



Wilderness Characteristics Inventory Review

A Review of Vale and Lakeview District
Conformance with Established Procedures for
Maintaining the Inventory of Lands with Wilderness
Characteristics

Final Report—December 18, 2015

The purpose of this review is to determine the degree of compliance by both the Vale and Lakeview BLM Districts with wilderness characteristics inventory guidance found in BLM Manual 6310 "Conducting Wilderness Characteristics Inventory on BLM Lands" and the earlier draft Oregon Handbook H-6300-1 "Wilderness Inventory Maintenance in BLM Oregon/Washington."

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Oregon BLM Districts have been conducting inventories to determine the presence or absence of lands with wilderness characteristics. This report focuses on two of these, the Vale and Lakeview Districts. A review of the inventory documentation conducted by both Districts was conducted, and was supplemented by field reviews in both Districts. This inventory review was requested by the Oregon State Director, initiated in May 2015, and completed in July 2015. The review was conducted by David Harmon, a retired BLM WO Wilderness Program Leader working on the project as a rehired annuitant for the Oregon State Office, and by Dave Mermejo, the Nevada State Office Wilderness Program Leader. Throughout this report, these two individuals will be referred to as “the reviewers.”

EXECUTIVE SUMMARY

The BLM Oregon State Office requested a comprehensive review of the level of compliance with wilderness characteristics inventory policy and direction in the Vale District and Lakeview District. A two-person review team examined inventory Form 1 and Form 2 along with photo documentation and wilderness-road inventory forms for approximately 30% of the inventory units in each District. Information supplied by the Oregon Natural Desert Association (ONDA) was also reviewed.

Wilderness characteristic inventory files were randomly selected by each team member. This manner of selection allowed for a non-

A review of the Vale and Lakeview District wilderness characteristics inventory procedures and findings was conducted at the request of the Oregon State Director. The two reviewers determined that several procedures could be conducted that would provide better supporting documentation to future inventory analyses. These procedures are the result of lessons learned since these inventories were first conducted. There are no outstanding or grievous errors or deviation from past wilderness inventory procedures that would require any of these inventories to be voided. Inventory for wilderness characteristics will continue to be improved upon over time.

biased selection of areas found to possess wilderness characteristics and areas found not possessing wilderness characteristics.

Findings and Recommendations:

Inventory units in both districts were reviewed for compliance with BLM policy and direction for conducting wilderness characteristics inventories.

Inventory Documentation

Form 1: Review of existing inventory information:

The districts provided the required information identifying previous inventories and findings for both BLM initiated inventory and citizen proposed inventory information. There was some question on item 1C of the form. This question addressed “map name and number.” Current manual direction does not detail how to complete this question. Both districts tended to answer this question in the same manner. **Recommendation:** That BLM provide clarifying guidance on how to reference map documentation used in the baseline inventory.

Form 2: Wilderness characteristics analysis:

Size: Both districts analyzed the size criteria similarly, adequately identifying size requirements. However, in some cases the analysis offered a distinction between an area that is unnatural in appearance and an area that is natural, but further analysis on whether the area still meets the size criterion after removal of the unnatural acreage was not forthcoming either on the map or within the narrative. In such cases, when the remaining natural area is larger than 5,000 acres, inventory for the remaining wilderness characteristics should continue. **Recommendation:** That BLM provide clarifying guidance that this step is taken when an excludable portion of the inventory unit does not meet the naturalness criterion.

Naturalness: Both districts provided good narrative analysis on the question of naturalness, comparing earlier inventories and citizen proposed findings with BLM analysis. However, the narrative in many cases could benefit by including more photographic documentation to illustrate clearly the conditions relating to naturalness. This can be essential especially when a finding of a lack of naturalness is based upon human intrusions. **Recommendation:** In future inventory efforts, photographs should be taken and included in the file to illustrate the conditions of naturalness, or a lack of naturalness.

Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation:

The analysis provided by both districts regarding solitude is fairly consistent. Manual direction tends to stress topographic relief and vegetative screening as essential to establishing a sense of solitude. In a rather discreet way, the manual also provides some reference to distance (size and shape of unit as relates to distance from edges and other users) as a means of determining solitude and, with the manner in which size is addressed, there is an assumption that the reader fully understands that this also means distance. This indirect approach has led to a

misinterpretation within manual direction which is evident in some determinations which seem to be based solely on topographic relief and vegetative screening.

Recommendation: The inclusion of distance specifically and clearly alongside consideration of unit configuration, topographic relief, and vegetative screening to measure solitude opportunities should be addressed as lessons learned in future guidance.

Supplemental Values: While supplemental values are not a necessity to determine the presence of wilderness characteristics, they become, when wilderness characteristics are found to be present, another wilderness value that should not be overlooked or taken lightly. Where supplemental values were present, both districts usually provided a narrative analysis of what those values were. As with naturalness and solitude, photo documentation would provide better support to the analysis. Additionally, some supplemental values may support activities that would qualify as outstanding primitive recreation opportunities. **Recommendation:** While conducting the analysis, a question that should be addressed along with *“are supplemental values present”* is *“does the presence of certain supplemental values also provide a clue to potentially outstanding opportunities for primitive and unconfined recreation?”* During the review of the inventory files, in some cases it was shown that where the initial determination indicated a lack of outstanding primitive and unconfined recreation, the presence of certain supplemental values (e.g., lava tubes, trophy mule deer populations) could support outstanding primitive recreation opportunities.

Appendix C-Route Analysis: One of the critical factors to determine whether a route is a road for wilderness characteristics inventory purposes is that in order to be considered a road which would form part of the inventory unit boundary, it must be maintained to ensure relatively regular and continuous use (Route Analysis Form III. B). In the event that there is no evidence or documentation of maintenance using hand tools or machinery, the maintenance test can still be met if the following question is checked “Yes” on the form: “If the route segment is in good condition, but there is no evidence of maintenance, would mechanical maintenance with hand tools or machines be approved by BLM to meet the purpose(s) of the route in the event this route became impassable?” An affirmative answer to this question sometimes makes the difference in the route being classified as a wilderness inventory road. Where this question has been answered “yes,” managers signing the Summary of Analysis page in Appendix B on the inventory form need to realize that by doing so, they are affirming that the route has sufficiently high priority to support a reasonable expectation that timely repairs would ensure its relatively regular and continuous use. **Recommendation:** The importance of this consideration and its ramifications on future maintenance efforts should be emphasized in future inventory efforts.

Changed Conditions: There was general understanding that when the inventory determined that conditions had changed since the original baseline inventory, such as when a seeding with drill rows had become more natural over time due to encroachment of sagebrush or other vegetation, the inventory finding could change (e.g. the unit now meets the naturalness criterion when it did not before). There was less understanding that it can also be appropriate to change

an inventory finding when it appears that the baseline inventory did not accurately describe the character of the unit (*e.g.* an area may be more topographically diverse, influencing opportunities for solitude, than described in the earlier inventory). The original inventory was completed over a large area during a two-year time frame, and sometimes the inventory descriptions were somewhat cryptic. **Recommendation:** Guidance should be issued that would clarify this point.

Consideration of Citizen Input: In general, both Districts did a good job of referencing the input they received from the ONDA, explaining how they considered the information, and whether or not it affected the decision and why. In the majority of cases, BLM did not agree with the wilderness inventory road/route findings of ONDA, frequently documenting that a route met the inventory road definition, when ONDA believed it to be a “way” (not a road). In some cases, BLM agreed with ONDA that a road that had been inventoried in the baseline inventory had changed in character, and is now a route that does not meet the wilderness inventory road definition. **Recommendation:** Continue to consider citizen input as an important part of the inventory maintenance work, and fully evaluate and explain how citizen input influenced, or did not influence, the final inventory finding for affected inventory units.

Summary:

Based upon the conditions that the districts were operating under; which was during a time when clear manual direction on conducting wilderness characteristics inventories was not available; the inventory analysis is very much in line with current 6310 manual direction. There are no outstanding or grievous errors or deviation from past wilderness inventory procedures that would require these inventories to be voided. There are several procedures that could be conducted when the inventories are maintained and updated that would provide supporting documentation to the inventory analysis such as additional photographic documentation. These procedures, however, are the result of lessons learned since these inventories were conducted. Inventorying for wilderness characteristics is an ongoing process that will continue to be improved upon as time passes and technology and related guidance improve.

OVERVIEW OF THE WILDERNESS INVENTORY PROCESS

When the baseline wilderness inventory was conducted Bureau-wide (excluding Alaska) in 1978-1980, nearly every BLM District employed a wilderness inventory team. At the time, Director Frank Greg referred to the project as “the world’s largest wilderness inventory ever.” Much was learned by the individuals conducting the field work as they gained experience over the intense two-year inventory period. Very little, and usually no, wilderness characteristics inventory work was conducted on the Districts throughout the Bureau between 1980 and 2000, and many of the employees experienced in wilderness inventory work left the Bureau during that time. Wilderness characteristics inventory efforts began again in some states between 2000-2003, but then came to a halt after litigation in Utah forced a rescission of the nation-wide guidance that had been issued in 2003.

The wilderness characteristics inventories conducted by Vale and Lakeview Districts used Oregon’s draft H-6300-1 Handbook. There was no national manual guidance available when these inventory updates were conducted. Washington manual guidance was later issued in March 2012 (6310 Manual), and the Oregon draft handbook guidance used for these inventories was nearly identical to that which was issued out of the Washington Office (*i.e.* wilderness characteristics criteria and definitions remained the same from the Oregon draft to the WO final manual).

It is very important to note that the wilderness characteristics inventory maintenance process continues to evolve Bureau-wide over time. All offices will gain more experience in conducting the inventories as time passes, improving the inventory process. There are “lessons learned” that have recently been circulated among BLM offices that illustrate this point. These lessons learned were compiled and circulated to state office wilderness program leaders and are an informal collection of ways to improve inventory work, consistent with the present general manual guidance (6310 Manual).

The reviewers used the existing guidance documents to conduct their review, and they also referenced actions that could be taken to strengthen future inventory reports conducted for wilderness characteristics inventory maintenance activities.

METHODOLOGY OF THE REVIEW

A random sample of inventory units for lands with wilderness characteristics from both Districts was identified. The wilderness characteristics inventory reports, associated route analysis forms, and photographs for these units were studied by the reviewers. The BLM-produced material was studied as well as the related narratives and photographs supplied by the ONDA to the District offices. The

inventory reports selected consisted of those for 62 inventory units within 6 geographic management areas in the Vale District and 67 inventory units in 18 wilderness characteristics evaluation areas on the Lakeview District. This amounts to approximately a 30% sample of total inventory units on both Districts. Findings from this review were documented on a standard "Wilderness Characteristics Inventory Review Checklist" for each inventory project.

A field review of selected units from the sample was then conducted on each District. District personnel guided the reviewers to the field where a better understanding of the field conditions for the selected inventory units was gained. Important information regarding how the inventories were conducted and how the findings were derived was received by this "ground-truthing" part of the review. The reviewers greatly appreciate the excellent assistance from the Vale and Lakeview District personnel who provided invaluable help in both the collection of the written and photographic material for review, and in the field time expended in assisting with visiting the selected inventory units.

VALE and LAKEVIEW DISTRICT WILDERNESS INVENTORY REVIEW

Both reviewers used a “Wilderness Characteristics Review Checklist” form to record important written and photographic information found in each inventory report. ONDA’s reports and photographs were also reviewed for selected units.

