLM. The BLM inventory update was conducted as the Rudio Mountain Unit (OR-054-027) and BLM Sheep Rock Unit (OR 054-026) which have different boundaries than the ONDA effort. The 1979Initial BLM Wilderness Inventory effort addressed the lands in 2007 BLM Subunits B and C as the Fossil Beds Unit (OR-05-11). The initial inventory found that the majority of the unit generally appeared to have been affected primarily by the forces of nature, but the unit was dropped from further consideration because it was found not to have outstanding opportunities for solitude or primitive recreation. The lands in 2007 BLM

Subunits A, D, E, and F were not previously inventoried because they were considered to be too small in size to meet wilderness review requirements.

The ONDA submission found lands having wilderness characteristics in BLM Subunits D, E and F of the BLM Sheep Rock Unit which include three small isolated BLM parcels adjacent to the NPS lands, and portions of BLM Subunit B and all of BLM Subunit C, both of the Rudio Mountain Unit, which includes a larger parcel southeast of the NPS lands.

For the lands ONDA found to possess wilderness characteristics, ONDA described the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation they found to be present. ONDA's submission also states that the lands possess other significant natural resources, including ecological values and world class paleontological values which are important to scientific research and are shared with the neighboring John Day Fossil Beds National Monument. The BLM review and inventory evaluated naturalness, the opportunity for solitude, and the opportunity for primitive unconfined recreation, as well as supplemental values, including the supplemental values identified by ONDA and made the following determinations:

Naturalness: ONDA and BLM both recognized that the Dick Creek county road bisects a small parcel of BLM land in BLM Subunit D of the BLM Sheep Rock Unit, isolating these lands and eliminating them from further consideration. ONDA and BLM both found that ONDA route SRf (BLM maintained Franks Creek Road) was a road, isolating a small parcel of BLM land in BLM Subunit D of the Rudio Mountain Unit, and eliminating it from further consideration. The ONDA inventory found routes SRe, SRg, SRr, and SRh to be ways, since they are blocked by private lands. The BLM inventory update agrees that most of these are primitive routes, with the exception that ONDA route SRe (BLM Route F in the Rudio Mountain Unit) and ONDA route SRr (BLM Route C in the Sheep Rock Unit) were found by BLM to qualify as roads.

ONDA and BLM are in agreement on the portion of BLM Subunits D and E, both of the BLM Sheep Rock Unit, which were found to be in a natural condition. The ONDA submission found all of BLM Subunit F of the BLM Sheep Rock Unit to be in a natural condition, but the BLM inventory update found portions of this subunit to be unnatural due to a road (BLM Route C of the BLM Sheep Rock Unit) which bisects the subunit and a juniper cut area. The ONDA submission found all of BLM Subunit C and portions of BLM Subunit B, both of the Rudio Mountain Unit, to be in a natural condition, but the BLM inventory update found this area to be unnatural due to a road (BLM Route F of the Rudio Mountain Unit) and multiple juniper cut areas.

