

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

Bureau of Land Management

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Section I Introduction

Purpose

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

How This Document Is Organized

This document is organized in three sections:

Section I provides an introduction and background information on Utah's past planning efforts and explains how public comments collected during the scoping phase for the WSA study process (1999) helped to refine the inventory. The section also contains information on the criteria used to evaluate wilderness character, and summarizes the acres found to have wilderness character within each of the (21) inventory areas on the lands administered by the Monticello Field Office, as originally portrayed in the *1999 Utah Wilderness Inventory*.

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

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

Background

On February 4, 1999, the Bureau of Land Management (BLM) released the *1999 Utah Wilderness Inventory*. Out of 3.1 million public land acres examined statewide (of which 569,190 acres were on lands administered by the Monticello Field Office), 2.6 million

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

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

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

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

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

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

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

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

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

On lands administered by the Monticello Field Office, 569,190 acres were inventoried for the presence or absence of wilderness character. Of the inventoried acres, 484,830 were found to possess wilderness character. Lands with wilderness character were found in 20 of the 21 inventory areas.

Table 1-1 summarizes the wilderness character acres for inventory areas located on lands administered by the Monticello Field Office as presented in the 1999 Utah Wilderness Inventory that was released for public review in February 1999.

Table 1-1: 1999 Utah Wilderness Inventory Findings for the Lands Administered by the Monticello Field Office

Inventory Area	Public Lands Inventoried (Acres)	Wilderness Character (Acres)
Arch & Mule Canyon	13,600	0
Bridger Jack Mesa	27,300	23,500
Butler Wash	3,000	2,000
Cheesebox Canyon	16,080	13,600
Comb Ridge	16,400	14,000
Cross Canyon	2,100	1,400
Dark Canyon	67,400	66,400
Fish and Owl Creeks	28,480	26,410
Fort Knocker Canyon	12,800	12,800
Gooseneck*	3,600	3,760
Grand Gulch	49,570	47,800
Gravel and Long Cyns.	37,100	37,100
Harmony Flat	10,200	10,100
Harts Point*	56,200	16,430

Inventory Area	Public Lands Inventoried (Acres)	Wilderness Character (Acres)
Indian Creek	20,850	19,000
Mancos Mesa	73,900	62,600
Nokai Dome	93,500**	93,500
Road Canyon	13,960	11,850
San Juan River	14,700	14,200
Sheep Canyon	4,700	4,700
Squaw & Papoose Cyn.	3,750	3,680
TOTAL	569,190	484,830

*This acreage reflects only those portions of Gooseneck and Harts Point under the administration of the Monticello Field Office.

** The acreage figure in the *1999 Utah Wilderness Inventory* was computed inaccurately and the correct acreage should have been 94,189. There has been no change to the lands inventoried.

Section II Reevaluation of Inventoried Lands

The thousands of comments that were submitted by the public and BLM’s “internal scoping” process, involving agency review and additional field work, have been extremely helpful in refining the inventory findings to identify the public lands with wilderness character that are subject to consideration in the Monticello RMP Revision. The refined inventory findings identify lands that have wilderness character in each of the twenty inventory areas.

As a result of these internal and external reviews, adjustments have been made to the inventory in 16 of the 20 inventory areas with wilderness character under consideration in the Monticello RMP Revision. The changes can be broken down into four general categories: 1) mapping improvements and corrections; 2) the exclusion of state lands and contiguous federal land parcels too small for WSA consideration; 3) changes in vehicle route cherry-stems and/or roads; and 4) changes in wilderness character findings. Changes are described by inventory area in the sections that follow, and are shown on inventory area maps provided later in this section. Additional details are included in the permanent documentation files available for public review at the BLM office in Monticello, Utah, as well as in the Public Room at the Utah State Office in Salt Lake City, Utah.

Mapping Improvements and Corrections

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

the new wilderness character maps. Most of these changes involve very slight realignments of boundaries of the inventory areas.

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

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

In some cases, the exclusion of state sections has also resulted in the severing of BLM lands that were connected to the wilderness inventory areas only by state lands. A total of 2,281 acres of BLM lands found in 11 different inventory areas were dropped from consideration due to this factor. These inventory areas are listed below along with the federal acres that were severed.

Butler Wash	280 acres
Cross Canyon	7 acres
Dark Canyon	1,370 acres
Fish and Owl Creeks	4 acres
Grand Gulch	110 acres
Gravel and Long	80 acres
Harts Point	244 acres
Indian Creek	137 acres
Mancos Mesa	23 acres
Road Canyon	45 acres
<u>Squaw and Papoose Canyon</u>	<u>6 acres</u>
TOTAL	2,281 acres

Changes in Cherry-stems

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

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

All vehicle routes that meet the BLM road definition used for wilderness inventory purposes have been cherry-stemmed. The Collins Spring Road in the Grand Gulch inventory area is an example of a road cherry-stem. This road provides access from State Road 276 to a popular trailhead used as a starting point for hikes into Grand Gulch. The

road was constructed, is maintained, and receives regular and continuous use by recreationists and others. This road penetrates the inventory area and dead-ends at a trailhead parking area.

In other instances, vehicle routes that do not meet the BLM road definition (vehicle ways), but constitute a substantially noticeable intrusion, have also been cherry-stemmed. The Lavender Canyon vehicle way in the Bridger Jack inventory area is one such example. This route provides access to a constructed trailhead at the boundary of BLM lands and Canyonlands National Park. Much of this route follows an undulating course along a wide wash bottom. At the time of field inventory, construction and maintenance was not evident, and for this reason the Lavender Canyon route was determined to be a vehicle way for wilderness inventory purposes. This way was cherry-stemmed out of the Bridger Jack inventory area because it was determined to be a substantially noticeable intrusion. It is a well-established, signed travel corridor that provides access to a developed trailhead parking area and it receives heavy use for access, parking, and camping. Surface disturbances associated with these uses have substantially impacted natural character.

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

<i>Bridger Jack Mesa</i>	One cherry-stem added; one cherry-stem shortened.
<i>Butler Wash</i>	One cherry-stem removed.
<i>Dark Canyon</i>	Three cherry-stems added; six cherry-stems removed; one cherry-stem shortened.
<i>Gooseneck</i>	One cherry-stem added.
<i>Grand Gulch</i>	One cherry-stem removed.
<i>Gravel and Long</i>	Two cherry-stems removed. One way has been maintained and redefined as a substantially noticeable way that bisects the inventory area into two separate units.
<i>Harts Point</i>	Five cherry-stems removed; two cherry-stems shortened.
<i>Indian Creek</i>	Two cherry-stems removed; one cherry-stem shortened. Two cherry-stems combined into one.
<i>Mancos Mesa</i>	Two cherry-stems added.
<i>Nokai Dome</i>	Seven cherry-stems added; two cherry-stems removed; one cherry-stem shortened.
<i>Road Canyon</i>	One cherry-stem added.

Changes in Wilderness Character Findings

Numerous changes to the wilderness character inventory have been made due to a reevaluation of inventoried lands. Two types of changes have been made: the removal or

addition of large parcels (more than 100 acres) of BLM land, and the removal of small parcels (less than 50 acres) of BLM land due to man-made intrusions that impact natural character.

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

These changes range from the removal of 1,240 acres in Fish and Owl Canyon inventory area and the addition of 8,318 acres in the Harts Point inventory area. The paragraphs below summarize the changes and reasons for these modifications in each of the four affected inventory areas.

Fish & Owl Creeks:

Reduction of 1,240 acres

Approximately 1,240 acres located in the southwest corner of the Fish and Owl Creeks inventory area have been removed from the area with wilderness character because of impacts to natural character associated with extensive woodcutting activity.

BLM's initial inventory of the Fish and Owl Creeks inventory area found 17,000 acres with wilderness character, including lands on Cedar Mesa north of Brushy Flat. In the fall of 1996, inventory crews identified several old seismic lines and three short vehicle ways in this area, but found the intrusions to be substantially unnoticeable.

Scoping comments stated that additional seismic lines and numerous vehicle routes were also present. BLM field crews revisited the area and confirmed much of the information submitted during scoping. A maze of vehicle ways, primarily associated with wood gathering, was found in the southwest corner of the inventory area. Most of the vehicle ways wind through the piñon/juniper woodland that covers this part of the Cedar Mesa Plateau. These routes were not documented during the inventory conducted in the fall of 1996; however, they have existed in this area of the plateau for quite some time. In addition to the vehicle routes, associated impacts such as slash piles from tree limbing were noted over a large area. Due to these impacts, a 1,240-acre area has been found to lack wilderness character. The boundary of the area with wilderness character has been adjusted to exclude portions of the plateau between State Road 261, Snow Flat Road, and a canyon rim.

Gravel and Long Canyons:

Reduction of 111 acres

A 111-acre parcel on Found Mesa has been excluded from the area with wilderness character for the Gravel and Long Canyon inventory area due to a concentration of mining impacts, vehicle ways and other man-made intrusions.

The lands removed from the area with wilderness character involve several abandoned mining prospects located approximately 0.5 miles north of the southern boundary of the inventory area. An old mining route that has been cherry-stemmed accesses the area. During scoping, comments were received that in addition to the road cherry-stem recognized by the BLM, several other vehicle routes and areas of mining disturbance were located in this part of Found Mesa. A review of this information confirmed the existence of several mining adits, and vehicle ways branching from the road cherry-stem.

Upon a field review, the cherry-stem, mining adits, vehicle ways, and a wildlife guzzler, all located in a relatively small concentrated area, were determined to constitute a cumulatively substantially noticeable intrusion on natural character. As a result, an approximately 111-acre area has been excluded from the area with wilderness character.

Harts Point:

Addition of 8,313 acres

Approximately 8,313 acres have been added to the area with wilderness character because they were found upon further review to possess wilderness character.

Most of the Harts Point inventory area does not have wilderness character. Only 18,000 acres out of 63,200 federal acres inventoried were identified as having wilderness character in the *1999 Utah Wilderness Inventory*. The remaining lands (45,200 acres) were found lacking wilderness character due to the presence of numerous roads, seismic lines, drill pads, evidence of past uranium exploration and mining, substantially noticeable vehicle ways, and livestock facilities.

While these man-made intrusions are located throughout the area that was inventoried, the majority of these intrusions are located on the top of the Harts Point Plateau. Several comments submitted during scoping requested that BLM reexamine its determinations in a number of specific locations. With one exception, subsequent review of inventory information in the permanent documentation files and follow-up field evaluations resulted in confirmation of the BLM's original findings.