VALE DISTRICT – Review of Wilderness Characteristics Unit Inventories

Appendix A summarizes the noteworthy findings from the joint review of the 62 inventory units. Appendix B summarizes the review of 11 selected areas that were visited over a three-day period in the field.

General Findings of Inventory Reports– Vale District

Photographs – Photographs were usually only taken during the analysis of routes to help determine if they did or did not meet the wilderness inventory road definition. Reports that did not have a route analysis had no photographs in the report. Photographs were generally very good quality, and in most cases their documentation was satisfactory. They helped to display the character of the route in question. Landscape features of each inventory unit were only captured in the background or periphery of the photograph of the specific route in question. Photos were also needed to help support the narratives describing naturalness and solitude, but these were generally not included.

Discussions of the presence or absence of vegetative and topographic screening as they influence opportunities for solitude would be much stronger if photos were included to illustrate the message of each solitude narrative. When describing rugged topography that contributes to outstanding solitude, some photos of mountains, hills or canyons would greatly strengthen the inventory narrative supporting the finding of outstanding opportunities for solitude. Likewise, when a lack of topographic and vegetative screening contributed to a finding that solitude opportunities were not outstanding, some photographs of the flat, relatively unvegetated landscape would help illustrate the point. When flat, relatively unvegetated areas are found to have outstanding opportunities for solitude because of the large size of the unit, a photograph depicting the great distance, or vastness of the landscape would be useful.

In the naturalness narratives, photographs illustrating the apparent naturalness of a feature described in the narrative, or the relative impact on naturalness that the feature or features make, could have been included to bolster the findings. This would provide the reader with a better understanding of

what visual impact a described feature makes on the landscape. Likewise, photographs would help support narratives that conclude there is little or no impact on naturalness from past human activities.

The inventory directives require that photographs be included in the inventory documentation, but there is no specific direction about what aspect of the inventory the photos should illustrate. In the future, it would be very helpful to expand the photographic files beyond route analysis to illustrate the narratives on naturalness, solitude, and when appropriate, primitive and unconfined recreation and supplemental values.

Primitive and Unconfined Recreation- Primitive and unconfined recreational opportunities in each inventory unit were properly described and summarized, with a clear statement of why an area qualified as having outstanding opportunities for a variety of activities or a single high value activity, or did not qualify, because of a lack of these opportunities. When bighorn sheep hunting is available, it was usually identified as an outstanding primitive recreational activity, and is noted in the rationale as qualifying for outstanding opportunities. This is appropriate, but is not always consistently applied when bighorn sheep habitat is present (*e.g.* McIntyre Ridge OR 034-014, Board Corral Mountain OR 034-016).

Supplemental Value narratives sometimes identify values that could also apply to primitive and unconfined recreation opportunities. While certain supplemental values may be mentioned, their ties to potential primitive and unconfined recreation opportunities often were not mentioned.

Solitude- Solitude opportunities were generally described adequately, with descriptions of each unit's size, configuration, and vegetative and topographic screening for their effect on opportunities for solitude. The narrative usually supported the finding of either outstanding or a lack of outstanding opportunities for solitude. The narratives sometimes do not adequately address the effect of large size (distance) as an element that could support the presence of solitude (*e.g.* Deer Butte OR 0346-053, Bogus Rim OR 036-059). Distance is a function of unit size and shape, and can be a parameter for consideration in determining solitude opportunities. Although this factor is not specifically described in the guidance, in the future it can be used to help describe solitude opportunities.

Naturalness- The District generally did a good job identifying any unnatural portion, deleting it and continuing with the analysis of outstanding opportunities on the remainder of the natural portion (*e.g.* McIntyre Ridge OR 034-014, Three Fingers Rock South OR 034-055.) One unit having this situation correctly deleted the unnatural portion, but failed to identify the acreage remaining in the natural portion that was found to have wilderness characteristics (Board Corral Mountain OR 034-016.) This created a problem in that the boundary of the area that was found to have wilderness characteristics was never identified.

Citizen Information- In general, in nearly all of their reports, the District did a commendable job in explaining what ONDA provided regarding wilderness characteristics and the status of routes, and then explaining their response to the public information received. The key points raised by ONDA were usually summarized, and then methodically documented in each appropriate wilderness characteristics inventory section regarding how the information was considered, and how it either did or did not influence the decision. Sometimes the District agreed with ONDA, and sometimes not, but they always explained how and why they reached their decision.

Route Analysis- The District reviewed routes that were an issue, and did a good job of filling out the route analysis forms, covering with sufficient detail all of the required considerations to make the determination of wilderness inventory road, or no road. Photo documentation focused on each route analyzed to provide a clear picture of the route and good support for the findings. The approach used by the Vale District seems to have been to make the inventory decision on the route without reference or reliance on the Facility Asset Management System (FAMS) classification, which in most cases leads to a realistic finding regarding a wilderness inventory road vs. primitive route. Occasionally, a route finding that was critical to the decision regarding wilderness characteristics was not included in the inventory documentation, an oversight that should be corrected in future maintenance efforts (*e.g.* Steamboat Ridge OR 034-058, Spring Mountain OR034-094). Routes that the entire inventory team could agree on were not documented on a route analysis form. This resulted in a number of unit boundary roads not having documentation confirming that they form part of the unit boundary. In the future, it is recommended that all inventory unit boundary roads have a route documentation form on file confirming that they meet the wilderness inventory road definition.

One of the critical factors to determine whether a route is a road for wilderness characteristics inventory purposes is that in order to be considered a road which would form part of the inventory unit boundary, it must be maintained to ensure relatively regular and continuous use (Route Analysis Form III. B). In the event that there is no evidence or documentation of maintenance using hand tools or machinery, the maintenance test can still be met if the following question is checked "Yes" on the form: "If the route segment is in good condition, but there is no evidence of maintenance, would mechanical maintenance with hand tools or machines be approved by BLM to meet the purpose(s) of the route in the event this route became impassable?" An affirmative answer to this question sometimes makes the difference in the route being classified as a wilderness inventory road. Where this question has been answered "yes," managers signing the Summary of Analysis page in Appendix B on the inventory form need to realize that by doing so, they are affirming that the route has sufficiently high priority to support a reasonable expectation that timely repairs would ensure its relatively regular and continuous use.

Areas Contiguous with WSAs – Some units that were previously separated by roads from WSAs, were now found to be contiguous with WSAs because what once was a wilderness inventory road has now been determined to be a primitive route. The solitude and primitive and unconfined recreation discussions for some of these areas sometimes are written as if the units were still separated from the WSA, and appear to conclude that while they don't have outstanding opportunities on their own, they do when considered in conjunction with the adjoining WSA. Since they are now a part of the same roadless area that forms the WSA, they share the same outstanding opportunities identified for the WSA. There is no point in preparing a narrative that could be interpreted to indicate that the unit still is separated from the WSA. In the future, this type of confusion should be avoided by dropping the stand-alone approach to the narrative (e.g. Clark Butte Contiguous OR 036-057).

Overlapping Boundaries - Several inventory units extended over the Idaho state line, continuing onto BLM land in the Boise District. Vale did an adequate job inventorying their side of the line, but when the inventory was conducted, Idaho was apparently not ready to participate. In one of the units, Vale was forced to confine its findings to the Oregon side in documenting the presence of wilderness characteristics. Later, Boise District completed their side of the line and found no wilderness characteristics. A memo to the files was included that logically explained why the findings were different in the two states, and the results appear to be correct. It would have been better for Idaho to have committed the resources at the time to participate with Vale when the field inventory was conducted (see Spanish Charlie Basin OR-034-092). Several other units were handled the same way, with the exception that both Districts concurred that no wilderness characteristics were present on either side of the line (see McBride Creek OR-034-093, Dry Creek OR034-111, Coal Mine Basin OR034-112.)

Outside Sights and Sounds - The 6310 Manual addresses the consideration of outside human impacts on Naturalness only in exceptional cases when a major outside impact exists. The Oregon H-6300-1 draft guidance used the exact same language. While the Oregon guidance was silent on this topic under the Solitude discussion, the 6310 Manual, under the Solitude guidance states: "Only consider the impacts of sights and sounds from outside the inventory area on the opportunity for solitude if these impacts are pervasive and omnipresent."

Vale occasionally considered the impact of outside sights and sounds on solitude opportunities, and seemed to do so properly in the case of the "overpowering" influence of highway traffic on a boundary road which limited solitude opportunities (e.g. Wilson Creek OR034-097).

LAKEVIEW DISTRICT – Review of Wilderness Characteristics Unit Inventories

Appendix C summarizes the noteworthy findings from the joint review of the 67 inventory units. Appendix D summarizes the review of 13 selected areas that were visited over a two-day period in the field.

General Findings of Inventory Reports– Lakeview District

Photographs – Photographs were usually only taken by BLM staff of routes as they were being analyzed to help determine if they did or did not meet the wilderness inventory road definition. Photographs were also taken of any water developments or range features located adjacent to the road. Photographs of the landscape features of each inventory unit were usually only captured in the background or periphery of the route photograph. Photos are also needed to help support the narratives describing naturalness and solitude, but were generally not included. Discussions of the presence or absence of vegetative and topographic screening as they influence opportunities for solitude would be much stronger if photos were included to illustrate the narratives. When describing rugged topography that contributes to outstanding solitude, some photos of the mountains, hills or canyons would greatly strengthen the inventory narrative for outstanding opportunities for solitude. Likewise, when a lack of topographic and vegetative screening contributed to a finding that solitude opportunities were not outstanding, some photographs of the flat, unvegetated landscape would help illustrate the point. When flat, relatively unvegetated areas are found to have outstanding opportunities for solitude because of the large size of the unit, a photograph depicting the great distance, or vastness, of the landscape would be helpful.

In the naturalness narratives, photographs illustrating the apparent naturalness of a feature described in the narrative, or the relative impact on naturalness that the feature or features make should have been included to bolster the findings. This would provide the reader with a better understanding of what visual impact a described feature makes on the landscape. Likewise, photographs would help support narratives that conclude there is little or no impact on naturalness from past human activities.

The inventory directives require that photographs be included in the inventory documentation, but there is no specific direction about what aspect of the inventory the photos should illustrate. In the future, it would be very useful to expand the photographic files beyond route analysis to illustrate the narratives on naturalness, solitude and, when appropriate, primitive and unconfined recreation and supplemental values.

Primitive and Unconfined Recreation- Opportunity for hunting is sometimes mentioned, but almost always it is discounted because hunting and other recreational pursuits are currently *associated with motorized access*. The fact that there may be an *opportunity* for nonmotorized hunting, trapping or other

primitive recreational activities is not taken into account (Lone Grave Butte N. OR 015-134B). The Oregon guidance stated “Present visitor use of an area is not necessary in evaluating this criterion. The factor to be determined is whether an outstanding opportunity is present, regardless of the amount of use.” (Nearly identical in 6310) For example, an opportunity for a primitive recreational activity, such as backpacking, only needs to be available, regardless if people are only car camping at the present time (Rabbit Hills NE OR 015-091, Lone Grave Butte N. OR 015-134B).

The type of hunting that takes place in the unit is rarely mentioned. If it is bighorn sheep or trophy mule deer, that could be considered an outstanding opportunity, because it is such a high-valued sport, and out of the ordinary (Lone Grave Butte North OR 015-134B).