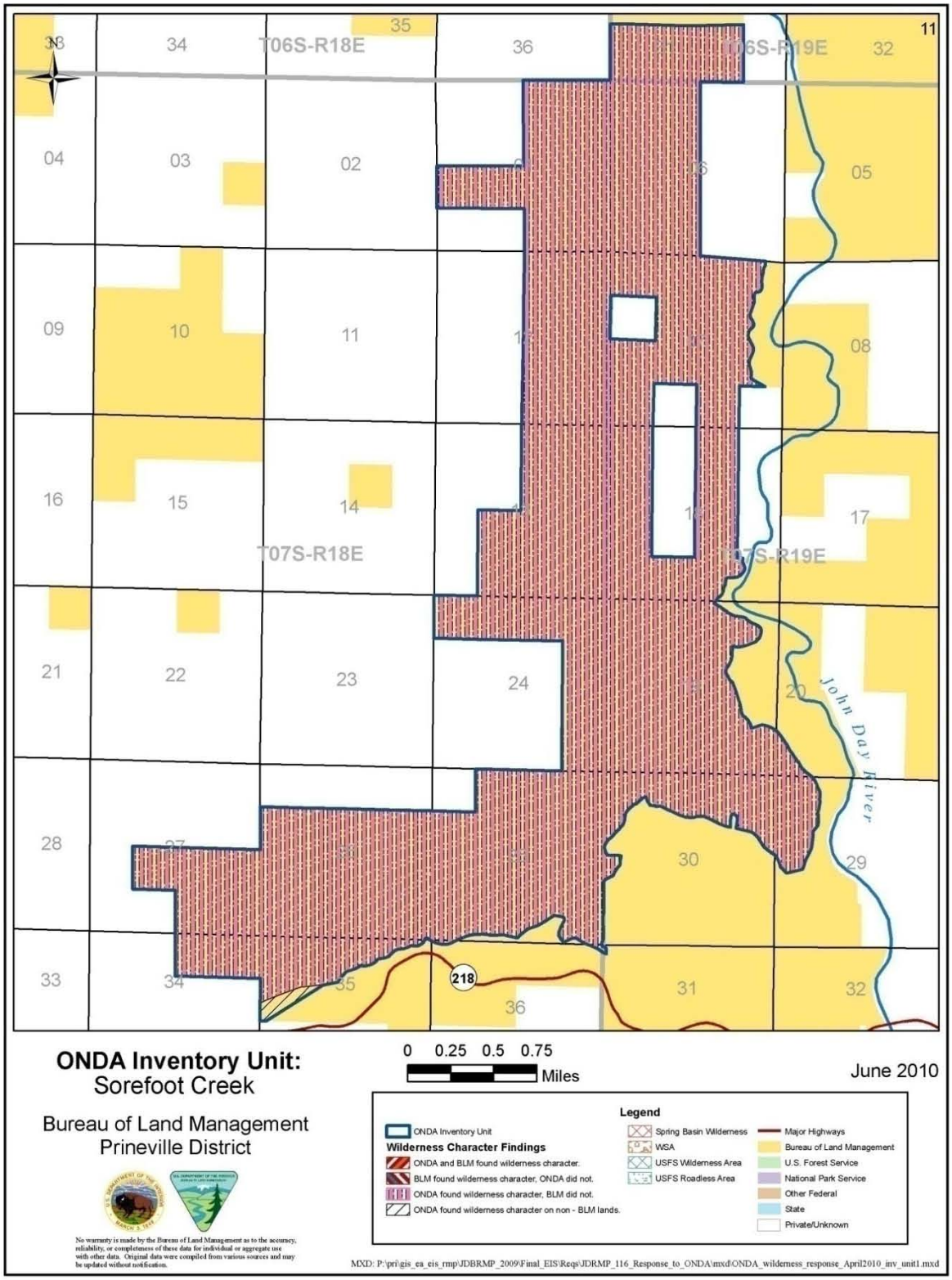
Outstanding Opportunities for Solitude: ONDA states that the unit has outstanding solitude due to its diversity in vegetation and topography, which offers screening and a sense of isolation. The BLM inventory update found that the lands immediately adjacent to the NPS lands in BLM Subunits D, E, and F of the BLM Sheep Rock Unit did have these values, but that not all of the lands did. BLM found that the long, narrow appendage portions of BLM Subunits E and F do not provide an outstanding opportunity for solitude. The BLM inventory update did not evaluate the opportunity for solitude in BLM Subunit C of the Rudio Mountain Unit because this subunit was found not to be in a natural condition.

Outstanding Opportunities for Primitive Recreation: ONDA states that the conditions found in the NPS lands are similar to those found in the adjacent public lands. The BLM inventory update found that portions of BLM Subunits D, E, and F of the BLM Sheep Rock Unit did share in the outstanding opportunities for primitive recreation found on the NPS lands, but other portions of these units did not. BLM found that the long, narrow appendages sticking out to the east of the NPS lands in BLM Subunits E and F of the BLM Sheep Rock Unit do not provide an outstanding opportunity for primitive, unconfined recreation. The BLM inventory update did not evaluate the opportunity for primitive recreation in BLM Subunit C of the Rudio Mountain Unit because this subunit was found not to be in a natural condition.

Supplemental Features: ONDA notes that the adjacent NPS lands were designated as a National Monument for its outstanding paleontological resources and stress that the BLM lands are similar geologically. BLM agrees with this assessment.

Determination: The BLM inventory update found portions of BLM Subunits D, E, and F of the BLM Sheep Rock Unit to possess wilderness character, but found that some portions of BLM Subunits E and F did not possess wilderness characteristics. The BLM inventory update found that BLM Subunit C, combined with portions of BLM Subunit B, did not possess wilderness characteristics.