The exception involves approximately 8,313 acres of public land located along the western slope of the Harts Point Plateau. These lands are formed by a 9-mile swath of canyons and cliffs generally bounded by paved State Highway 211, the upper rims of canyons on Harts Point Plateau, and state land parcels on the north and south. Terrain consists of slickrock benches, dramatic box canyons and a continuous 1000-foot cliff along the western edge of the area that towers above State Highway 211 and Indian Creek. Vegetation varies from isolated stands of piñon/juniper woodland to desert shrub and grass communities. A few springs are found in the area and Hog Canyon supports a perennial stream with cottonwoods, willows and other riparian plant species. Current uses include rock climbing, hiking, camping and cattle grazing. The area retains its natural character due to rugged terrain and limited vehicle access. The upper mesa top, along the east side of the area, gradually drops over a series of tiered slick rock caps to canyon rims. This type of terrain limits vehicle travel to the interior portions of the mesa top. Several private roads accessing the canyon bottoms from State Highway 211 have been closed in recent years, further limiting motor vehicles. The dramatic cliffs and convoluted canyons that twist and turn throughout the area create an environment where outstanding opportunities for solitude are easily found. Outstanding opportunities for primitive recreation such as hiking, camping, and rock climbing can also be found in the area. While this area is not contiguous to other lands having wilderness character, this parcel was found upon further review to possess all the wilderness criteria necessary to qualify as a stand-alone area.

Mancos Mesa:

Reduction of 600 acres

Approximately 600 acres located in the southeast boundary have been removed from the area with wilderness character because it was determined, upon further review, to lack wilderness character because of the cumulative impacts of intrusions from mining.

The inventory field maps showed this area as containing some mining impacts but the file was lacking in photo documentation. Additional field reviews documented the existence of these mining impacts, which were determined to be cumulatively substantial in character. As a result, approximately 600 acres were identified as not being natural in character.

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

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

During the scoping process, additional man-made intrusions impacting wilderness character were identified that resulted in slight boundary adjustments to the wilderness character areas in six of the 21 inventory areas. In nearly all cases, these changes are the result of the identification of man-made intrusions that existed at the time of initial field inventories, but that were overlooked by field crews or imprecisely documented on field inventory maps. However, in two instances slight boundary adjustments are required because of the new construction of a facility in an inventory area. These include a fenced enclosure to protect a riparian area (Cross Canyon inventory area), and a fenced wildlife enclosure (Dark Canyon inventory area). The construction of these facilities was authorized prior to the start of the wilderness inventory. In each instance the amount of land removed from the area with wilderness character is minor - less than five acres.

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

- | | |
|----------------------------|--|
| <i>Cross Canyon</i> | Removal of approximately one acre to exclude a riparian area enclosure. |
| <i>Dark Canyon</i> | Removal of approximately one acre at the end of a cherry-stemmed route to exclude a spring development.
Removal of approximately one acre to exclude a wildlife enclosure along a cherry-stemmed route. |
| <i>Indian Creek</i> | Removal of approximately 2 acres of lands to exclude a line shack, stock pond, and corral. |

- Mancos Mesa*** Removal of approximately five acres to exclude an old highway roadbed along the boundary of the inventory area.
Removal of approximately two acres to exclude an abandoned gravel pit at the end of a cherry-stemmed route.
- Nokai Dome*** Removal of approximately one acre to exclude a windmill at the end of a cherry-stemmed route.
Removal of approximately one acre to exclude an old landing strip adjacent to a cherry-stemmed route.
Removal of approximately three acres to exclude gravel pits at the end of three access routes that have been cherry-stemmed from the inventory area.
- Road Canyon*** Removal of approximately two acres to exclude a stock pond at the end of a route that has been cherry-stemmed from the inventory area.

Summary of Changes By Inventory Area

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

Tips On Using the Maps in this Section

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

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

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

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

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

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

Table 2-1: Summary of Changes by Inventory Area

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
<p>Bridger Jack Mesa (Refer to Map 2.1)</p>	<p>A. This cherry -stem, approximately 0.3 miles in length, removes a substantially noticeable vehicle way and mining disturbance from the area with wilderness character. In combination, these constitute a substantially noticeable man-made intrusion impacting natural character.</p>
	<p>B. The boundary at these locations has been corrected with the use of GPS data.</p>
	<p>C. Approximately 0.5 miles of the Dry Fork Canyon cherry-stem has been removed. The route segment between Lavender Canyon and the natural arch in Dry Fork Canyon is a well-established, heavily used vehicle way that constitutes a substantially noticeable intrusion on natural character. This segment has been cherry-stemmed; however, beyond this point the way becomes less noticeable, very rough, and does not receive regular or continuous use.</p>
	<p>D. This boundary was digitized incorrectly in the <i>1999 Utah Wilderness Inventory</i> and actually follows the section line.</p>
	<p>E. The road separating the land found to have wilderness character from that found not to have wilderness character was incorrectly digitized.</p>
	<p>F. This way has been maintained for OHV (4-wheeler) travel since the 2000 and has severed a portion (~2,000 acres) of the inventory area from the contiguous WSA. The severed parcel is contiguous to land within Canyonlands NP that has been administratively endorsed for wilderness. As a result the parcel continues to possess wilderness character.</p>
<p>Butler Wash (Refer to Map 2.2)</p>	<p>A. Upon field review, this route was found to be a vehicle way (no maintenance, no regular or continuous use) that is not a substantially noticeable intrusion or impact upon the natural character of the area. The cherry -stem on this segment has been removed.</p>
	<p>B. This parcel of BLM land (~255 acres) is separated from the area by a state section and a road.</p>
	<p>C. The boundary at this location was incorrectly portrayed on the Butler Wash map in the <i>1999 Utah Wilderness Inventory</i> due to a mapping error. The lands that were found to have wilderness character are shown in dark yellow.</p>
	<p>D. This parcel of BLM land (~1.5 acres) is separated from the area by a state section and a road.</p>
<p>Cross Canyon (Refer to Map 2.3)</p>	<p>A. This approximately seven-acre parcel of BLM land has been severed from the area with wilderness character by state lands.</p>
	<p>B. This parcel (~1 acres) has been removed from the area with wilderness character because of the recent construction of a fenced enclosure to protect a riparian area. The enclosure was authorized prior to start of the wilderness re-inventory in 1996.</p>
	<p>C. The boundary at this location has been slightly realigned to correct a mapping error.</p>

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS	
<p style="text-align: center;">Dark Canyon (Refer to Map 2.4)</p>	<p>A. After further field review, the cherry-stem on this route has been removed. Most of this route does not appear to have been constructed, nor is it maintained and it does not receive regular or continuous use past the switchbacks.</p>	
	<p>B. This short route spur leading to a stock pond was inventoried and cherry-stemmed on the wilderness character inventory maps, but inadvertently omitted from the Dark Canyon map in the <i>1999 Utah Wilderness Inventory</i>. This cherry-stem has been placed back on the wilderness character map.</p>	
	<p>C. This route was reexamined in 1999 and determined to be a road for the first 0.3-mile segment. This portion of the route has been cherry-stemmed.</p>	
	<p>D. After further field review, the cherry-stem on this route segment has been shortened by approximately 0.5 miles. The portion of the route where the cherry-stem was removed was determined not to be a substantially noticeable intrusion.</p>	
	<p>E. These two parcels of BLM land (~1,133 acres) are severed from the area with wilderness character by state lands.</p>	
	<p>F. After further field review, the cherry-stem on this route has been removed. This route was found to be a vehicle way (no maintenance, and no regular or continuous use past 0.75 miles) that does not constitute a substantially noticeable impact upon the natural character of the area.</p>	
	<p>G. After further field review, the cherry-stem on this route has been removed. This route was found to be a vehicle way (some construction and no maintenance) that does not constitute a substantially noticeable impact upon the natural character of the area.</p>	
	<p>H. After further field review, the cherry-stem on this route has been removed. This route was found to be a vehicle way (some construction and no maintenance) that does not constitute a substantially noticeable impact upon the natural character of the area.</p>	
	<p>I. After further field review, the cherry-stem on this route has been removed. This route was found to be a vehicle way that receives little motorized use and does not constitute a substantially noticeable impact upon the natural character of the area. The permittee verified that this route has become nearly impassable by vehicles and is now accessed primarily by horseback.</p>	
	<p>J. A cherry-stem has been added on a well-established vehicle way that provides access to a series of BLM interpretive sites. This vehicle way, in combination with the signed cultural sites, constitutes a substantially noticeable intrusion that impacts natural character.</p>	
	<p>K. Approximately one acre has been removed from the area with wilderness character to exclude a fenced wildlife enclosure adjacent to the Beef Basin Road.</p>	
	<p style="text-align: center;">Dark Canyon (Refer to Map 2.4)</p>	<p>L. After further field review, the cherry-stem on this route has been removed. This route was found to be a vehicle way (no maintenance and no regular or continuous use) that does not constitute a substantially noticeable impact upon the natural character of the area.</p>
		<p>M. Approximately one acre has been removed from the area with wilderness character to exclude a spring development located at the end of a road cherry-stem.</p>
<p>N. This parcel of BLM land (~137 acres) has been removed because state lands and a road cherry-stem boundary sever it from the area with wilderness character.</p>		