Solitude- The narratives often state that since a unit is presently open for motorized travel, and there are motorized routes (not roads) within the unit, visitors will be impacted in seeking an opportunity for solitude because they may hear a vehicle when they are within the unit’s boundaries. There is never a discussion of how often this is likely to occur, or if there are places in the unit where this may not occur because of the pattern of motorized trails, topographic screening, etc. In most cases, it would be unusual to have so much traffic on such primitive trails that an opportunity for solitude is not available. When this logic is used to disqualify an area, more details need to be provided on how the present motorized use is impacting users throughout the unit.

Frequently, a large unit, over 10,000 acres, is described as relatively flat with only low vegetation (e.g. sagebrush) with a conclusion that there is no outstanding opportunity for solitude, without taking into account how the large size and possibly broad configuration might compensate for the relative lack of screening. Topography may indeed be more rolling or broken in part of the unit, offering opportunities for solitude in a portion, but this is often discounted or sometimes not mentioned, even though it is apparent on the map (Bull Lake OR 015-09, Saunders Rim OR 015-06-065, Twin Butte OR 015-064, Horseshoe Rim OR-015-087, Lone Grave Butte N. OR 015-134B, Guano Lake OR 015-135, Lone Grave Butte S. OR 015-134C).

Sometimes solitude opportunities are acknowledged to be present in a portion of the unit due to broken topography, but since most of the unit may be devoid of most topographic screening, the narrative concludes that “when taken as a whole, the unit does not present outstanding opportunities for solitude” (Horseshoe Rim OR 015-087). The guidance however, states that in regard to outstanding opportunities for solitude or primitive and unconfined recreation “Do not disqualify an area based on a finding that outstanding opportunities exist in only a portion of the area.”

In one unit (Little Benjamin Lake OR 015-06), juniper screening was noted to have increased since 1980 across the unit so that the entire unit is covered with low and medium juniper densities, particularly in the north half. Since, in the south half, opportunities have not changed since 1980 (presumably because

it has had less of an increase in juniper screening) it still doesn't meet the outstanding threshold. However, outstanding opportunities only have to be present in a portion of the area. Part of the original logic for this area also was that it was too narrow to have outstanding opportunities and its limited topographic screening also was noted as a factor, but it is about 7 miles in length and 5 miles in width at its widest, and is not really narrow except near the northern apex. There is some topographic screening scattered across the unit, so a lack of topographic screening does not seem to be an accurate depiction of the unit's topography. The narrative states that "The unit's topography has not changed since 1980. Much of the unit is relatively flat," so it concludes that opportunities for solitude have not changed.

Naturalness- Sometimes an entire large unit is eliminated for lack of naturalness when the map indicates most of the intrusions are concentrated in only a portion of the unit. In cases like this, consideration should be given to eliminating the unnatural portion, and proceeding with the review of the remainder that is greater than 5,000 acres. If this is not possible, a statement should be included that there is no portion over 5,000 acres that is natural and could be further considered. "Does the unit (or the remainder of the unit if a portion has been excluded due to unnaturalness and the remainder is of sufficient size) have outstanding opportunities for solitude?" (6310 & Oregon guidance) (See Coyote Hills OR-015-110, Coyote Hills East OR 015-111, Sunstone Mine North OR 015-088, Rabbit Hills NE OR 015-091). Sometimes the unnatural portion was deleted and the remainder of the natural portion of the unit was appropriately considered for the remaining wilderness characteristics (Guano Lake OR 015-135).

Comparisons- Inventory units are sometimes found to have less than outstanding opportunities for solitude or primitive and unconfined types of recreation because their opportunities are similar to those found on surrounding public lands managed by BLM. This is a type of comparison that should be avoided in the future, as BLM Manual 6310 states, "Do not compare the lands in question with other parcels." Other guidance has cautioned "Do not compare the lands in question with other parcels to arrive at some concept of 'the best of the best.'" The fact that a unit's opportunities are similar to those offered outside the unit does not automatically render the opportunities less than outstanding. Entire landscapes can be judged as providing outstanding opportunities (e.g., large lava beds that provide for lava tube exploration and geologic study, or trophy mule deer or bighorn sheep hunting areas), and the inventory units within them can claim their share of those outstanding opportunities. Units discounting opportunities because they also occur on surrounding lands should be reassessed in the future (Little Benjamin Lake OR 015-06, Lone Grave Butte S. OR 015-134C, Guano Lake OR 015-135).

Route Analysis- Good use of route analysis forms was noted overall, with extensive photo documentation provided to support the findings. A potential concern is that there seemed to be great weight associated with the facility asset management system (FAMS)-assigned road maintenance level

in determining whether or not the route met the maintenance test when there was no physical evidence of maintenance or record of maintenance having been performed (i.e., “If the route or route segment is in good condition, but there is no evidence of maintenance, would mechanical maintenance with hand tools or machines be approved by BLM to meet the purpose(s) of the route in the event this route became impassable?”). While FAMS may be a logical consideration, it should not be relied on as the final word. The actual need to keep the route open and the past evidence of regular and continuous use as well as the likelihood of BLM ever committing resources to keep the route open if maintenance were needed in the future should be considered, despite what the FAMS classification is.

One of the critical factors to determine whether a route is a road for wilderness characteristics inventory purposes is that in order to be considered a road which would form part of the inventory unit boundary, it must be maintained to ensure relatively regular and continuous use (Route Analysis Form III. B). In the event that there is no evidence or documentation of maintenance using hand tools or machinery, the maintenance test can still be met if the following question is checked “Yes” on the form: “If the route segment is in good condition, but there is no evidence of maintenance, would mechanical maintenance with hand tools or machines be approved by BLM to meet the purpose(s) of the route in the event this route became impassable?” An affirmative answer to this question sometimes makes the difference in the route being classified as a wilderness inventory road. Where this question has been answered “yes,” managers signing the Summary of Analysis page in Appendix B on the inventory form need to realize that by doing so, they are affirming that the route has sufficiently high priority to support a reasonable expectation that timely repairs would ensure its relatively regular and continuous use.

Citizen Information-Citizen information (primarily from ONDA) was supplied for most of the units that were inventoried and was properly documented by BLM. In most of the reports, there is sufficient narrative explaining what was submitted and how it was considered in the inventory maintenance process. However, there are some examples of only a very brief acknowledgement that photographs were submitted by ONDA and little or no evidence provided regarding how the information was considered (Horseshoe Rim OR 015-087, Sunstone Mine North OR 015-088, Rabbit Hills NE OR 015-091, Hart Mt. SE OR 015-134B.) BLM often explained how the consideration of ONDA material either did or did not affect the final inventory finding for the specific inventory unit, but sometimes it did not offer such an explanation (Sunstone OR 015-161). A frequent response to the citizen information was that BLM disagreed with many of ONDA’s findings that inventoried routes often did not meet the inventory road definition (“The BLM ID team determined that several of the routes ONDA identified as “ways” are, in fact, roads defining inventory unit boundaries. For this reason, the BLM found that the proposed WSA is not one large roadless unit, but is comprised of several smaller inventory units...” _). BLM nearly always concludes that larger roadless blocks proposed for “WSA” status by ONDA were in fact broken into smaller blocks by roads, thus providing fewer wilderness

characteristics than ONDA believed were there. Such disagreements with citizen information underscore the importance of documented route analyses confirming that each route in question meets the wilderness inventory road definition.

Baseline Inventory Findings- It is appropriate to make a change to a baseline inventory finding of no wilderness characteristics during inventory maintenance when changed conditions are observed that warrant a finding that wilderness characteristics are now present. An example is an area that was found to be unnatural in the past due to the visibility of drilled rows in a seeding, that appear more natural over time as sagebrush and other vegetation infilling reduces the unnatural appearance of the seeded area.

It is also appropriate to make a change to a baseline inventory finding of no wilderness characteristics if the narratives identified on Form 1 do not accurately reflect the critical factors of topographic screening, size, or vegetative screening conditions that are present in the area as they influence a finding of outstanding opportunities for solitude. It is possible that the earlier inventory either did not accurately describe the conditions on the ground at the time (an inventory error, *e.g.* topographic variation that influences solitude was overlooked or not adequately described), and that a more accurate description would yield a finding of outstanding opportunities for solitude. Likewise, a primitive recreation opportunity may have been overlooked during the earlier inventory that is now present in the unit, and that if accurately described, could yield a changed finding regarding the presence of outstanding opportunities for solitude or primitive and unconfined recreation.

APPENDIX A

Vale District - Major Observations of Inventory Reports

Barron Valley GMA

Rye Grass OR 036-020: This 20,361 acre unit was found to lack wilderness characteristics. The District did a good job of explaining why ONDA information that indicated several routes are “ways” was not valid, and that the unit is not contiguous with the WSA. Route documentation forms with accompanying photographs indicate they are roads. The solitude narrative could have better addressed why this unit does not have outstanding opportunities for solitude. The primitive and unconfined recreation narrative describes the presence of a designated BLM significant cave. This raises a question why it does not provide outstanding opportunities for primitive and unconfined recreation, especially since the cave was designated in part because of its recreational caving opportunities.

Flat Top Mountain OR 036-022: This 17,167 acre unit was found to lack wilderness characteristics. No ONDA information was received, and the narrative could have clarified that point. The finding was supported by the narratives, but photographs should be included in the future to help illustrate the naturalness and solitude conditions.

Tourist Court OR 036-023: The entire unit of 9,335 acres was found to lack wilderness characteristics. Outside sights and sounds were used in the solitude analysis, but could be better explained that this is an exception to the general rule not to use outside sights and sounds. Photographic documentation could better support the narrative findings, but there was none.

Military Road OR-036-025: This 11,414 acre unit lacks wilderness characteristics. No ONDA comment was received and the narrative could have stated that there was no citizen input. The solitude narrative was very brief. It could have more fully explained why outstanding opportunities for solitude were lacking.

Red Hills OR 036-026: This 14,161 acre unit was found to lack wilderness characteristics. Three smaller units in the baseline inventory were combined into one larger unit, but no route analysis forms were included to document route status. Photos would have helped document the analysis, but were not provided.

Sand Hills OR 036-027: The entire 6,600 acres of this unit did not have wilderness characteristics. Narratives for the criteria were adequately written, although the solitude discussion could have been expanded for more complete analysis. There were no photographs supplied to support the narratives.

Cherry Well OR 036-032: The unit is comprised of three parcels totaling 13,519 acres. The unit is now contiguous with a WSA because of a road change since the baseline inventory. The acreage that was found to have wilderness characteristics and the portion found unnatural and not having wilderness characteristics is not specified. Good, informative narratives documenting naturalness, solitude and primitive and unconfined recreation were included. In the future, photographs should be taken to support the narratives.

Bedground Reservoir OR 036-040: The entire 9,444 acre unit was lacking wilderness characteristics. The narratives were adequate, although the solitude narrative was brief and could have been expanded to better support the narrative regarding a lack of screening.

Winter Range OR-036-072: The entire 90,815 acre unit was documented to lack wilderness characteristics. The naturalness narrative adequately describes the situation of the numerous intrusions that impact the degree of naturalness, but photographs would have helped to support the narrative. The solitude narrative did not need to be completed since the finding of no naturalness precludes the need for further analysis. However, since the narrative was prepared, more supporting narrative and photos would have helped explain why this very large unit does not have outstanding opportunities.