11. Sorefoot Creek Unit



The lands submitted by ONDA as the Sorefoot Creek Unit were originally inventoried by BLM during the 1979 Initial Wilderness Inventory effort as part of the North Pole Ridge Unit (OR 5-79). A portion of the lands were established as a WSA, while the remainder was dropped from further consideration.

The ONDA unit differs from the BLM inventory update unit in that the BLM inventoried these lands as a portion of BLM Subunit B (Sorefoot) of the BLM North Pole Ridge WSA Addition Unit (OR 054-020), while the ONDA unit is a single stand-alone unit that is not adjacent to the WSA. ONDA also did not inventory some lands which BLM did.

ONDA found a portion of the BLM Subunit B (Sorefoot) to possess wilderness characteristics. The BLM inventory update found BLM Subunit B (Sorefoot) to lack wilderness characteristics.

For the lands ONDA found to possess wilderness characteristics ONDA addressed the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation. ONDA's submission also states that the lands possess other significant natural resources, including its proximity to the John Day River which is designated as a Wild and Scenic River and an Oregon Scenic Waterway, habitat for threatened steelhead in Sorefoot Creek, and scenic, ecological and geological values. The BLM review and inventory update resulted in the following determination on the values ONDA identified as significant

Naturalness: ONDA defines several routes as roads, including SF4, SF2a, SF2c, SF2d, SF3c, and SF 11a. The BLM classifies these routes as roads as well. ONDA classifies SF1, SF2a1, SF3d, SF 9, SF 10a, SF10b. SF10c, and SF 11b as ways. The BLM inventory update found ONDA route SF10a (BLM Route E) to qualify as a road. BLM notes that route SF3d is closed in the Clarno Travel Management Area Plan and does not classify it as a route at all, as its use is not authorized by BLM.

ONDA excludes several small areas that have visible human impacts in them, specifically evidence of past mining activity. BLM identified similar impacts in its inventory update.

ONDA identifies an existing power line in several photos, (KX 032 and KX 037) but does not discuss it in the narrative. BLM has identified the poser line as active ROW (OR 3471).

The BLM inventory update found that due to the presence of human activities in the form of roads, power lines and mining activity, the area is not in a natural condition.