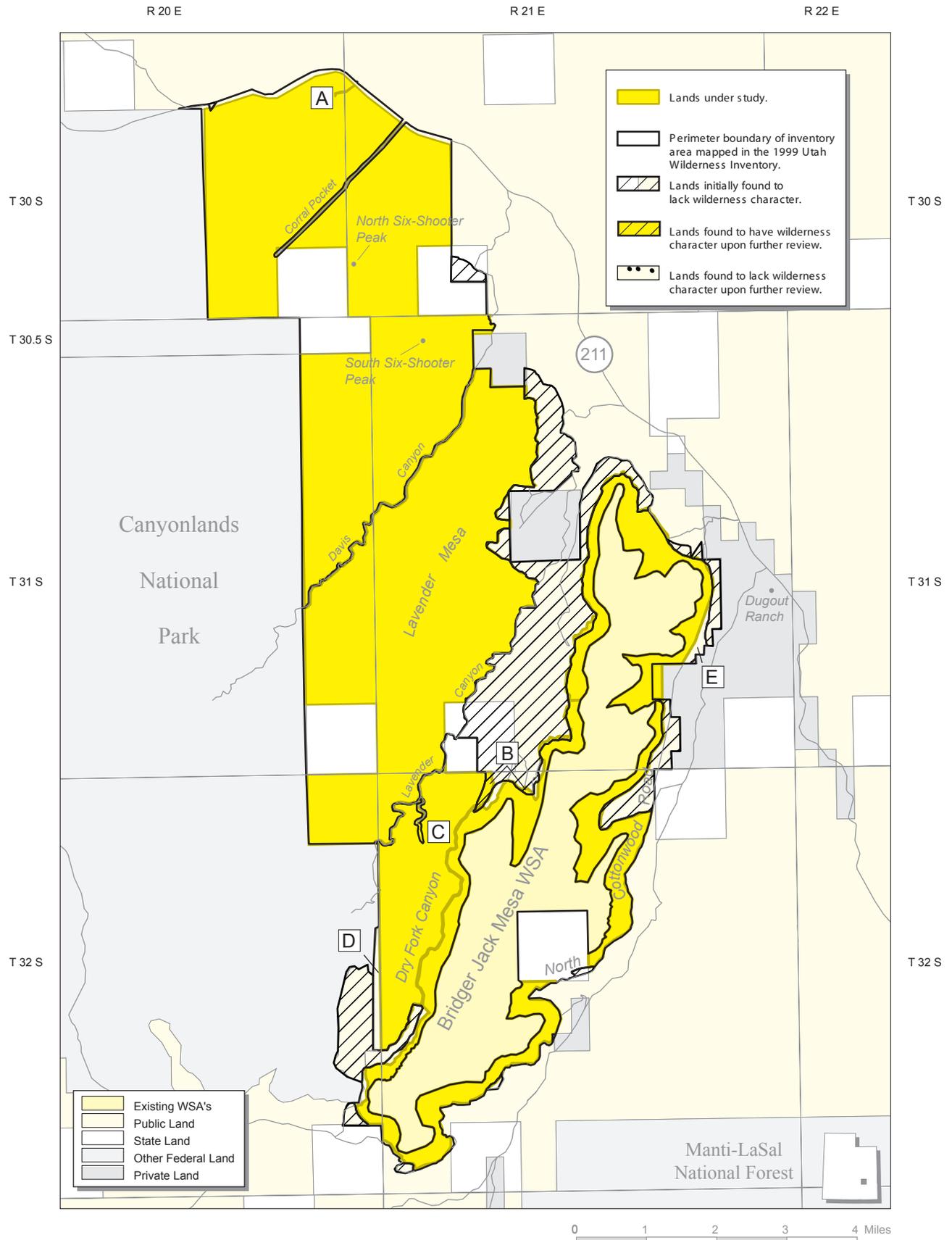
INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
<p>Fish and Owl Creeks (Refer to Map 2.5)</p>	<p>A. Approximately four acres of BLM land has been isolated and removed by the exclusion of state lands from the area with wilderness character.</p> <p>B. Approximately 1,240 acres located in the southwest corner of the Fish and Owl Creeks inventory area has been removed because of impacts to natural character associated with extensive woodcutting activity and other intrusions.</p>
<p>Fort Knocker Canyon (Refer to Map 2.6)</p>	<p>A. The location of a drill pad excluded from the area with wilderness character due to impacts on naturalness has been corrected with the use of GPS data.</p> <p>B. The perimeter boundary at this location has been adjusted to correct a mapping error.</p>
<p>Gooseneck (Refer to Map 2.7)</p>	<p>A. Approximately 82 acres along the south bank of the Colorado River have been added to the area with wilderness character. This area consists of low open bench lands and cliffs along the Colorado River. During the inventory in the fall of 1996, no man-made intrusions that would disqualify the parcel from wilderness consideration were noted. Subsequent checks with BLM personnel familiar with the area confirmed that this parcel does contain wilderness character. The omission of this parcel was the result of a mapping error.</p> <p>B. A 0.6-mile portion of the Chicken Corners Road has been cherry-stemmed.</p> <p>C. The alignment of this road has been corrected with updated GPS data.</p>
<p>Grand Gulch (Refer to Map 2.8)</p>	<p>A. This parcel of BLM land (~110 acres) has been isolated and removed from the area with wilderness character by the exclusion of state lands.</p> <p>B. Upon further review, BLM found that a segment of this route does not appear to have been constructed and is not maintained. Because this segment of the route was determined to be a vehicle way, the cherry-stem has been removed.</p>
<p>Gravel and Long Canyons (Refer to Map 2.9)</p>	<p>A. These three parcels of BLM land (~80 acres) are severed from the area with wilderness character by state lands.</p> <p>B. Because of a concentration of mining impacts, vehicle ways, and other man-made intrusions, approximately 111-acres on Found Mesa have been excluded from the area with wilderness character.</p> <p>C. After reevaluation, two cherry-stems have been removed. These routes are vehicle ways (no maintenance or regular or continuous use) that do not constitute substantially noticeable intrusions on the natural character of the inventory area.</p> <p>D. Minor maintenance has been conducted on this way which has now been determined to be a substantially noticeable way. This has bisected the unit into two separate stand-alone areas.</p>
<p>Harts Point (Refer to Map 2.10)</p>	<p>A. The cherry-stem which extends into Harts Draw has been shortened. A reevaluation determined that the segment that enters Harts Draw is a way (no maintenance or regular or continuous use) that does not constitute a substantially noticeable intrusion on the natural character of the inventory area.</p> <p>B. These four parcels of BLM land (~244 acres) are severed from the area with wilderness character by state lands.</p> <p>C. After reevaluation, cherry-stems have been removed from these three routes. A new finding determined that these routes are vehicle ways (no maintenance or regular or continuous use) that do not constitute a substantially noticeable intrusion on the natural character of the inventory area. These routes originate from private land and have been closed to vehicle access since the early 1990's.</p> <p>D. Upon further review, approximately 8,313 acres have been found to possess wilderness character.</p>

INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
<p style="text-align: center;">Harts Point (Refer to Map 2.10)</p>	<p>E. After a reevaluation determined that this short stub is a way that does not impact the natural character of the inventory area, the cherry-stem has been removed from this short 0.2-mile route.</p>
	<p>F. This route was reexamined in the fall of 1999 and found to be a road for only the first 1.7 miles. After the 1.7-mile mark, the route traverses over a sandstone cap changing to an infrequently used, un-maintained vehicle way. The cherry-stem has been appropriately shortened to exclude only the first 1.7 miles that are a substantially noticeable intrusion to natural character.</p>
	<p>G. Upon further review, a new finding determined that Cherry Two is a way (no maintenance or regular or continuous use) that does not constitute a substantially noticeable intrusion to the natural character of the inventory area. The cherry-stem has been removed.</p>
	<p>H. A 40-acre parcel shown as private land on the Harts Point map in the <i>1999 Utah Wilderness Inventory</i> is actually BLM land with wilderness character, and has been added to the wilderness character map.</p>
<p style="text-align: center;">Indian Creek (Refer to Map 2.11)</p>	<p>A. This short cherry-stem off of the Lockhart Canyon Road has been removed after reevaluation and a new finding determined that this route is a vehicle way (no maintenance or regular or continuous use) that does not constitute a substantially noticeable intrusion on the natural character of the inventory area.</p>
	<p>B. This boundary has been adjusted to correct a digitizing error. The boundary was incorrectly shown in the <i>1999 Utah Wilderness Inventory</i>, and follows the Lockhart Basin Road.</p>
	<p>C. Field evaluation has resulted in minor modifications to the alignment of this cherry-stem, the two routes the cherry-stem encompassed is actually one route.</p>
	<p>D. This parcel of BLM land (~137-acres) has been severed from the area with wilderness character by state lands.</p>
	<p>E. This cherry-stem has been removed after re-evaluation and a new finding determined that this route is a vehicle way (no maintenance or regular or continuous use) that does not constitute a substantially noticeable intrusion on the natural character of the inventory area.</p>
	<p>F. Upon further field evaluation, approximately 2-acres were removed from the area with wilderness character to exclude a line shack, stock pond, and corral that constitute a substantially noticeable intrusion on the natural character of the inventory area.</p>
	<p>G. Upon further field evaluation, the cherry-stem on this route has been adjusted to encompass only the segment that is substantial. The cherry-stem has been removed from a short seismic line that spurs from the main route.</p>
<p style="text-align: center;">Mancos Mesa (Refer to Map 2.12)</p> <p style="text-align: center;">Mancos Mesa (Refer to Map 2.12)</p>	<p>A. This parcel of BLM land (~23-acres) is severed from the area with wilderness character by state lands.</p>
	<p>B. The boundary at this location has been relocated from State Highway 276 to the old highway bed due to impacts on natural character.</p>
	<p>C. This parcel of BLM land (~82-acres) has been removed to exclude existing facilities associated with the neighboring ranch operation that impact wilderness character.</p>
	<p>D. A short spur road and an abandoned gravel pit have been cherry-stemmed. These imprints of man constitute a substantially noticeable intrusion on natural character.</p>
	<p>E. A triangular piece of BLM land (~35-acres) has been severed by a substantially noticeable vehicle way off the main road cherry-stem. This vehicle way constitutes a substantially noticeable impact on wilderness character.</p>

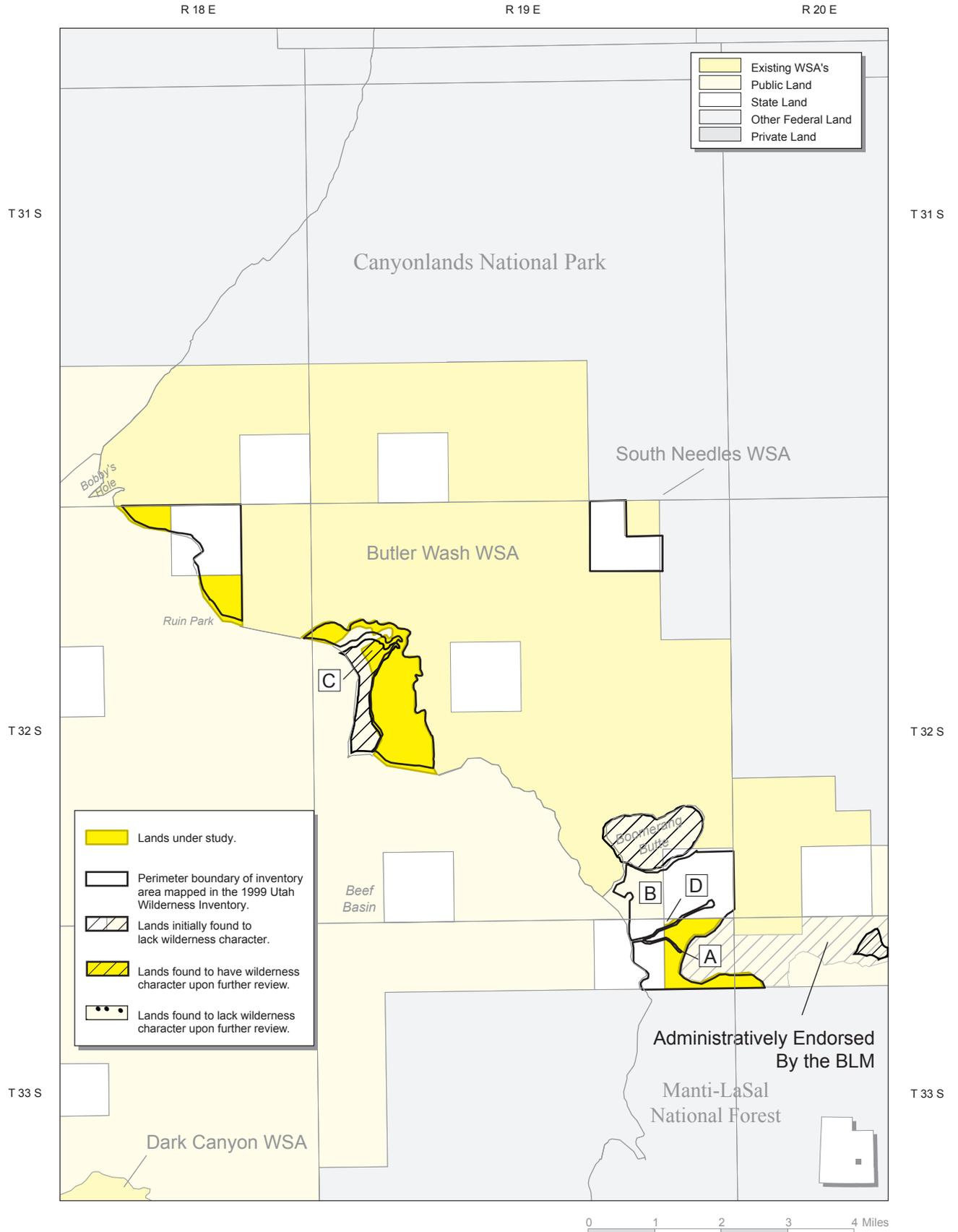
INVENTORY AREA	WILDERNESS CHARACTER MODIFICATIONS
	B. A newly inventoried vehicle way and a large stock pond accessed by this way are substantially noticeable intrusions impacting wilderness character, and have been cherry-stemmed.
<p align="center">Sheep Canyon (Refer to Map 2.15)</p>	A. The cherry -stem along this route has been modified to include a stock pond and small parking area. The stock pond was included within the cherry-stem on inventory maps, but inadvertently omitted from the maps in the <i>1999 Utah Wilderness Inventory</i> . The small parking area accesses the Sundance Trailhead and has been cherry-stemmed because it constitutes a substantially noticeable impact on wilderness character.
<p align="center">Squaw and Papoose Canyon (Refer to Map 2.16)</p>	<p>A. The boundary of the inventory area at this location was incorrectly depicted in the <i>1999 Utah Wilderness Inventory</i> due to a mapping error.</p> <p>B. Approximately six acres of BLM land is severed from the area with wilderness character by state lands.</p>

No modifications to the area with wilderness character were made to the following four inventory areas except for the exclusion of state lands.