Hardin OR 036-073: The 25,744 acre unit did not have wilderness characteristics. The finding of no naturalness was supported by the narrative, which indicates that frequent fires make the intrusions more noticeable. Photographs would have helped illustrate this point. The lack of sufficient vegetative screening due to the frequent fires was a factor for the finding of insufficient opportunities for solitude. However, because of the large size of the unit, more explanation in the narrative would be helpful. Photographic documentation would have helped to support both narratives.

Alvord Desert Contiguous OR 036-093: The small 356-acre unit (two small parcels) is contiguous with the WSA and does have wilderness characteristics. The two areas were logically described as having wilderness characteristics in the narratives.

Cow Creek GMA

Lower Cow Lake OR 036-052: Wilderness characteristics were found on a 1,731-acre unit that is now contiguous with Jordan Craters WSA. The narrative states outside sights and sounds from boundary roads and private/state lands detract from solitude, so that the small unit does not have solitude when

considered on its own, but rightly concludes that since it is now contiguous with the WSA, it shares the outstanding opportunities in the WSA. In the future, the narrative should simply describe that it is a part of the larger roadless area contiguous with the WSA, with no effort to make a case that if it were still separate from the WSA, the small portion of the roadless area would not qualify on its own.

Deer Butte OR 036-053: No wilderness characteristics were found on this 15,826-acre unit. The narrative and map describe and illustrate that a portion of the area is in a natural condition and a portion is not, but acreage locations of these portions are not clearly specified. The natural portion was then evaluated for outstanding opportunities and was found to have none, but it is not clear what size of area was being evaluated. Bighorn sheep hunting is listed as a possible outstanding primitive recreational activity but then language was included discounting the opportunity, which raises uncertainty regarding why the opportunity is not outstanding. A road form indicates maintenance has been performed, but that there is no record of it...while the photos could be interpreted to illustrate original construction activity rather than maintenance.

Clarks Butte Contiguous OR 036-057: Wilderness characteristics were found on a portion of the unit because it is now contiguous with the Clarks Butte WSA. The narrative describes two subunits that are natural in character, while the remainder of the unit is not natural, but the acreage of the natural portions that remained for further analysis was not provided. The naturalness discussion adequately describes the condition of naturalness. Fence lines were used in part to eliminate a portion of the unit on the basis of a lack of naturalness. There needed to be more narrative and photographic documentation to help explain why these facilities that are allowable within wilderness, and do not necessarily disqualify an area as not being natural, in this case did influence the finding of a lack of naturalness. The solitude and primitive and unconfined recreation discussions do rightly conclude that outstanding opportunities are present. They tend to focus, however, on the fact that if they were still separated from the WSA, they would not have these opportunities. Since they are now contiguous with the WSA, that angle of the narratives is somewhat confusing, and could be clarified in the future.

Bogus Rim OR 036-059: The entire 5,686-acre unit was determined to lack wilderness characteristics. The analysis adequately supports the decision that the boundary is set on an inventoried road, however, the photos provided do not strongly support the evidence of machine maintenance. All of the photos provided are of intrusions, and there are no photos that were included to support a determination of the lack of opportunities for solitude or scenic/landscape relationships. Distance, a function of unit size, can be parameter for determination of solitude opportunities. Although this factor is not specifically described in the guidance, it is a factor that in the future can be used to help describe solitude opportunities.

Arock OR-036-074: No wilderness characteristics were found on this 23,274-acre unit. The entire unit was not in a natural condition. There was adequate identification of developments, but the narrative could be supported by photographs which would illustrate the proximity of primitive routes and pipelines which the narrative identifies as rationale for the lack of naturalness. The solitude rationale implies a solitude requirement for the entire unit rather than isolated locations. Photos would help support the finding of a lack of solitude and the landscape relation to solitude. Overall, the road/route analysis supports the determination that the boundary is set on an inventoried road. However, evidence of machine maintenance is sketchy, based upon the photos provided. Photos could benefit by better definition of direction taken, and expanded labeling.

Indian Camp OR 036-075: The entire 10,332 acres of this unit were found to lack wilderness characteristics. The naturalness narrative does support the finding, but could better compare the present condition to that found in the baseline inventory. Solitude opportunities are addressed through size, configuration and topographic/vegetative screening, but photos depicting the factors that influence the determination on solitude would be helpful.

Lower Owyhee Contiguous OR 036-077: Three subunits are contiguous with the Lower Owyhee WSA, but only one is considered natural and possessing wilderness characteristics, totaling 1,898 acres. A larger portion of the unit was found to lack naturalness. Photo documentation would be helpful to illustrate the differences in the apparent naturalness among the three subunits. The narrative does support the determination for unit A, however the elimination of the larger unit B (14,439 acres) for a lack of naturalness could be supported by photographic documentation. The narratives for solitude and primitive and unconfined recreation are written as if they were stand-alone units rather than being contiguous with the WSA. A better approach would be to acknowledge that they share the opportunities already identified in the WSA, since they are a part of the same roadless area.

Lava OR 036-081: The entire 8,307-acre unit was found to lack wilderness characteristics. The naturalness narrative did identify the major human features and topography in the area, supporting the conclusion of naturalness. The narrative adequately concluded that solitude opportunities were not outstanding due to the outside sights and sounds from boundary roads, combined with a lack of topographic and vegetative screening. The narrative did address recreational opportunities appropriately, but could have discussed the presence of sage grouse mentioned in supplemental values as an opportunity for photography.

Goodyear OR 036-082: No wilderness characteristics were found throughout the 8,521-acre unit. The naturalness narrative identified major human features and topography, but tended to use the concentration of motorized primitive trails in the northeastern portion to determine naturalness, while the remainder of the unit is only crossed by single routes and is more open, but was also excluded.

Outside sights and sounds from US 95, combined with lack of screening were detracting to solitude opportunities. Sage grouse were identified as a supplemental value, but were not considered as a potential opportunity for primitive and unconfined recreation to photograph greater sage grouse on two leks within the unit.

Purser Ridge OR 036-083: No wilderness characteristics were found on this 6,389-acre unit. The inventory unit overlaps the Boise District in Idaho, and is roughly divided between the two states. Only the Oregon portion was inventoried, as the Boise District has not responded to Oregon's attempt to conduct a joint analysis. Oregon adequately inventoried their portion, but did not provide speculative analysis on what the findings might be for the entire unit.

Jordan Craters Contiguous OR 036-092: The entire 971 acres was found to possess wilderness characteristics since it is now contiguous with the Jordan Craters WSA.

Owyhee GMA

The Tongue OR 034-054: This 16,302-acre unit was found to possess wilderness characteristics. This is a good report overall. The naturalness narrative provides a good discussion of fencing, primitive routes, and rangeland projects that are present, but not substantially noticeable. There was some confusion in the solitude narrative that described portions of the unit having outstanding opportunities, and some areas that do not. Inventory guidance indicates that when outstanding opportunities are present, the entire natural portion generally qualifies. There was a good explanation of why ONDA's "way" is actually a road with a right of way.

Schnable Creek OR 034-057: This 14,704-acre unit has wilderness characteristics. This is a generally good report including narratives that support the findings. The naturalness narrative describes the imprints present, and includes an explanation of why they are substantially unnoticeable. Photographic support for the narratives was lacking and would be helpful. The "finger" that extends on the eastern side of the unit is included in the area with wilderness characteristics, but the narrative does not make this clear.

Rhinehart Creek OR 034-059: This 2,694-acre unit is now contiguous with two WSAs and has wilderness characteristics. BLM agreed with the information ONDA supplied regarding the change in boundary road status to primitive routes (ONDA's ways). Photos would have been helpful to support and document the solitude and naturalness narratives. Overall good analysis of the route forms and narratives was provided.

Clark Ranch OR 034-060: This 17,670-acre unit was documented to have wilderness characteristics. BLM agreed with information submitted by ONDA regarding the presence of wilderness

characteristics. A former road on the east portion was documented to have converted to a primitive route, and no longer forms a boundary so that the unit is now contiguous with a WSA. The narratives were good, describing the present conditions.

Cold Spring OR 034-061: The entire 31,221-acre unit was found to possess wilderness characteristics. The analysis contained good narratives that adequately documented the change in naturalness over time. The solitude narrative was overly brief, though logical. Photos would have helped to document the conditions described. Likewise the naturalness narrative would have benefited with the inclusion of photos depicting the present natural character of the old chemical treatment.

Table Mountain OR 034-098: The unit's 5,892 acres lacked wilderness characteristics. A portion of this unit was found to lack naturalness, and the remaining part did not have outstanding opportunities.

McCain Springs OR 034-099: This small, 5,057-acre unit lacked wilderness characteristics. The naturalness narrative describes how a portion of the area is not in a natural condition. The remaining natural portion did not have outstanding opportunities for solitude or primitive and unconfined recreation.

Wild Rose Reservoir OR 034-100: The entire 12,420-acre unit did not have wilderness characteristics. The naturalness narrative describes how extensive and visible fencing and numerous primitive routes impact naturalness, so that element was considered substantially noticeable. Photographic documentation of the naturalness condition would have supported this narrative but was not included.

Blue Canyon Contiguous OR 034-113: This 3,786-acre unit is now contiguous with the WSA and is in five separate parcels. All of the acreage was found to contain wilderness characteristics because of its contiguity to the WSA.

Lower Owyhee OR 034-115: This 588-acre unit consists of five subunits and all have wilderness characteristics due to their contiguity with the WSA. The findings were logical, but photos would have helped to illustrate their natural qualities.

Saddle Butte Contiguous OR 034-120: This 5,779-acre unit was found to have wilderness characteristics. It is no longer separated from the WSA by a road and is now contiguous with it. The narratives describe the situation, but a road form could have been included to document the changed nature of the old fenceline road that is now considered a primitive route.

Rattlesnake GMA

Rattlesnake Creek OR 036-028: The entire 66,078-acre unit was found to possess wilderness characteristics. The narratives did a good job of supporting the findings. The naturalness and solitude

narratives could have been supported by photographs illustrating the factors considered. A decorative rock collection site was described under the naturalness discussion, raising a question of whether or not that area should have been excluded. The narrative includes a reference to comparisons with other areas, which should not be included as part of the analysis. The supplemental values discussion includes a comparison to other areas in the state, which is not necessary and should not be included in the analysis.

Deadhorse OR 036-029: This unit was found to possess wilderness characteristics, but no acreage was listed. A portion of the area was found to lack naturalness, and the remainder was appropriately considered for wilderness characteristics. Photographic documentation could have been included to support the naturalness narrative. Sage grouse leks are present and noted in the supplemental values, but could also have been evaluated as a possible photographic opportunity under primitive and unconfined recreation. Under supplemental values, comparisons to other areas in the state should be avoided.

Alcorta Rim OR-036-030: A portion of this 53,543-acre unit was found to possess wilderness characteristics, but the acreage found to be natural and included was not provided, nor was the unnatural area's acreage provided. The analysis needs to clearly define the areas with and without wilderness characteristics. The area appropriately describes its contiguity with the existing WSA. The road form could be clarified in the future.

Cherry Well OR 036-032: The area consists of three parcels totaling 13,519 acres, is contiguous with a WSA, and a portion is found to have wilderness characteristics. The portion found to lack naturalness is not clearly described. The primitive and unconfined recreation narrative implies that there are no outstanding opportunities in the unit, even though it is contiguous with the WSA and shares the WSA's opportunities.