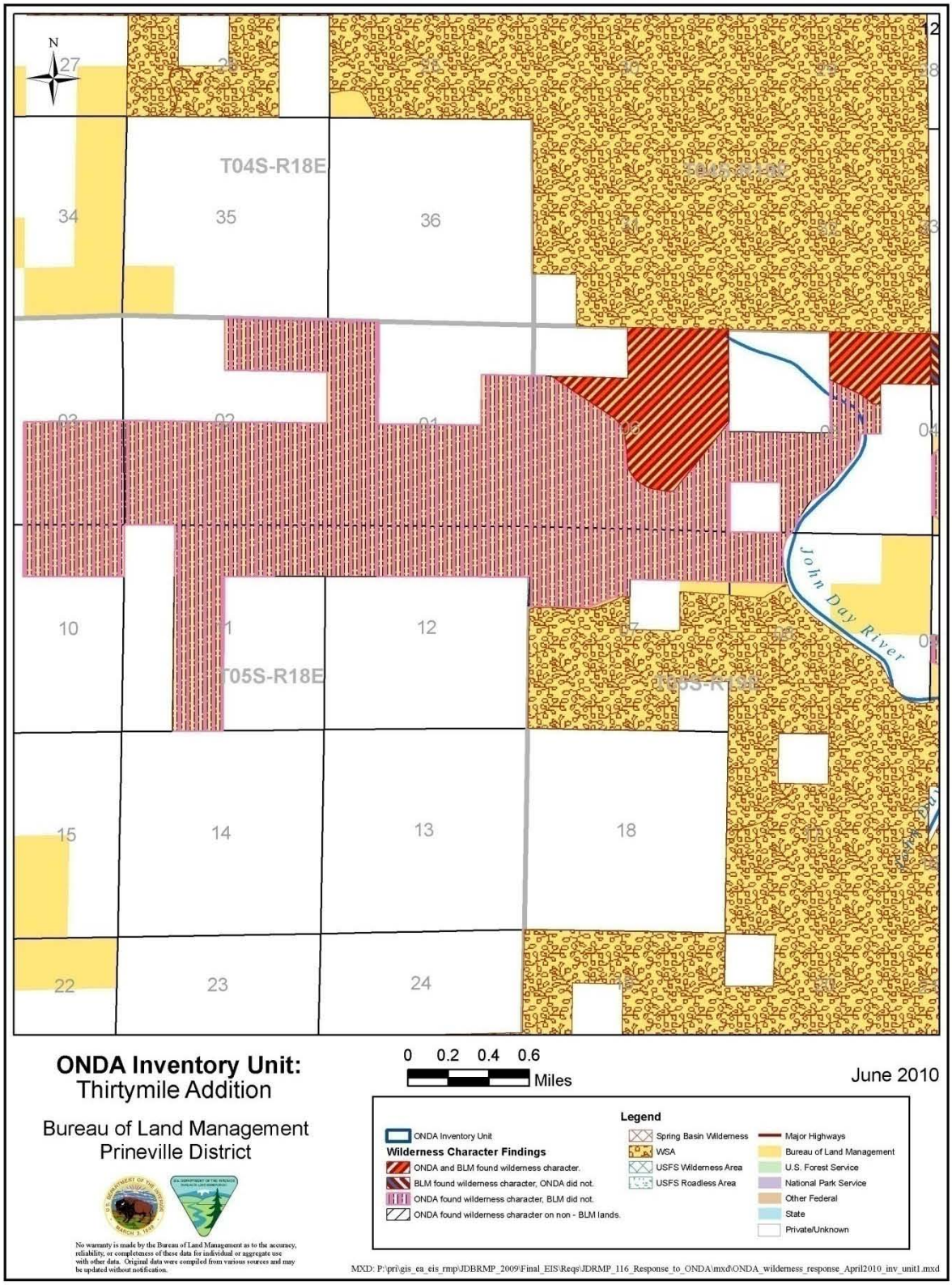
Outstanding Opportunities for Solitude: ONDA asserts that the length of the unit affects the users experience by allowing dispersion throughout the area. BLM found that the long, narrow, irregular shape and inholdings do not allow outstanding opportunities for solitude,

Outstanding Opportunities for Primitive Recreation: ONDA makes the case that several vehicle routes, currently closed to motorized use, are being used for non-motorized use. The BLM has no actual visitor use records for the area, but believes that use levels are low and that these routes identified by ONDA would provides good foot, bike and equestrian access routes. BLM found that the configuration of the unit, together with its topography and existence of a motorized route along its length, provide for recreation types other than primitive.

Supplemental Features: ONDA notes that Sorefoot Creek supports native redband trout and excellent spawning habitat for the threatened Steelhead. ONDA asserts that the area has significant visual value. The BLM inventory update did not evaluate the supplemental values of this inventory unit because BLM found they did not possess wilderness characteristics because they did not provide outstanding opportunities for solitude or primitive, unconfined recreation.

Determination: The BLM inventory update found Subunit B of the North Pole Ridge WSA Additions Unit to lack wilderness characteristics due to the presence of human development in the form of roads, power lines and mining activity, and because the narrow, irregular shape and inholdings result in opportunities for solitude and primitive recreation that are less than outstanding.

12. Thirtymile Creek Unit



The ONDA submission for Thirtymile Addition includes the lands inventoried by BLM as the Thirtymile WSA Addition (OR 054-048). The BLM initially inventoried these during the 1979 Initial Wilderness Inventory lands as part of the Thirtymile Unit (OR 5-1). The initial inventory determined that the lands lacked wilderness characteristics due to human improvements which bisected the area and due to the irregular pattern, and a lack of screening for solitude. In the BLM inventory update, BLM staff found that a portion of the lands possess wilderness characteristics, while a larger portion lacks wilderness characteristics.

ONDA found all of BLM Subunits A and B of BLM Thirtymile WSA Additions Unit, as well as additional surrounding public lands located between Thirtymile WSA and North Pole Ridge WSA to possess wilderness characteristics. The ONDA inventory did not depict the two natural gas pipelines that exist in the area. BLM did not inventory the area between the two pipelines because these lands are separated from the WSAs by the pipelines, and the lands are too small to be considered as wilderness on their own.