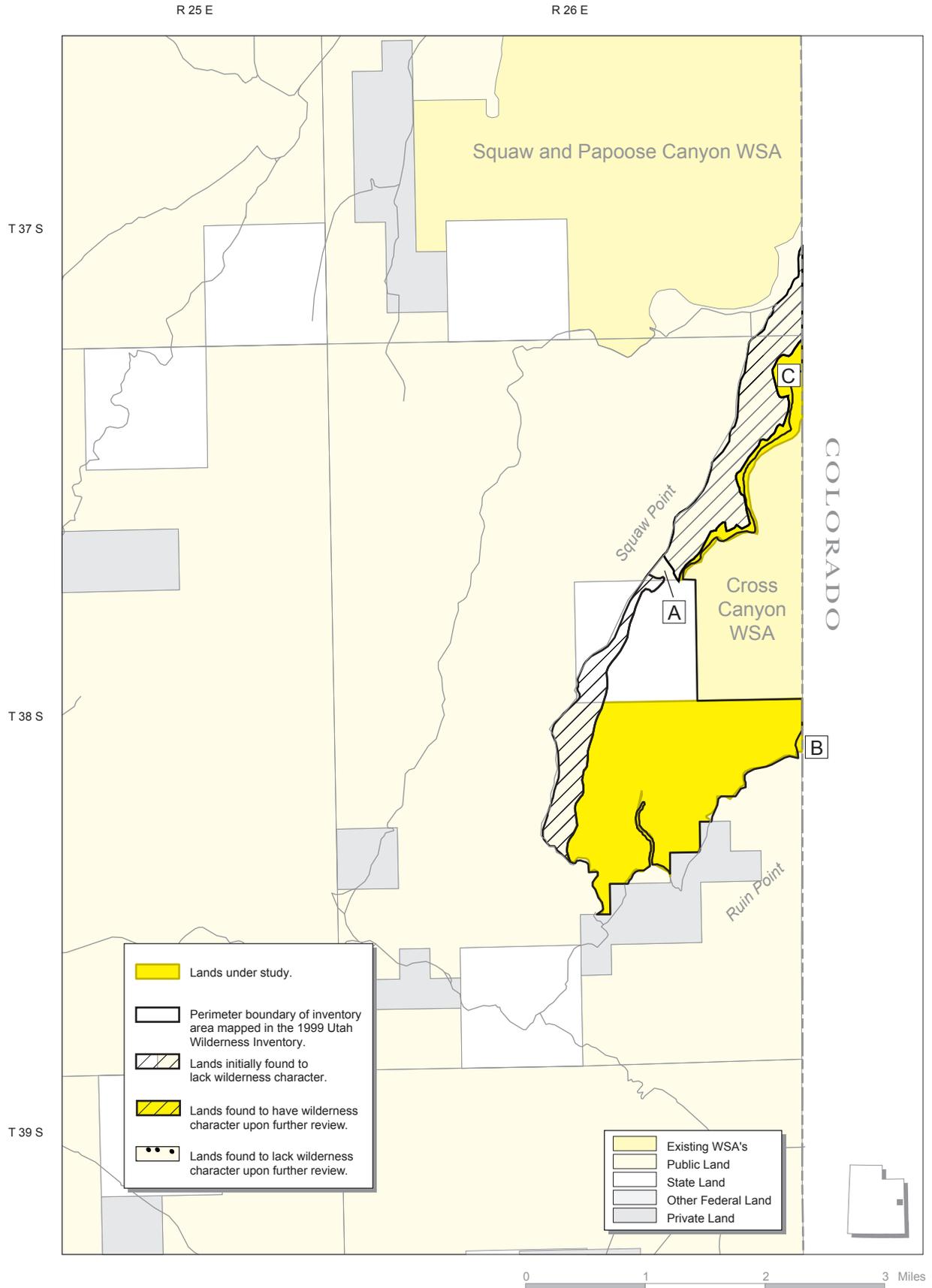
Cheesebox Canyon,
Comb Ridge,
Harmony Flat,
San Juan River