Succor Creek GMA

McIntyre Ridge OR 034-014: Wilderness characteristics were found on 11,968 acres of the unit, and 2,678 acres were found to lack naturalness. The naturalness narrative and map illustrated these conditions. Outstanding opportunities for bighorn sheep hunting qualified as outstanding opportunities for primitive and unconfined recreation. The narrow configuration disqualified the area for solitude. Photographs describing naturalness and solitude conditions would be helpful in the future.

Board Corral Spring OR 034-015: Wilderness characteristics were found on all 5,416 acres of this unit because it is now contiguous with a WSA, since a road has converted to a primitive route. Good narratives fully explain the criteria. A seeding that disqualified the area in the past has recovered and

is now natural in appearance. Photographs would help support the naturalness and solitude narratives.

Board Corral Mountain OR 034-016: Wilderness characteristics in this 15,463-acre unit were documented to be present, but the acreage of the portion found to be not natural was not provided. The naturalness narrative adequately explains why a portion was deleted, but the map did not illustrate its location. The ONDA information was well referenced.

Antelope Creek OR 034-018: The entire 10,737-acre unit was found to have wilderness characteristics. No original baseline inventory information was available. Narratives support findings but photographs would support the narratives in the future.

Rookie Creek OR 034-019: This small 890-acre unit is now contiguous with a WSA, and BLM agrees with ONDA that it has wilderness characteristics.

Mahogany Mountain OR 034-032: This 11,942-acre unit was found to lack wilderness characteristics. The discussion of the effect of the configuration of the unit on opportunities for solitude is somewhat confusing and could be clarified. The finding of no outstanding opportunity for solitude was logical, however.

Three Fingers Rock South OR 034-055: The 8,253-acre unit was found to lack wilderness characteristics. There was good photographic documentation for the route analysis, but additional photos to illustrate the naturalness discussion would be helpful. A small portion of the unit was found to not be in a natural condition, but the analysis correctly continued on the remaining natural portion. The District did a good job of analyzing the ONDA supplied material, and explained why they disagreed on route status.

Three Fingers Rock North OR 034-056: The entire 13,177 acres of the unit were found to possess wilderness characteristics. The narratives were complete, thorough and well-written. There was good analysis of ONDA's findings, and response to them. Maps were good, but photos would be helpful to support narratives beyond route analysis.

Steamboat Ridge OR 034-058: The entire 3,947-acre unit is adjacent to a WSA and was found to have wilderness characteristics. No route form documenting the change in status from a road to a primitive route was included, and would be helpful documentation in the future. BLM agrees with the ONDA findings, and provides good, logical narrative and maps.

Spanish Charlie Basin OR 034-092: A 20,681-acre portion was found to have wilderness characteristics and 5,831 acres were found to lack them. This unit overlaps the state line with Idaho. A memorandum

was included explaining that Vale conducted the inventory on their side of the line in advance of Idaho, and found the area on their side to meet the criteria. A fence along the state line separates the two sides. Idaho since has documented why their side does not have wilderness characteristics. The findings appear supportable.

McBride Creek OR 034-093: This interstate unit contains 6,979 acres in Oregon and 6,686 acres in Idaho, and the entire area lacks wilderness characteristics. A fence separates the two portions of the unit along the state line. The Vale inventory was conducted without Boise District participation so the findings originally were just for the Oregon side. A memo states that the Idaho inventory was conducted later and found their side to lack naturalness. The findings appear supportable.

Smith Butte OR 034-094: The entire 6,708-acre unit was found to lack wilderness characteristics. Good naturalness and solitude opportunity narratives were included but photographs to support the narrative findings would be beneficial.

Bannock Ridge OR 034-095: The entire 10,184-acre unit was found to have wilderness characteristics. An excellent naturalness narrative explains how conditions have changed over the years affecting the appearance of an old vegetative treatment. A road boundary has changed status making the unit contiguous to a WSA. A ridgeline had been used as a boundary of the unit in 1980, which was recognized as an error. A seeding that disqualified a portion of the area in 1980 was actually found to be in error as it was outside of the unit.

Spring Mountain OR 034-096: The entire 18,311-acre unit was found to have wilderness characteristics. Seedings that originally disqualified the area for lack of naturalness have since become more natural in appearance. The area was much larger in the baseline inventory, but a primitive route has converted to a road over time, decreasing the size of the unit. There was no road form included to document that change. The narratives are good, but photographs would have been helpful to document the current natural appearance of the area.

Wilson Creek OR 034-097: This 5,323-acre unit does not have wilderness characteristics. The western boundary has been determined to be a road, having converted from a primitive route since the baseline inventory, but no route analysis form was included. Traffic on a boundary road influences opportunities for solitude.

Dry Creek OR 034-111: This is an interstate unit crossing the border with Idaho. The 2,873-acre portion in Oregon and the 4,934-acre portion in Idaho lack wilderness characteristics—the entire unit. A memorandum explains that Vale inventoried their side two years before the Boise District conducted their inventory. Good maps were included but photos would also have been helpful to illustrate conditions.

Coal Mine Basin OR 034-112: This interstate unit also crosses the Oregon-Idaho border. The entire unit was found to lack wilderness characteristics, involving 1,496 acres in Oregon and 24,400 acres in Idaho. A fence separates the two portions along the state line. The map and discussions describing a single roadless area were good, but photographs would have been helpful to illustrate naturalness conditions.

Honeycombs Contiguous OR 034-116: Two small parcels totaling 526 acres were found to possess wilderness characteristics, being adjacent to the Honeycombs WSA. Wilderness characteristics narratives explain the fact that the units share the opportunities found in the adjoining WSA.

Wildhorse Basin Contiguous OR 034-118: Two small parcels totaling 608 acres have wilderness characteristics since they are now contiguous with the WSA. They were under the State of Oregon administration at the time of the baseline inventory.

Willow Creek GMA

Poison Creek OR 036-082: The 5,601-acre unit was determined not to have wilderness characteristics. The narratives adequately describe the presence of naturalness and the findings that there are no outstanding opportunities for solitude or primitive and unconfined recreation.

Cottonwood Mountain OR 036-083: The entire 7,655 acres of this unit was determined not to have wilderness characteristics. Naturalness and primitive and unconfined recreation narratives described appropriate factors for consideration. The solitude narrative could have provided more clarity in describing opportunities present, but that they are less than outstanding.

Hope Butte OR 036-085: The 6,853-acre unit was found to lack wilderness characteristics. The western boundary road entering private lands could have been used to show that a portion of the unit would not meet the size criteria. Another road also could have been used in the analysis to document lack of wilderness characteristics.

McCarthy Ridge OR 036-102: This 6,175-acre unit was found to lack wilderness characteristics. Narratives adequately described all required components. Routes that were found to be substantially noticeable could have been used to divide the unit, which would have affected the size criteria, dividing it into smaller unit.

Striped Mountain OR 036-103: The 6,191-acre unit was documented to lack wilderness characteristics. No photographs were included in the file, and the narrative for solitude would have been strengthened with the inclusion of supporting documentation illustrating lack of screening. The narrative implies that vegetative screening is necessary for outstanding opportunities. The naturalness narrative adequately addressed factors that affect the degree of naturalness. The presence of sage grouse leks

was noted in the supplemental values section, and could have been evaluated in the primitive and unconfined narrative as a possible opportunity for photography.

Thorn Flat OR 036-109: The 7,095 acre unit was found to lack wilderness characteristics. The analysis appears to emphasize the need for vegetative screening in order to determine the presence of outstanding solitude opportunities.

APPENDIX B

Vale District Major Observations of the Field Review-

June 29 – Succor Creek GMA

Kari Points, Dave Mermejo, Dave Harmon

McIntyre Ridge OR 034-014: The northern tip of the unit was considered unnatural, but didn't appear to be much different from the portion that was considered natural, with the imprints substantially unnoticeable. However, it was probable that when the inventory was conducted in 2010, the effects of a burn were more recent and would have made it easier to see the imprints. It appears that their call was correct.

Travelling south along the western boundary road along the ridge, there appeared to be significant topographical screening with numerous cliffs and outcrops, however the narrative says there isn't much topographical variation, and not enough to provide outstanding solitude. It is only about two miles wide throughout the unit, however, so it is plausible to determine the entire unit does not have outstanding opportunities, though it was a close call. No boundary road form was used, but there is no question that the western boundary was a road.

Board Corral Spring OR 034-015: We travelled along the southwest boundary road adjacent to Honeycomb WSA. There was no question that it was a road, but a road form should be used for boundary roads like this in the future. (There was one used for the north and west route, which confirmed it is now contiguous with Wild Horse WSA.) Similar to the other units, there were no photos taken to illustrate the solitude and naturalness opportunities to accompany the narrative, and we explained why this would be helpful.

Board Corral Mountain OR 034-016: The unit does not have outstanding primitive recreation opportunities, but does have bighorn sheep. It is adjacent to McIntyre Ridge which has sheep and outstanding primitive recreation opportunities. Sometimes in Vale, the presence of sheep seems to be enough to qualify. Perhaps the other rock features contributed to outstanding primitive recreation for McIntyre in combination with the presence of bighorn sheep, but this distinction could be clarified.

June 30 – Cow Creek GMA & Owyhee GMA

Kari Points, Brent Grasty, Dave Mermejo, Dave Harmon

Cow Creek GMA

Bogus Rim OR-036-059: The boundary road on the southeast, which we travelled along, was contested by ONDA, but there is no question that it is a road. Here and in nearly all of their reports, the District staff did a good job in filling out their road forms, with good photo documentation supporting their findings. We had a good discussion on the attributes of solitude, and their finding in Bogus that due to size, and lack of vegetative and topographic screening, there was no outstanding solitude. We also discussed the effects of the rim and how it influenced opportunities for solitude (if a visitor was on the south side of the rim, near the south boundary road, they would be screened from the broad open topography south of the rim, and sound would not travel to the southern portion.) The finding of no outstanding solitude is plausible.

Owyhee GMA

Wild Rose OR 034-100: We traveled along the south and east boundary roads after leaving Coffeepot Crater at Jordan Valley WSA. The District finding that the area lacks naturalness because of extensive and visible fencing, and the visibility of primitive routes due to lack of screening is plausible, but should have been supported by representative photos of the fencing. We saw a pair of sage hens close to the road.

The Tongue OR 034-054: We traveled along the southwest boundary road (the east boundary of Wild Rose). Smoke from the Leslie Gulch fire was getting close, so we decided to turn around after travelling up the west boundary road. We discussed why the District appropriately left the entire acreage in without removing the strip to the north of the big private block for lack of solitude. There is little development or activity that currently affects the solitude opportunities there, so the inventory appeared correct.

Schnable Creek OR 034-057: We traveled along the southern and lower part of the southwestern boundaries. The southwestern boundary road was found to turn into a primitive route further north, adding a parcel of land. The finding of outstanding solitude is appropriate given the hills, rolling topography and draws in a portion of the unit. The highest mountain in the distance (Mahogany) is on private. The narrative on solitude was a bit brief, but logical.