For the lands ONDA found to possess wilderness characteristics ONDA addressed the condition of the landscape in terms of its naturalness, and the outstanding opportunity for solitude and primitive recreation. ONDA's submission also states that the lands possess other significant natural resources, including the John Day River which is designated as a Wild and Scenic River and an Oregon Scenic Waterway, Pine Hollow Creek which provides critical spawning habitat for threatened steelhead, ecological and riparian values. The BLM review and inventory update resulted in the following determination on the values ONDA identified as significant

Naturalness: The ONDA route identified as Tc1 was determined by ONDA to be a way. BLM concurs that this route does not qualify as a road. The pipeline ONDA identified is an active BLM ROW. ONDA notes the pipeline appears to be in the North Pole Ridge WSA for a distance. The BLM believes that this is a mapping error and that the north boundary of the North Pole Ridge WSA is set along the active Pipeline ROW. (A notation is made in the BLM WSA Case File.) ONDA did not identify the northern pipeline ROW, which BLM identified. The existing land use plan identifies the lands in the area where the two pipelines are located as a utility corridor.

The BLM inventory update found BLM Subunits A and B, which are located adjacent to the WSA, but not separated from the WSA by a pipeline, to be in a natural condition.

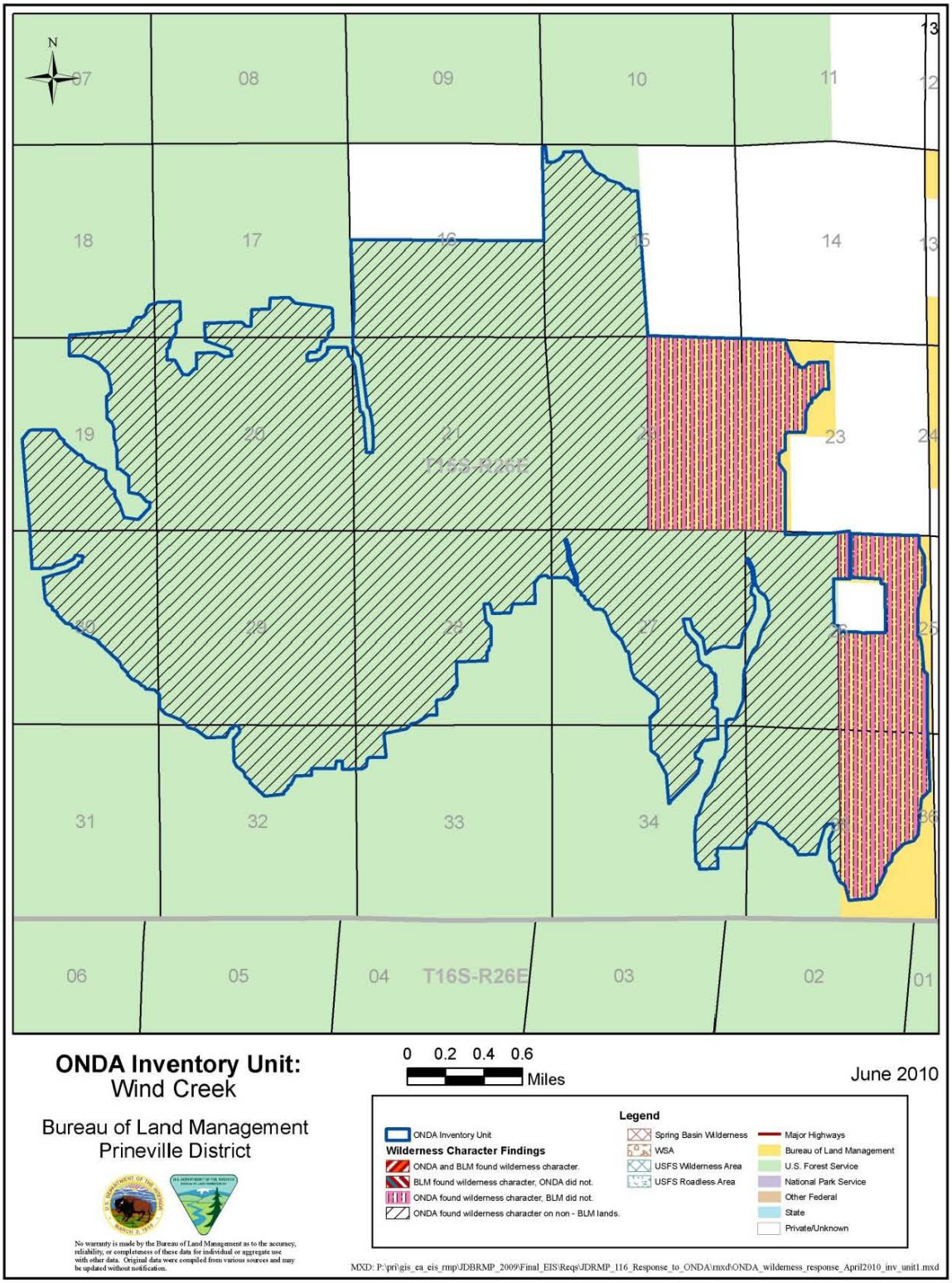
Outstanding Opportunities for Primitive Recreation: ONDA stresses that the lands offer outstanding primitive recreational opportunities since the lands are sandwiched between two WSAs. BLM believes that only the lands immediately adjacent to the WSA (BLM Subunits A and B) possess the same characteristics and that the pipelines separate the rest of the lands from the WSAs.