MAP 2.1



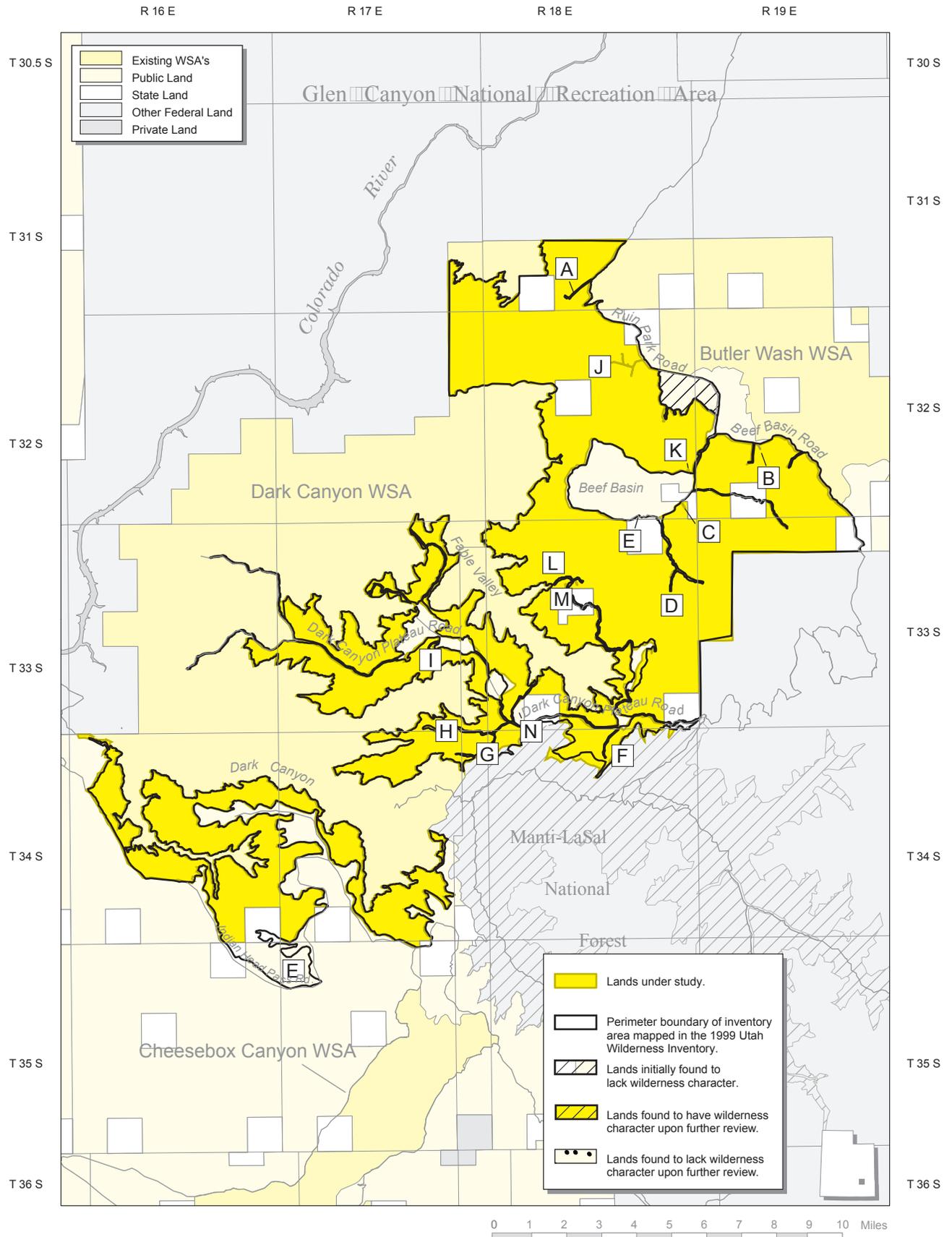
MAP 2.2



MAP 2.3

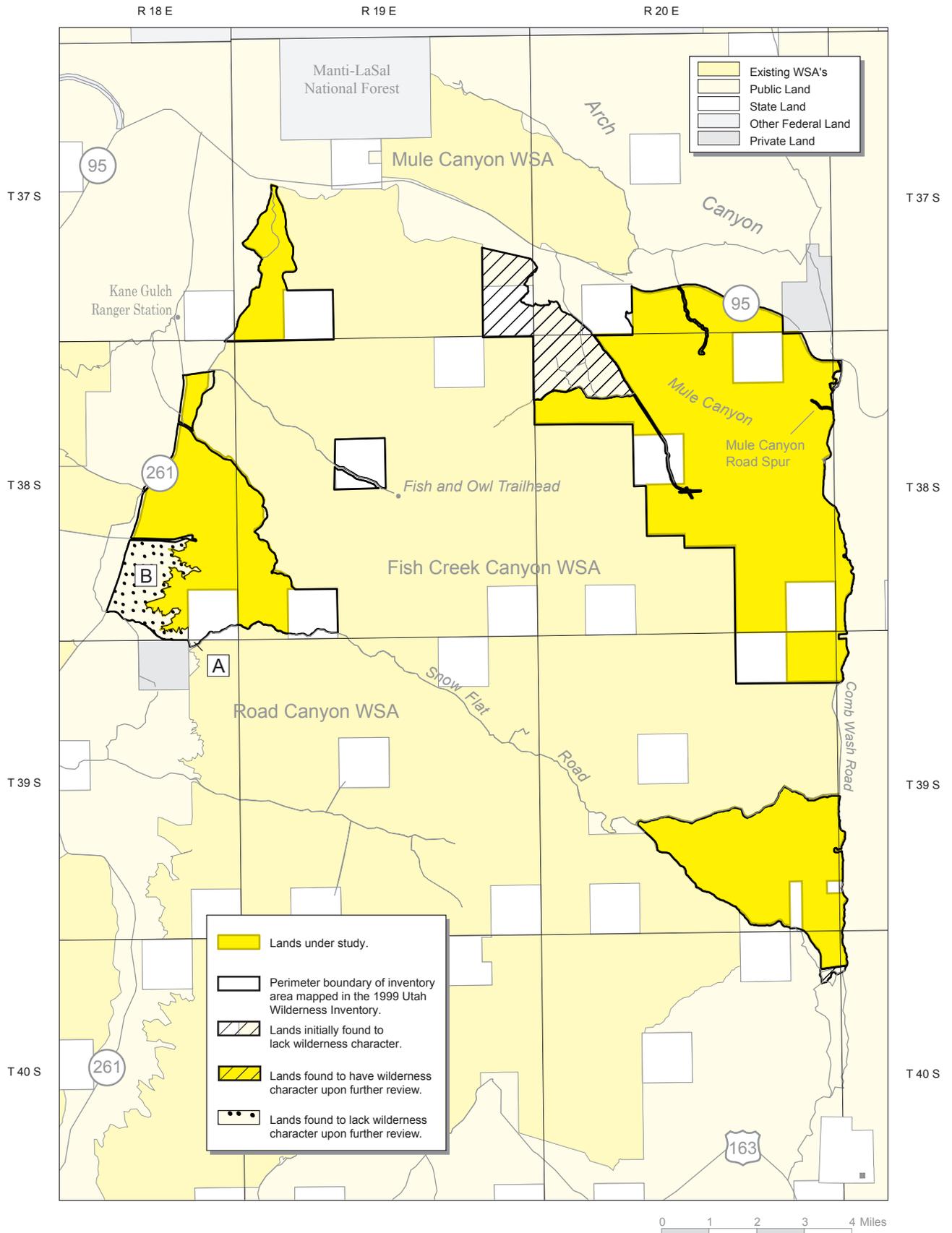
Dark Canyon

Wilderness Character Modifications



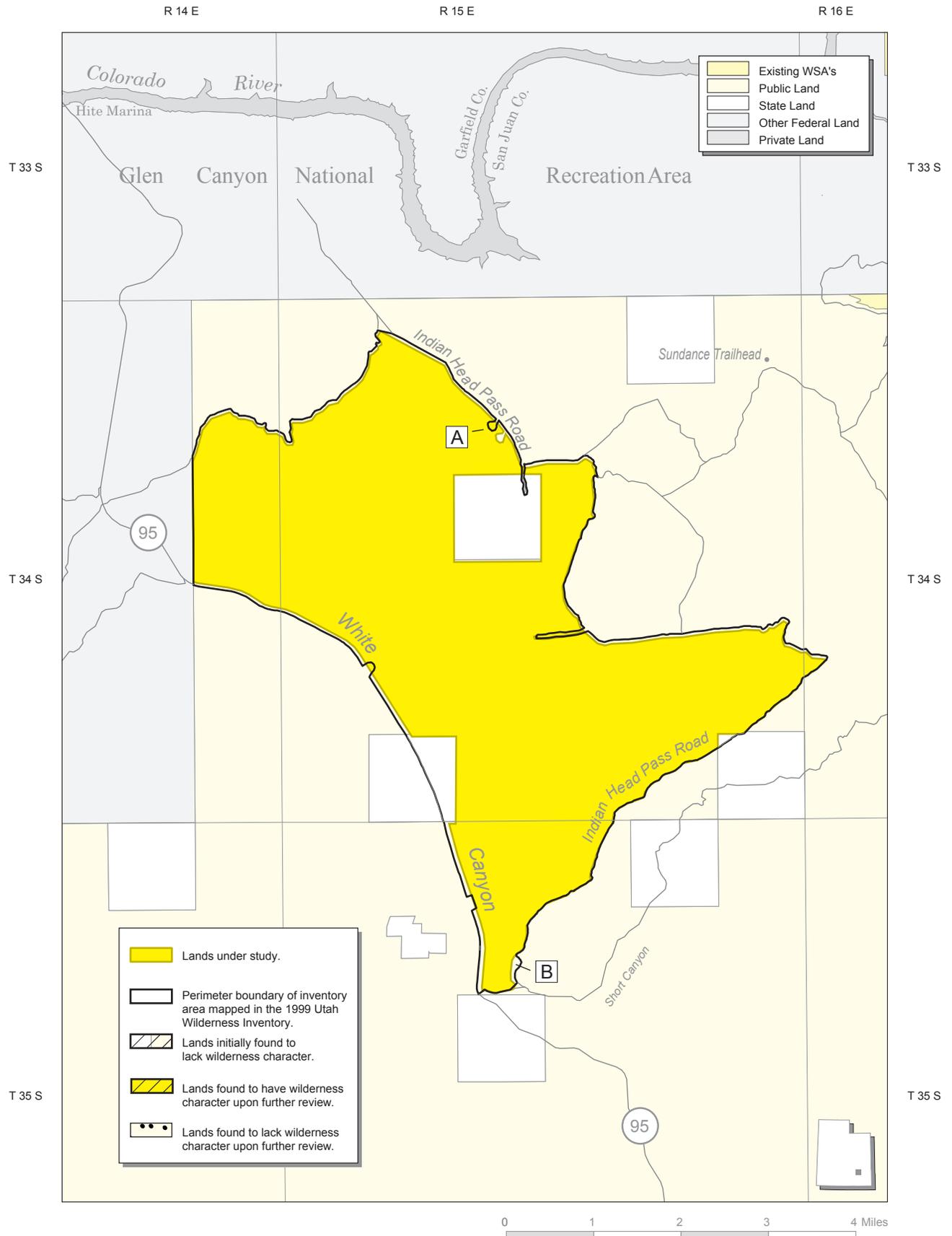
MAP 2.4

Fish and Owl Creeks Wilderness Character Modifications

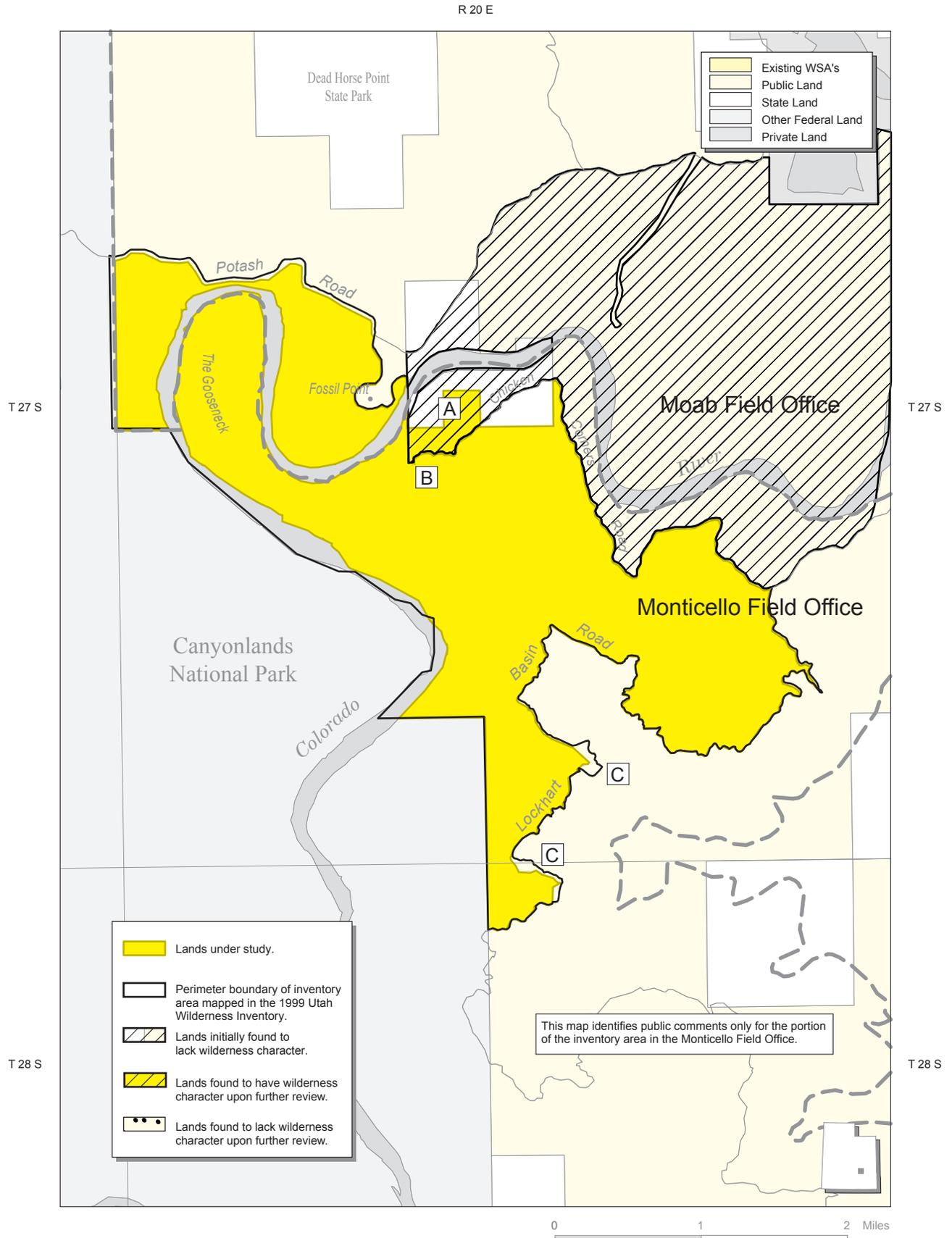


MAP 2.5

Fort Knocker Canyon Wilderness Character Modifications