McCain OR 034-099: We traveled along the northern boundary road. There was not much to see, but the finding of no wilderness characteristics was logical. Later as we drove to Ontario, this unit was

referred to in a discussion regarding the size criterion. It was larger than 5,000 acres, but after an unnatural portion was removed, the remaining natural portion was less than 5,000 acres, so the unit was dropped for insufficient size and not further analyzed.

July 1 – Owyhee GMA

Kari Points, Brent Grasty, Dave Mermejo, Dave Harmon

Cold Spring OR 034-061: We arrived at the unit from the north at its northeast corner, and then traveled south along its eastern boundary road. The finding of the presence of naturalness was supportable, as the District had good documentation that over time, the area had become more natural (a change from that documented in 1980). BLM agrees with ONDA that the seeding which was substantially noticeable in the baseline inventory now appears to be more natural, and has changed enough so that the area now meets the naturalness criterion. BLM had found the area not to have outstanding primitive recreation opportunities, in part because the scenic vistas of the neighboring Cedar Mt. WSA cannot be considered as a value because "...outside (of an inventory unit) sights and landscapes are not qualifying criteria for determination of wilderness character of an inventory unit." This is a misinterpretation of the guidance prohibiting the use of outside sights and sounds when analyzing the naturalness and solitude criteria. There is no guidance in either the present 6310 manual or the draft H-6300-1 Handbook that supports a prohibition of consideration of scenic vistas of lands surrounding the inventory unit as a primitive recreational value. The scenic vista of Cedar Mt. WSA could have been considered as a value, as ONDA suggested. The finding of no outstanding primitive recreation is moot, however, since the area still qualified as lands with wilderness characteristics with the finding of outstanding opportunities for solitude.

Clark Ranch OR034-060: We traveled along the northern boundary road and stopped to inspect the northern terminus of the former eastern boundary road. The route was determined to be a road in the baseline inventory but is now considered a primitive route, which results in the unit being contiguous with the Lower Owyhee Canyon WSA. The route did not pass the maintenance test. If access was ever needed to maintain the fence or reservoirs, it could be accomplished without maintenance since the flat terrain and lack of rocks precludes the need for maintenance. It passed all of the other road criteria, but not this maintenance criterion.

Rhinehart OR034-059: We traveled along the southern and eastern boundaries to the northeastern corner of the unit. The eastern boundary was a county road but no longer meets the road criterion and is now considered a primitive route, making it contiguous with the Lower Owyhee Canyon WSA. This

appears to be the correct call. The northern boundary road has also changed status to a primitive route, making the unit also contiguous with Cedar Mt. WSA.

APPENDIX C

Lakeview District - Major Observations of Inventory Reports

Abert Rim Evaluation Area

Snyder Creek 1 OR 015-101A: This 26-acre parcel is contiguous with the WSA and was determined to have wilderness characteristics, sharing those found in the WSA. It had been separated from the WSA by a ditch, but that feature has become more natural over time.

Snyder Creek 2 OR 015-101B: The 834-acre unit is contiguous with the WSA and determined to have wilderness characteristics, sharing those found in the WSA. It had been separated from the WSA by a road, but that feature has become more primitive and natural over time.

Colvin Lake OR 015-104: Naturalness was found to be lacking throughout this unit (the current acreage was not provided in the narrative). Fencing and primitive routes exist and that, along with eastside views of a powerline, were considered to eliminate a natural condition on the entire area. The consideration of the effects of the outside sights of the BPA powerline located just outside of the unit was appropriate under the guidance for naturalness. Photographic evidence of the unnatural character of the landscape would have supported the naturalness narrative, especially since this finding made it not necessary to evaluate the remaining wilderness characteristics.

Binkie Lake OR 015-102: The findings disagree with ONDA's findings on the size of the unit, since BLM documented a road that splits ONDA's unit into two pieces. A powerline on the eastern boundary was used to disqualify a portion of the unit as being unnatural, but photographic evidence of the visibility of the powerline within the unit would have been helpful to support the naturalness narrative. Also, since the entire area was found to be unnatural, photographs of the noticeable character of the fourteen miles of routes would have been helpful to support the findings. Likewise, the fact that the sagebrush flat provides little screening of the unnatural features would benefit from support from photographic documentation. Since the entire unit was found to be unnatural, no further analysis of wilderness characteristics was conducted, in conformance with guidance.

Bald Mountain Evaluation Area

Bald Mountain OR 015-144: Approximately 14,040 acres were initially found to meet the size criteria for wilderness characteristics inventory. Vehicle route 6126-B0 identified by ONDA as a way was determined in the inventory update to be a wilderness inventory road, which isolated approximately 4,449 acres from the main body of the unit. This area was determined not to have wilderness characteristics based upon insufficient size. This is not indicated clearly within the narrative, but is

derived from the attached map of the unit. Unit analysis for solitude appears to emphasize vegetative screening for the final determination of the presence or absence of solitude opportunities. The determination of solitude is not generally based upon one criterion only but should be a combination of vegetative screening; topography, distance and sound. In such situations, photographic documentation would definitely provide support to any analysis.

Breezy Evaluation Area

Breezy OR 015-58A, Breezy East 015-58B, Breezy North 015-0000, Breezy Northwest 015-0000: These are four small units, two of which qualify as being contiguous with the USFWS wilderness proposal, and have wilderness characteristics. A separating fence is no longer visible, and does not detract from naturalness. The USFWS didn't specifically inventory for solitude or primitive recreation, so there is a somewhat confusing narrative provided regarding the presence of outstanding opportunities for solitude and a primitive and unconfined recreation. The boundary fence that was used, in part, to disqualify the area is no longer visible. Outside sights and sounds of the highway disqualified two of the units.

Burma Rim Evaluation Area

Sheep Rock Unit OR 015-048/047: The narrative adequately identified acquisition of State lands which are part of the inventory unit and described the unit boundaries and changes to those boundaries from the initial inventory in 1979. The narrative describing the opportunities for solitude are based primarily on outside sights and sounds; meaning the transmission line on the northern boundary and low level military training flights. The narrative at one point addresses clearly that these intrusions are generally not a consideration during analysis for solitude; but later uses the same intrusions as the final determination in dismissing opportunities for solitude. This can be somewhat confusing and future inventory updating should refrain from potentially contradictory analysis.

Coleman Valley Evaluation Area

Spanish Lake OR 015-121A: ONDA submitted photos on an adjacent area, some of which were used in this analysis. The unit apparently was found to be in an unnatural condition in 1980, although the wrong box was checked on Form 1. The updated inventory found that conditions had changed and that the area now is in a predominately natural condition—although photographic documentation would have been supportive, none was provided. Potential motorized traffic was emphasized as a reason the area lacks outstanding opportunities for solitude, but no explanation was provided of how frequent this traffic is, or whether or not there is still an opportunity for outstanding solitude within this 6 mile X 3.5 mile unit. The primitive recreation discussion concluded that opportunities were poor, and implied that a comparison was made with opportunities on surrounding lands. The guidance

discourages making such comparisons. Future inventory maintenance efforts should consider these points.

Greaser Reservoir OR 015-121B: This 4,267 acre unit did not meet the size criterion and was not evaluated further.

Coleman Valley West Evaluation Area

West Coleman Ranch OR 015-157/CA 020-1005: This unit was reviewed by both the Lakeview District and the Surprise Field Office, Northern California District, in a cooperative effort. While the area was found to meet the criteria of size and naturalness; the analysis determined the unit did not possess solitude or primitive recreation opportunities. The basis for the analysis is the west boundary is on a Backcountry Byway, powerlines on the boundary and the likelihood of vehicle use on interior routes. The BCB and powerlines would be considered as outside sights and sounds and should not be considered as significant impacts unless omnipresent; which should not be the case with an area 26,000+ acres in size. Future inventory reviews should re-evaluate the interpretation of the effect of outside sights and sounds on wilderness character. The narrative also noted the presence of an archeological ACEC and a suitable wild and scenic river segment which were not identified under supplemental values.

Cox Canyon Evaluation Area

Rehart Cyn OF 015-037: The 31,000+ acre Rehart unit was found not to be natural in character; the narrative citing extensive vegetative manipulation projects, mining activity and numerous other impacts by man. The narrative did not adequately describe the increase in human activity over the previous inventory, and could be improved when the inventory is updated.

Coyote Hills Evaluation Area

Coyote Hills OR 015-110: ONDA believes a 40,000-acre roadless unit exists, however BLM documentation supports the finding that three smaller and separate units exist. This entire 20,662-acre unit was found to lack naturalness, so no additional analysis of wilderness characteristics was conducted and is in conformance with guidance. Photographic documentation would have been helpful to support the findings of the naturalness analysis.

East Coyote Hills OR015-111: ONDA believes this is part of a larger roadless unit that has wilderness characteristics; however road analysis documentation conducted by BLM indicates that several roads split the area into three smaller units. This 15,785-acre unit was found to be in an unnatural condition due mainly to mineral exploration and mining within the western portion of the unit. No attempt was made to isolate this unnatural portion of the unit from what on the map appears to be a remaining

natural portion that is greater than 5,000 acres. Had this been done, an analysis of outstanding opportunities could have continued on the remainder of the unit. ONDA photographs were supplied that appear to show a more natural area than that described in the narrative. Future inventory efforts should address these points.

East Rabbit Hills Evaluation Area

Horseshoe Rim OR 015-087: This 15,021-acre unit was found to be in a natural condition, however outstanding opportunities for solitude and a primitive and unconfined recreation were absent. While there is minimal screening in much of the unit, there is a hilly portion (3,000 acres) in a central location that appears to have not been given much weight, and "...when taken as a whole, the unit doesn't present outstanding opportunities for solitude." Opportunities for solitude do not have to occur on every acre, but must be documented to be present somewhere in the unit, according to the guidance. The Horseshoe formation was described as not having outstanding recreation opportunities, and that appears to be an accurate description. The primitive and unconfined recreation discussion appears to imply that since most existing use is via motorized vehicles, this eliminates the opportunity for primitive and unconfined recreation, and that is not a valid assumption. Future inventory maintenance efforts should address these issues.

Sunstone Mine North OR 015-088: This is a large, 34,717-acre, unit that was found to lack naturalness throughout the entire unit, so it was not analyzed for the other wilderness characteristics. The naturalness narrative would have benefited from supportive photography that illustrated the unnatural character of the unit. The map indicates there may be a portion or portions of the unit that would be larger than 5,000 acres remaining after the unnatural area is removed from the unit, but no attempt was made to do so, and it would have been advisable to have considered this option.

Bacon Camp OR 015-089: This is a smaller 5,478-acre unit that was found to be in a natural condition, but to be lacking in outstanding opportunities for solitude due to its relatively small size and lack of screening. No outstanding primitive and unconfined recreation opportunities were noted. The analysis appears to be adequate to support the finding.

Rabbit Hills Northeast OR 015-091: This 10,565-acre unit was found to be in a natural condition, but due to its relatively long and narrow shape, and lack of vegetative and topographic screening (being a flat, dry lakebed), it was determined not to have outstanding opportunities for solitude. Photographic documentation illustrating the inability for users to find a secluded spot due to the configuration of the unit and the lack of screening could have helped support the narrative, but was lacking. Although flat, dry lakebeds that have large size and a broad configuration can have outstanding opportunities, that does not appear to be the case with this unit. Outstanding opportunities for primitive and unconfined

recreation were discounted because most present use is via motorized vehicles. This situation doesn't eliminate the possibility that there might still exist a primitive and unconfined recreation opportunity somewhere in the unit.