Outstanding Opportunities for solitude: ONDA stresses that the lands offer outstanding opportunities for solitude since the lands are sandwiched between two WSAs. BLM believes that only the lands immediately adjacent to the WSA (BLM Subunits A and B) possess the same characteristics and that the pipelines separate the rest of the lands from the WSAs.

Supplemental Features: ONDA references several ecological values, including the presence of critical spawning habitat for threatened steelhead trout and the presence of reintroduced California Bighorn Sheep. The initial BLM inventory found that the lands had supplemental features (Scenery) and the BLM inventory update makes the same finding. The BLM manages a portion of these lands as Visual Resource Management (VRM) Class II, including the lands which BLM found to have wilderness characteristics.

Determination – The BLM inventory update found BLM Subunits A and B, located north of the pipeline and adjacent to Thirtymile WSA to possess wilderness characteristics. These two subunits are separated from each other by a parcel of private land. The remainder of the area was not included in BLM's inventory unit as it is not adjacent to either WSA, and is too small to be considered as wilderness on its own.

13. Wind Creek Unit



The majority of the lands submitted by ONDA as the Wind Creek Unit are located on USFS lands, with only two small parcels of BLM lands. ONDA asserts that these parcels are contiguous with adjacent USFS Roadless lands. The BLM initially conducted a wilderness inventory on these lands (Frazier Creek OR-054-047) in the current inventory update effort, but determined that the lands are not adjacent to the USFS Roadless Area, and are too small.

Naturalness: The ONDA inventory identifies only routes WCj, WCf and WCf2 as being on public lands. ONDA classifies WCj as a way, WCf as a road and WCF2 as a way. ONDA notes that the rest of the unit is in a natural condition. BLM did not evaluate the

naturalness of the area, as the BLM inventory update found that the lands are not adjacent to the USFS and are too small to be considered as wilderness on their own.

Outstanding Opportunities for solitude: ONDA states that the lands posses outstanding opportunities for solitude, due to its topography and vegetation screening. BLM did not evaluate the opportunity for solitude, as the BLM inventory update found that the lands are not adjacent to the USFS and are too small to be considered as wilderness on their own.

Outstanding Opportunities for Primitive Recreation: ONDA states that the lands posses outstanding primitive recreational opportunities, due to its topography and vegetation screening. BLM did not evaluate the opportunity for primitive recreation, as the BLM inventory update found that the lands are not adjacent to the USFS and are too small to be considered as wilderness on their own.

Outstanding Opportunities for solitude: ONDA states that the lands posses outstanding opportunities for solitude, due to its topography and vegetation screening. BLM did not evaluate the opportunity for solitude, as the BLM inventory update found that the lands are not adjacent to the USFS and are too small to be considered as wilderness on their own.

Supplemental Features: ONDA references the spawning habitat for threatened steelhead. They also identify a population of native redband trout and critical winter deer habitat. BLM did not evaluate supplemental values, as the BLM inventory update found that the lands are not adjacent to the USFS and are too small to be considered as wilderness on their own.

Determination - BLM determined that the two public land parcels are not adjacent to a USFS Roadless Area, and did not meet the size criteria or any of the exceptions, thus dropped the lands from further evaluation.