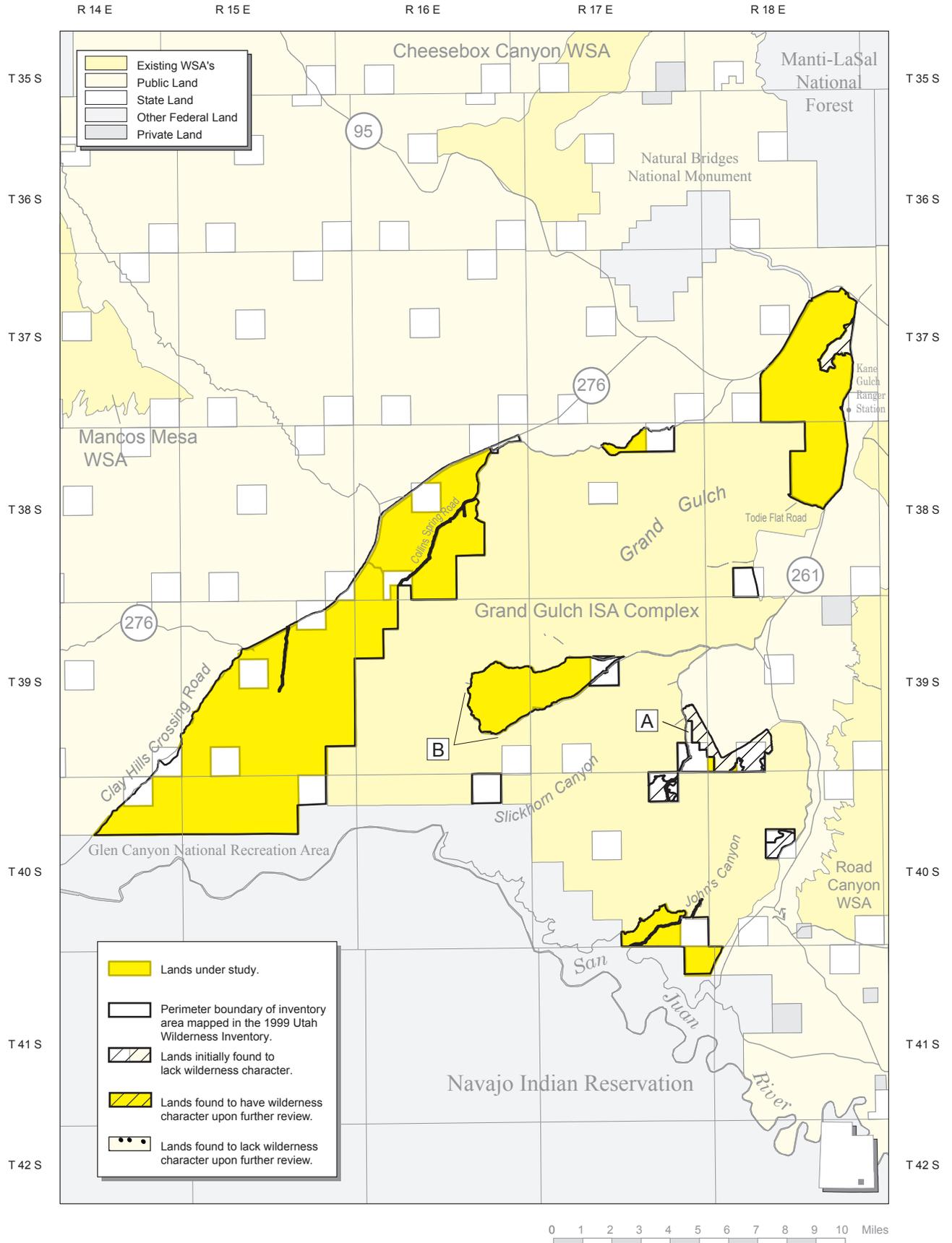
MAP 2.6



MAP 2.7

Grand Gulch

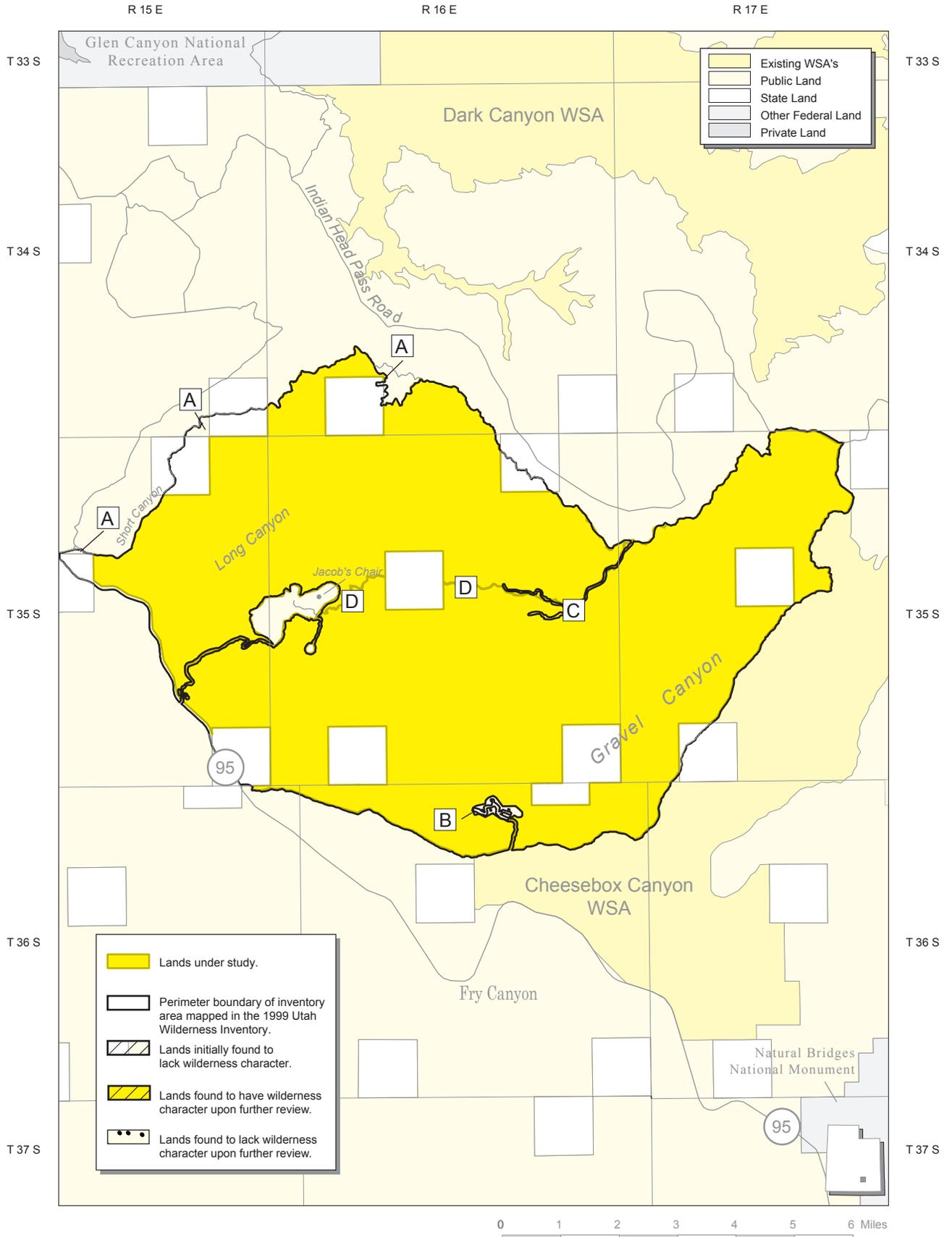
Wilderness Character Modifications



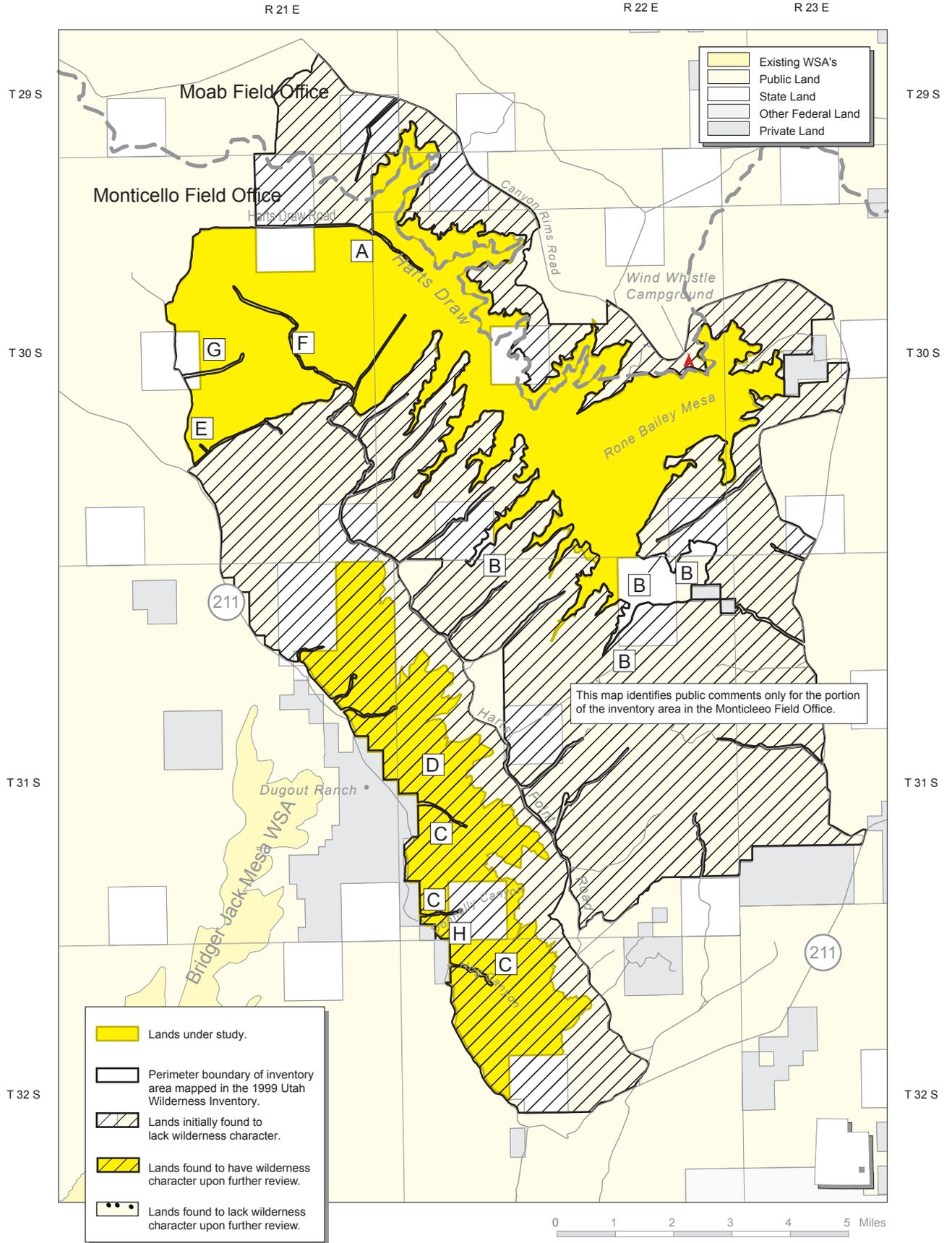
MAP 2.8

Gravel and Long Canyons

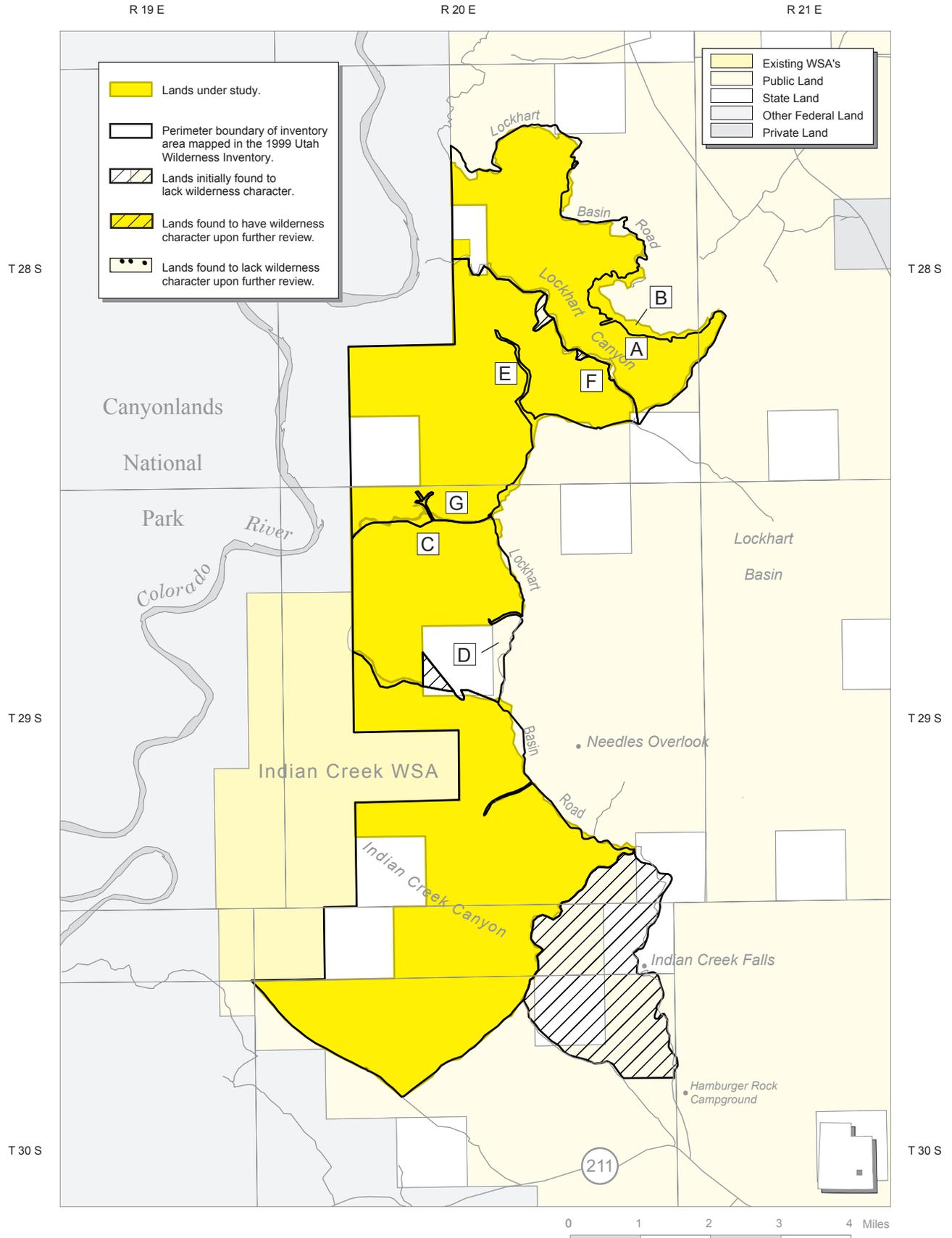
Wilderness Character Modifications



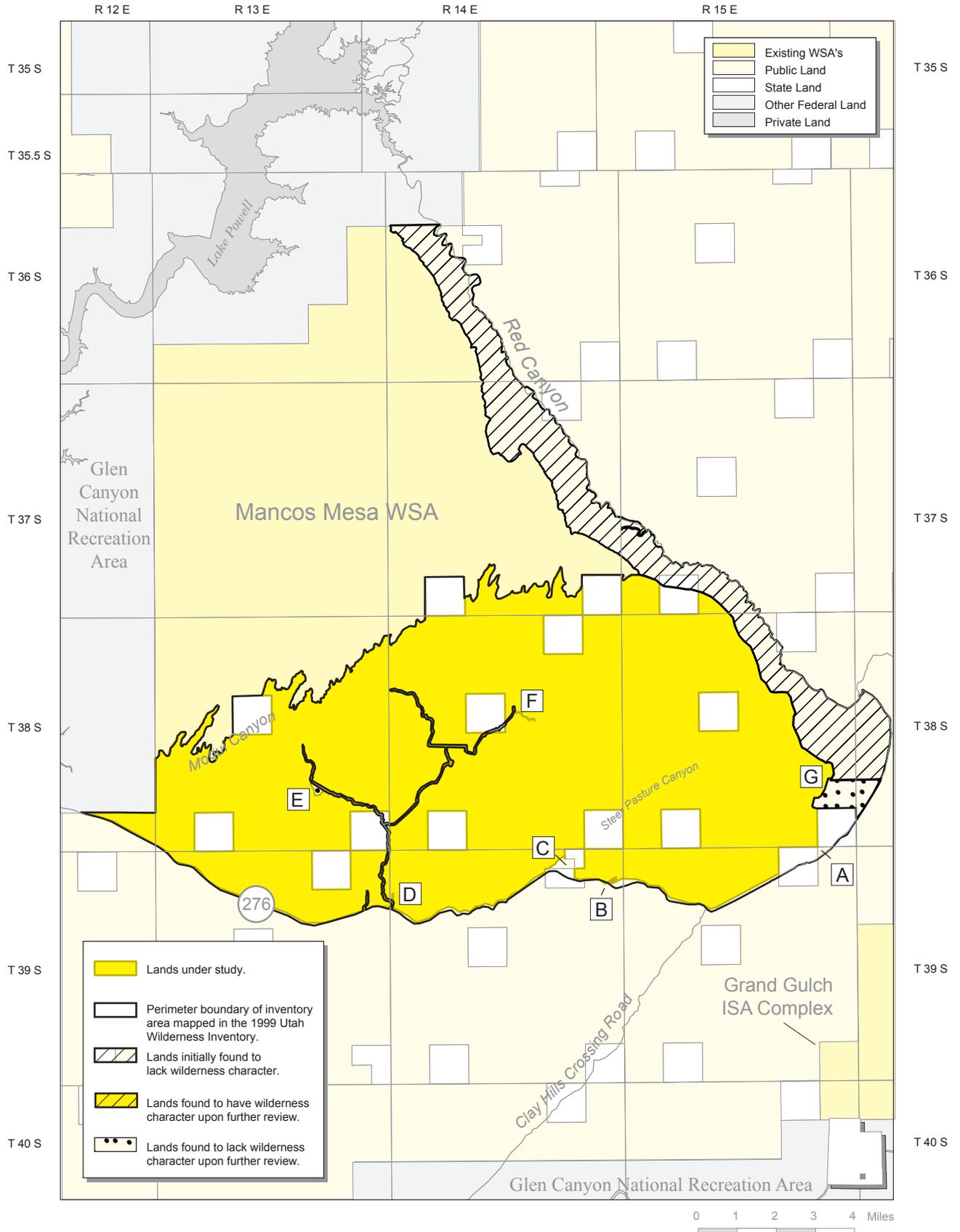
MAP 2.9