Sunstone OR 015-161: At 5,179 acres, this heavily impacted area was found to lack naturalness and was not evaluated further, which was appropriately documented in the narrative.

Fish Creek Rim Evaluation Area

Monument Flat OR 015-117A: Both the initial inventory and the recent inventory review found the 17,000+ acres of the unit as being natural in character. The unit is approximately 6 miles wide, 7 miles long and somewhat triangular in shape. The narrative makes good use of referencing photo documentation to support the physical analysis. However, the analysis for solitude and primitive recreation emphasize the lack of vegetative screening and topographic relief and military overflights as the primary factors in limiting opportunities. The analysis also states that because of the relative flatness of the unit and primitive motorized routes extending into the unit, opportunities for solitude are limited. There appears to be a general expectation that the presence of primitive vehicle routes imply a quantity of use that opportunities are bound to be effected. This may not be the case and should not be taken for granted. The analysis did not address supplemental values, but in the narrative for naturalness, an ACEC (vegetative) was identified in part of the unit. Generally the presence of an ACEC or other special designation should be examined for potential primitive recreation opportunities. The route/road form for 7142-00 showed good analysis and photo documentation.

Hart Mountain Southeast Evaluation Area

Lone Grave Butte North OR 015-134B: This unit is a part of ONDA's 424,000 acre WSA proposal, but BLM has provided documentation indicating that several roads subdivide the area into nine separate parcels, six of which are each larger than 5,000 acres. This large 19,587-acre unit was found to be in a relatively natural condition and was noted to have areas with topographic screening, but the wide open areas with relatively little topographic screening and low vegetation were found to disqualify the area for outstanding opportunities for solitude. Photographic documentation to support this narrative would have been helpful. The unit is contiguous with the Hart Mountain unit managed by the US Fish and Wildlife Service. Apparently the contiguous portion was considered by the Fish and Wildlife Service not to be wilderness quality in 1974. Primitive and unconfined recreation opportunities were found not to be outstanding, but this was in part because it was determined that most present recreational activity is by motorized vehicles. This fact does not preclude the possibility that there may still be an opportunity for primitive and unconfined recreation somewhere in the unit.

Lone Grave Butte South OR 015-134C: At 11,831 acres, this is a part of the larger area identified by ONDA. This area was found to be in a natural condition but documentation was provided supporting a finding of no outstanding opportunity for solitude. Opportunities for a primitive and unconfined type of recreation were identified but found to not be outstanding. Part of the support for no outstanding opportunities was based on a comparison to surrounding BLM lands, which is not an appropriate consideration under the guidance. This unit is also contiguous with a portion of the Hart Mountain Refuge that was found in 1974 not to have wilderness qualities.

Guano Lake OR 015-135: The 15, 035-acre unit was found to be in a natural condition, a change from the 1980 inventory. An unnatural portion of the unit was deleted at the north end, then the inventory appropriately considered the remainder of the unit for the other wilderness characteristics, but found them lacking. Solitude was not considered outstanding because the flat, relatively unvegetated dry lakebed that forms most of the unit makes it difficult for visitors to find a secluded spot. Photographic documentation would have been helpful to illustrate this lack of outstanding opportunities for solitude due to the lack of screening. Again a comparison to surrounding lands was incorporated into the primitive and unconfined recreation narrative, which is a consideration that should be avoided.

Hayes Butte Evaluation Area

Hayes Butte North OR 015-019: The analysis adequately addressed the findings between the initial inventory, which had identified vehicle routes that cut the unit into several areas that did not meet the size criteria, and the subsequent inventory update, which determined that these routes no longer meet the road criteria and are now primitive routes. This determination resulted in the unit being addressed as one rather than five subunits. The narrative, however, states that the unit as a whole is not natural because of motorized use on several primitive routes. According to the district RMP, those routes in the designated ACEC have been closed to vehicle use, but they continue to receive trespass use and are thus cited as part of the rationale why motorized use impacts the naturalness. The ACEC R & I values are unique vegetation so the district will definitely close the routes. This is a good example of where trespass or other unauthorized activities should not be used as rationale for the determination of the presence of wilderness characteristics. Because of the determination of a lack of naturalness, outstanding opportunities were not addressed.

Moonlight Butte Evaluation Area

Little Benjamin Lake OR 015-06: This is a 10,900-acre unit—a part of a larger 62,328-acre proposed WSA by ONDA. BLM road documentation supports BLM's finding that roads divide the proposed WSA. The unit was found to be in a substantially natural condition. However, despite the fact that juniper screening has increased since 1980, little has changed to support the finding of a lack of outstanding solitude. The primitive and unconfined recreation analysis documents the presence of

several lava tube caves that may qualify as BLM significant caves because of their biological values. These caves also provide spelunking opportunities, but in 1980 only hiking and horseback riding opportunities were mentioned. The presence of these caves was not considered enough evidence to provide an outstanding opportunity for primitive and unconfined recreation in part because there are other areas in the District where similar caves can be found. This appears to be a form of comparison that is to be avoided per the guidance, and the logic supporting a finding of no outstanding opportunities appears questionable.

Painter Ranch OR 015-07: This 10,555-acre unit was documented by BLM to not have natural characteristics due to its relatively high amount of human intrusions. Vegetative screening has increased since 1980, but the intrusions are still considered to have a dominating effect, so no additional analysis needed to be conducted as specified by the guidance. Photographic documentation illustrating the unnatural quality of the entire unit would have been very helpful to support the narrative.

Wardell Well OR 015-08: The 9,823-acre unit is also a part of ONDA's larger Moonlight Butte Proposed WSA, which BLM has documented is actually several smaller units separated by roads. The unit was found to lack naturalness, in part because of the effects of a bordering powerline. This "outside sight" is not normally considered in assessing naturalness, however if it is a major impact on naturalness, an evaluation of its direct effects should be made, according to guidance. The description of this major impact on naturalness seemed somewhat lacking in the narrative, and could be expanded in the future.

Bull Lake OR 015-09: This large, 29,798-acre unit is approximately 10 miles long and 5 miles wide, and is another unit that ONDA provided information on, including it in their Moonlight Butte Proposed WSA. BLM provided road documentation supporting the finding that the Proposed WSA is actually divided into smaller units. BLM found the unit to be in a natural condition, but lacking in outstanding opportunities for solitude or a primitive and unconfined type of recreation. Vegetative screening has increased over the years in the northern half of the unit that has rolling topography, but the south half is flatter with less vegetative screening. The large size of the unit could possibly contribute to opportunities for solitude, but that does not seem to have been given much consideration in the 1980 inventory. The solitude narrative regarding a finding of a lack of outstanding solitude relies on what the finding was in 1980. The primitive and unconfined recreation narratives appear to rely somewhat on a statement that the opportunities are similar to those available throughout the surrounding public lands, which is a form of comparison to other areas which the guidance indicates should be avoided.

Saunders Rim Evaluation Area

Nub OR 015-067: This 6,910-acre unit is a part of a larger 58,306-acre ONDA Saunders Rim Proposed WSA, that BLM has documented is actually several smaller units separated by roads. BLM adequately documented this unit to be in a natural condition but to lack outstanding opportunities for solitude or a primitive and unconfined type of recreation.

Saunders Rim OR 015-065: A part of ONDA's larger proposal, this is a 25,868-acre unit that the inventory documented to be a combination of two historic units, 1-65 and 1-66, that are no longer separated by a road, since the former road has changed in character since 1980. The area was found to be in a natural condition, but despite the varied topography of the unit and its larger size, it was not found to have outstanding opportunities for solitude. The lack of outstanding solitude finding relies heavily on the readily visible powerline that affects two thirds of the unit. This appears to conform to the guidance which states that consideration of outside sights and sounds for the solitude analysis should only be made if these impacts are pervasive and omnipresent, however if this is the case, a stronger narrative describing this impact could have been included, along with photographic documentation illustrating the dominance of the powerline over two thirds of the unit.

Twin Butte OR 015-064: This is a large, 23,274-acre unit, also a part of the ONDA proposal, but separated from their larger unit by a documented road. It was found to be in a natural condition, but lacking in outstanding opportunities for solitude or a primitive and unconfined type of recreation. This is a large roadless unit in which the solitude narrative relies on a finding that the traffic on remote boundary roads, and traffic on the even more remote internal motorized routes and cross-country motorized access, and its associated noise and possibility of human encounters, diminishes the solitude experience. It seems unlikely that this noise, from what is likely to be very occasional motorized travel, would eliminate all opportunity for an outstanding opportunity for solitude in such a large, diverse unit. In future wilderness characteristics inventory efforts, this point should be considered.

Sucker Creek Evaluation Area

Coleman Rim South OR 015-120A: This 7,143-acre unit was found to have wilderness characteristics. The area was found to lack wilderness characteristics in 1980, but since then juniper screening has increased to a point where the human developments are substantially unnoticeable and the unit now meets the naturalness criterion. This increase in screening is now documented to provide an outstanding opportunity for solitude, but photographic documentation to support this narrative and the naturalness narrative would have been helpful. No outstanding primitive and unconfined recreational opportunities were found. The narrative describes some opportunities adequately, but then discounts them because currently, most recreational use is via motorized access. This current use

does not necessarily mean there is not an opportunity for primitive and unconfined recreational uses within the unit. Supplemental values were documented to be present.

Coleman Rim Northwest OR 015-0000: This 1,977-acre unit was documented to not meet the minimum size criterion.

Coleman Rim Southwest OR 015-0000: At 1,349 acres, this small unit was also documented to not meet the minimum size criterion.

Coleman Rim North OR 015-120B: This small 5,032-acre unit was found to meet the naturalness criterion, but did not have outstanding solitude opportunities nor outstanding opportunities for a primitive and unconfined type of recreation. Lack of screening and small size were the major factors influencing the lack of outstanding opportunities.

Tucker Hill Evaluation Area

Tucker Hill OR 015-116: This 8,300+ acre unit was found in both the initial inventory and the recent inventory update as not being natural in character. The narrative identified a large crested wheat grass seeding and other grazing related intrusions. The Red Knoll ACEC (cultural) also partially extends into the unit. An on-site visitation by the team identified substantial impacts that had they been described more intensively with accompanying photo documentation would have clearly established the lack of naturalness in the unit. This unit is a good example of expanding photo documentation of the unit as a whole rather than concentrating on vehicle routes.

West Orejana Evaluation Area

Monahan Lake OR 015-054: The entire 8,655 acres of this unit were found to lack naturalness due to the presence of numerous water developments and primitive motorized routes. This finding could be better supported by the inclusion of photographs documenting these impacts. The remaining characteristics were not analyzed, as provided for in the guidance.

Pickett Spring OR 015-055B: This 5,193-acre unit is within ONDA's 462,828 Buzzard Creek Proposed WSA, but BLM has documented the presence of roads that split the proposal into smaller areas. The size of this unit was 10,760 acres in 1980, but the narrative does not explain why the unit is smaller now. It was found to be in a natural condition in 1980, but now the intrusions are considered to be substantially noticeable, disqualifying the area from further consideration for outstanding opportunities. The naturalness narrative does not clearly explain how the smaller area became less natural over time. Photographs depicting the unnatural character of the area were not included, and would have been helpful to support the finding.

Egan Cabin OR 015-075: This 6,114-acre unit was found to have wilderness characteristics. This unit has changed since 1980, because a new primitive recreation opportunity was identified, providing for a finding of outstanding opportunities. Boulder climbing on unique rock formations was the newly identified primitive recreational opportunity. The ID team altered the Form 2 for the solitude narrative by adding a box "Unknown", and checked that because they could not reach a decision. The team needed to reach a finding on the presence or absence of outstanding opportunities for solitude for inventory completeness and subsequent planning and project analysis purposes.

Steamboat Point OR 015-076: At 20,674 acres, this is a relatively large unit. It was found to be in a natural condition. The unit is about 10 miles long by 4.5 miles wide, except in the northern end where it is about 2 miles wide. The northern end was not found to have outstanding opportunities for solitude because of the fairly narrow configuration. The finding that the remainder of the unit also does not have outstanding opportunities for solitude seems somewhat questionable, since the dimensions are roughly 5 miles long by 5 miles wide and some topographic screening is available. Photographs could have supported the narrative findings for solitude and naturalness, but were not included.

Juniper Canyon OR 015-077: This unit is 13,533 acres, and was found to not have wilderness characteristics. The unit was found to be unnatural in the earlier inventory based in part of the presence of a cabin. This was found to be an inventory error, since the cabin was on private land and not included within the unit, so the finding in the current inventory is that naturalness is present. The area was found to lack outstanding opportunities for solitude in part because of "access potential;" however that potential is not explained. Even though the 1980 inventory mentioned access potential as a disqualifying factor, it does not appear to be a valid consideration in determining whether or not the area offers an outstanding opportunity for solitude.

Sunrise Canyon OR 015-090: At 5,541 acres, this unit was found to lack wilderness characteristics. This is a long, narrow and relatively small area whose numerous intrusions disqualify the area for the presence of naturalness, and the remaining characteristics were not analyzed in conformance with guidance.

Northwest Warner Valley OR 015-091D: Although in a natural condition, this 5,841-acre unit is relatively small with minimal topographic and vegetative screening. Opportunities for solitude and primitive and unconfined recreation were found to not be outstanding.

Northeast Warner Valley OR 015-092: The 6,493-acre area was found to lack wilderness characteristics. The narratives adequately describe why this relatively small, flat, lightly vegetated unit is in a natural

condition, but lacks the other wilderness criteria. Photographic support could have illustrated the field conditions and would have provided support to the narrative.

APPENDIX D

Lakeview District Major Observations of the Field Review

July 14, 2015 - Hart Mountain Southeast Evaluation Area

Todd Forbes, Dave Mermejo, Dave Harmon

Guano Lake OR 015-135: We traveled north along the eastern boundary road. The district dropped a northern portion for lack of naturalness and then properly evaluated the rest of the unit, but did not clarify whether the 15,035 acres is the acreage before or after the exclusion of the unnatural portion (probably after). It is generally flat with low-lying vegetation, and the western boundary at the foot of the escarpment was plainly visible. The finding of a lack of outstanding opportunities was supportable, due mainly to the lack of topographic screening.

Lone Grave Butte South OR 015-134C: We drove northwest along the boundary road separating this unit from Lone Grave Butte North to its terminus at the Hart Mountain Wildlife Refuge boundary fence. The road is marginal, but we did see some faint signs of construction in the form of a few areas where lines of rocks had been pushed aside by a blade long ago. Construction had been documented in the 1980 inventory for this road. Relatively regular and continuous use was apparent via bare tire treads with low vegetation in the center. The road determination that was critical in separating the two units was justifiable, since it would be maintained if needed to access the Refuge. At 11,831 acres, and given the general low and open terrain throughout most of the unit that limits screening, the finding of no outstanding solitude is justified. ONDA found outstanding opportunities in these areas because they disagreed with the road status, believing it to be a way, due to an apparent lack of maintenance.

Lone Grave Butte North OR 015-134B: We drove to the refuge boundary, and then inspected the western boundary line along the Refuge fence. The District explained that there is no road separating BLM land from the Refuge, since only a rough two-track route paralleled the boundary fence. The units are contiguous with the Refuge, separated only by a fence and the two track route. The Refuge had submitted their wilderness study findings to Congress in 1974 as required by the Wilderness Act, and found that the portion contiguous with the BLM land did not qualify for a wilderness designation. (At that time, BLM had no wilderness authority under the law.) When the District approached the Refuge to do a joint inventory maintenance update, they declined as they were occupied with a Sheldon Refuge issue, but provided their files to BLM for use in the project. The District could not make a finding for the Refuge on lands they did not administer, so confined the inventory to the BLM side, while acknowledging that the roadless areas continue onto the Refuge. In the future, perhaps in a couple of years, the Refuge personnel may be ready to update their wilderness information, and at that time, it would be appropriate for BLM to update the inventory information for the Lone Grave units.

These could then be considered as larger units with the contiguous Hart Mountain Refuge roadless area. This approach is appropriate, as BLM should maintain its wilderness characteristics inventories as necessary, and when changing conditions warrant.

Lone Grave Butte North is 19,587 acres and was found to be natural, but lacking outstanding opportunities for solitude and primitive recreation. The unit has lots of topographic variation, including "...broken rims and canyons scattered across the northern end of the unit." Lone Grave Butte, at 6,592 feet in elevation, dominates the landscape in the southern part of the unit, and is within the unit. Although its open slopes are visible from the southern boundary roads, there is a low rim that is close to and parallels Road 6176-00, which screens the view of the Butte and its surroundings from travelers on the road. The finding that outstanding opportunities for solitude are lacking should be revisited in future inventory efforts.

July 15 - Tucker Hill Evaluation Area

Todd Forbes, Paul Whitman, Dave Mermejo, Dave Harmon

Tucker Hill OR 015-115: We visited this 8,320-acre unit on its eastern boundary. It had been found to lack the naturalness criterion throughout the unit. The old seeding now appears to be in a more natural condition than when the inventory was conducted in 2011, but the overall findings and documentation of the inventory conditions including the mining and structural influences on naturalness were valid. An ACEC that was established for cultural purposes (not for historic mining purposes) overlaps the unit. Snow fencing associated with a grass seeding study was erected before the inventory maintenance occurred and was not mentioned in the naturalness discussion of the inventory. It could have been mentioned as an additional impact on naturalness.

Coyote Hills Evaluation Area

Coyote Hills OR 015-110, East Coyote Hills OR 015-111: We traveled south along the eastern boundary road of East Coyote Hills, which is a 20,662-acre unit. The entire unit had been found to be unnatural due to the presence of drilled seedings following fire, and evidence of mining activity. The seeding we observed was located along the length of the eastern boundary road. It was no doubt more apparent as unnatural when the inventory maintenance was conducted in 2010, but now the seeding looks relatively natural to the average person. We then traveled along the southern boundary road to the area of concentrated mining activity to the south of a private inholding and then returned to the eastern boundary road. This road also forms a boundary to the adjacent Coyote Hills unit to the west, and we were able to view some of its southeastern portion.

The combined effects of the mining and seeding in East Coyote Hills had been used as evidence that the entire unit did not meet the naturalness criterion. When the inventory is updated in the future, the unnatural portion surrounding the concentrated mining activity in the western portion of East Coyote Hills could possibly be excluded via a point-to-point boundary. The remainder of the unit, which would be well over 5,000 acres, could then be evaluated for outstanding solitude and primitive and unconfined recreation. The situation is different in Coyote Hills, where human impacts were scattered throughout the unit, making it impossible to exclude an unnatural portion.

Rabbit Hills Evaluation Area

Horseshoe Rim OR 015-087, Sunstone Mine OR 015-088: We traveled north along the boundary road that separates Horseshoe Rim from the adjacent Sunstone Mine unit to the east. The boundary road had been contested by ONDA as being a way, however there was evidence of construction in the form of berms, with bare treads and low centerline vegetation as evidence of regular and continuous use. In addition, BLM would authorize maintenance of the route in the future if weather conditions require it. In order to qualify for the maintenance requirement for the wilderness road definition, maintenance need not be conducted on the entire route, but only on those portions necessary to ensure continued relatively regular and continuous use.

We discussed why the rocky Horseshoe Rim formation wasn't significant enough to be considered an outstanding opportunity for primitive and unconfined recreation. It does afford some bouldering and scrambling opportunities, but these are not outstanding.

Discussion was held regarding that in future inventory maintenance activities, photo documentation to support the narratives for naturalness and solitude should be included with the published reports, to better support the findings of each narrative. Although photos are required in the inventory guidance, the guidance does not specifically mention what the photos should illustrate. Photos of route conditions and water developments adjacent to the routes were taken, but typically there were no or very few photos of the surrounding landscape.

Discussion was also held over the importance of considering not only vegetative and topographic screening as it relates to opportunities for solitude, but also the influence of large size on the opportunities for solitude. In future wilderness maintenance efforts, consideration should be given to the effects of the relatively large size of the 15,021-acre Horseshoe unit, combined with its topographic screening in the center of the unit, on the possibility for the presence of outstanding opportunities for solitude.

The Sunstone Mine unit had been found to be completely unnatural, with the inventory record indicating the unnatural features were concentrated in the center of the unit. In the future when

wilderness maintenance activities occur, consideration should be given to deleting the unnatural portion and continuing the inventory on any remaining blocks of natural landscape if there are any that exceed 5,000 acres.

Cox Canyon Evaluation Area

Rehart Canyon OR 015-037: We travelled along the eastern boundary road heading north to a newly bladed route, and then returned along the boundary road back to the south. The entire 31,398-acre unit was found to lack naturalness, due to a combination of motorized routes, water developments and other impacts on naturalness. An interesting canyon was observed that could provide topographic screening, however since the area was not natural, no analysis for outstanding opportunities for solitude or a primitive and unconfined recreation was made, which is in conformance with inventory guidance. When future inventory maintenance is conducted, consideration should be given to the possibility of excluding the concentrated area or areas of impacts from the larger unit, and then continuing the inventory on any remaining natural portions over 5,000 acres in size.

Saunders Rim Evaluation Area

Saunders Rim OR 015-065, Nub OR 105-067: We traveled along the south boundary road, near the eastern powerline boundary, and then drove northwest about 1.5 miles along the boundary road between Saunders Rim and the Nub unit. We observed some evidence of construction and recent maintenance in the form of blade work, but reached a muddy stretch from the recent rain, and had to turn back to the south boundary road. This route divides Twin Butte from Saunders Rim, but we were unable to see that part. The route was contested by ONDA as a way, but the part we observed met the wilderness inventory road definition. Saunders Rim is a large unit at 25,868 acres, but was found to lack outstanding opportunities for solitude. There is some topographic screening in the unit, as noted in the inventory narrative. Solitude opportunities were discounted because of the potential for impacts of noise from motorized travel on the boundary roads and from off-highway vehicle use, but this use is likely to have only a minor effect on solitude.

Twin Butte OR 015-064: This is another large unit found to be in a natural condition and contains 23,273 acres. We traveled along the southern and western boundary roads, and turned back at a point midway along the western boundary. There is some topographic screening in the unit, as noted in the inventory narrative. Solitude opportunities were discounted because of the potential for impacts of noise from motorized travel on the boundary roads and from off-highway vehicle use, but this use is likely to have only a minor effect on solitude. When the inventory is maintained in the future, more consideration should be given to the possibility of the presence of outstanding opportunities for solitude.