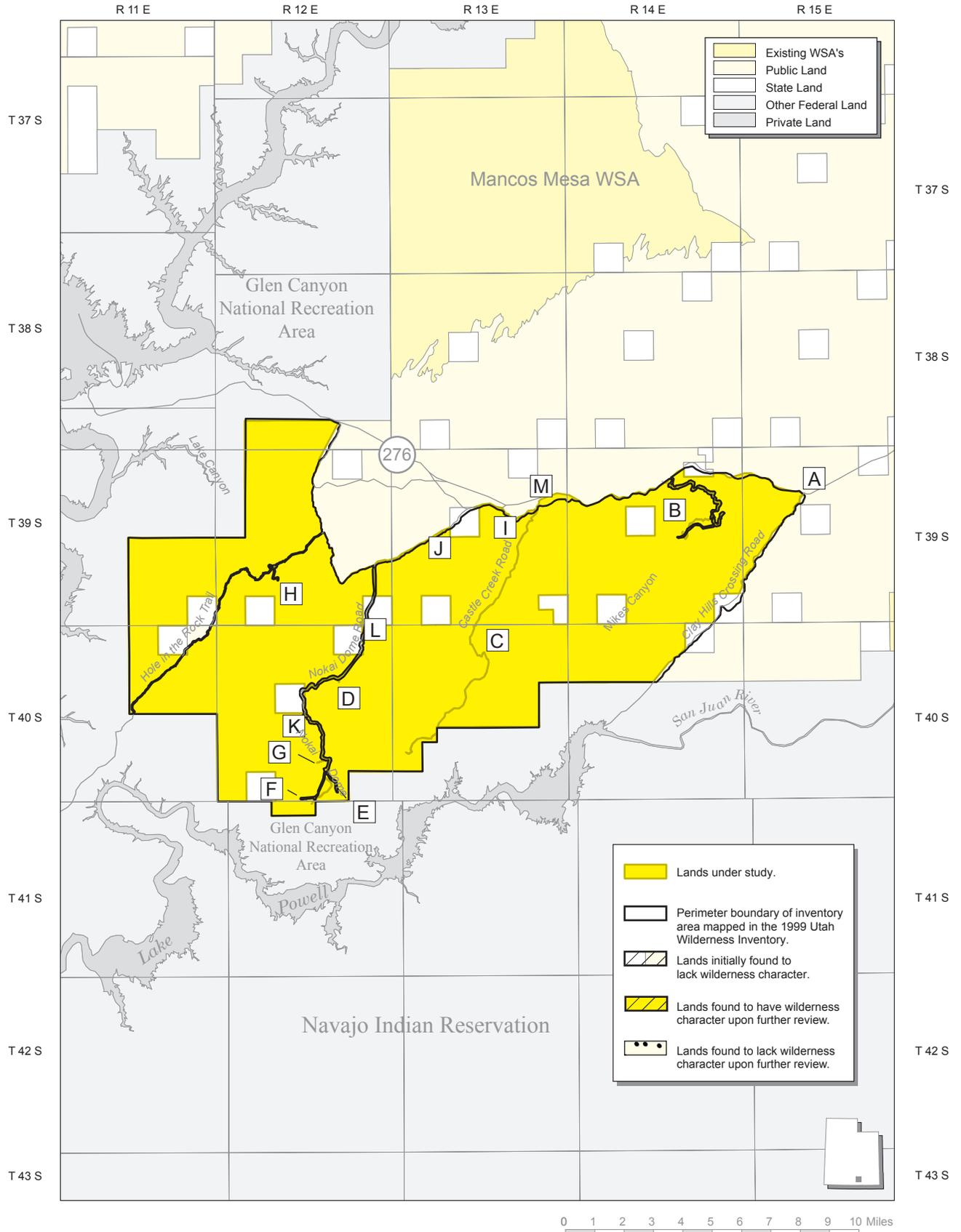
MAP 2.10



MAP 2.11



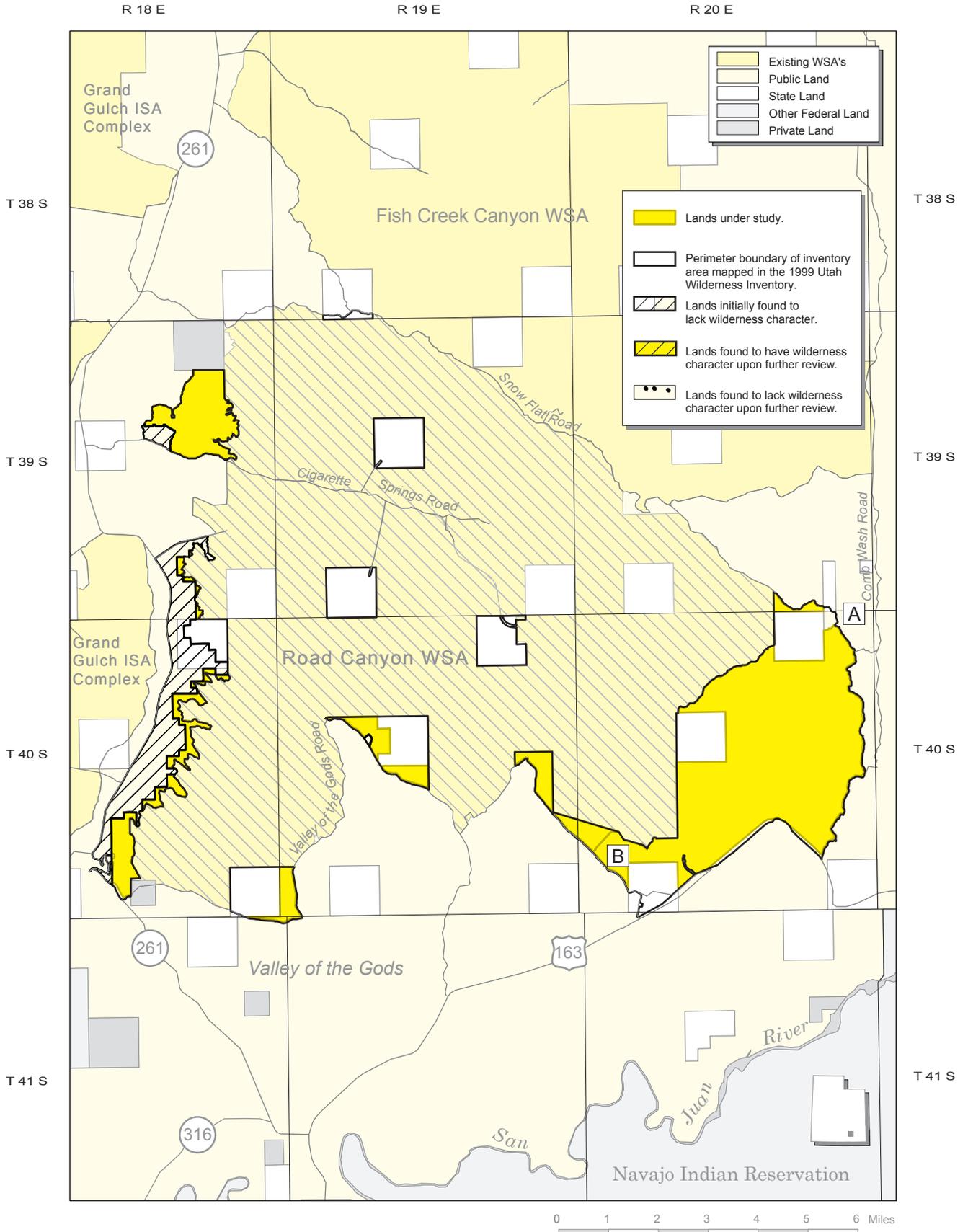
MAP 2.12



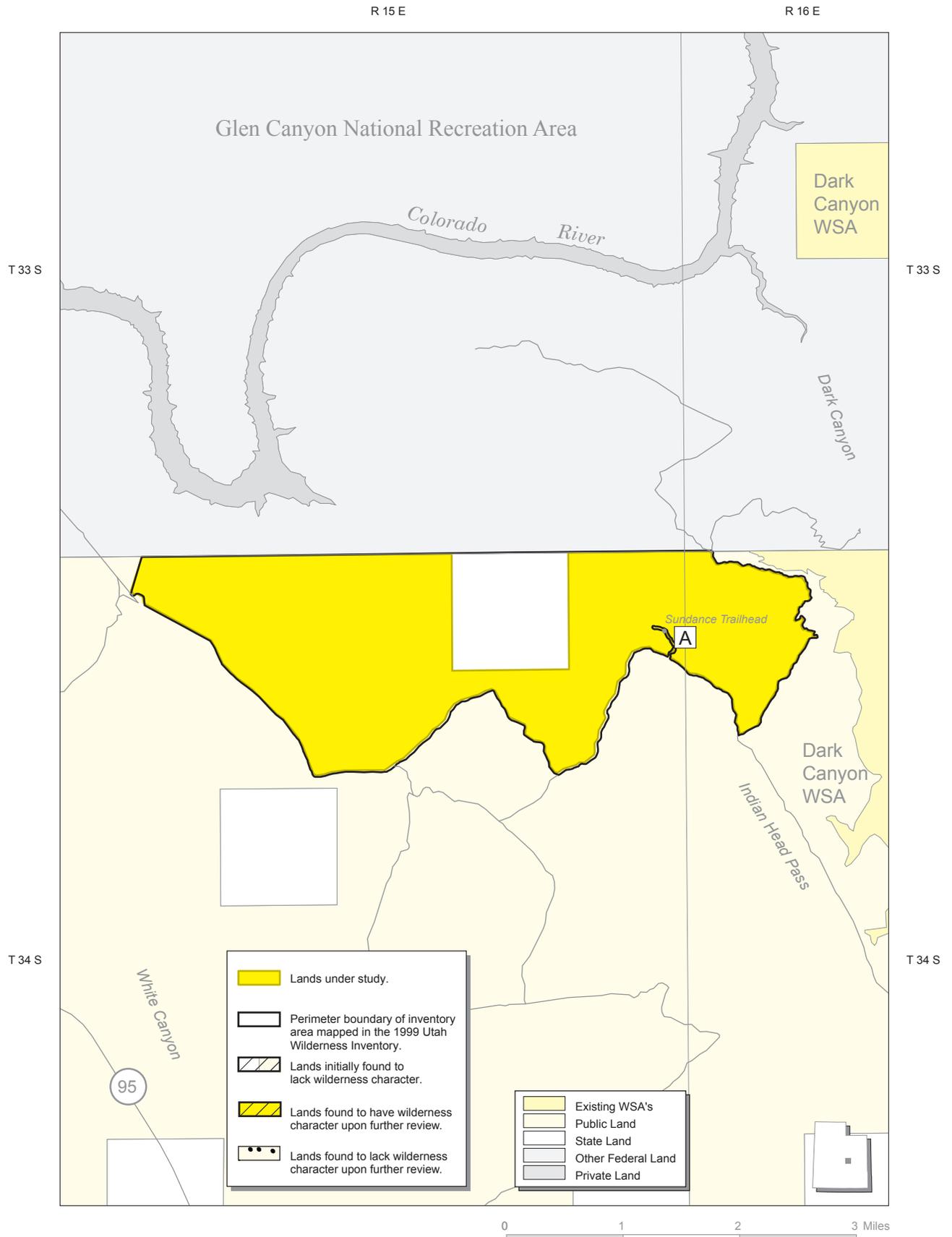
MAP 2.13

Road Canyon

Wilderness Character Modifications

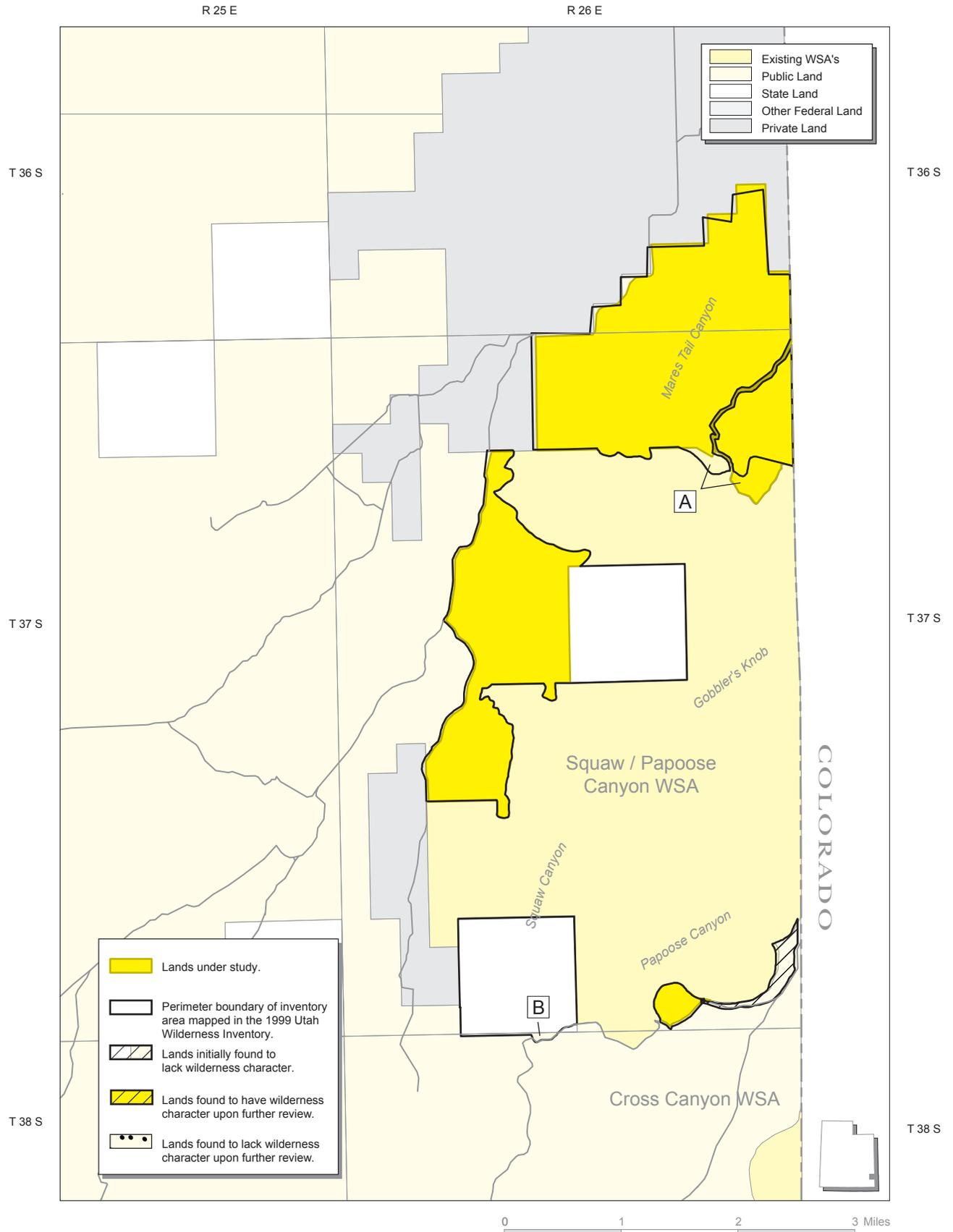


MAP 2.14



MAP 2.15

Squaw and Papoose Canyon Wilderness Character Modifications



MAP 2.16

Explanation of Acreage Summary Table in this Section

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

Table 2-2: Acreage Summary

Inventory Areas	Wilderness Character Acres Identified in the <i>1999 Utah Wilderness Inventory</i>	Revised Wilderness Character Acres
Arch and Mule Canyon	0	0
Bridger Jack Mesa	23,500	23,254
Butler Wash	2,000	1,661
Cheesebox Canyon	13,600	13,244
Comb Ridge	14,000	13,763
Cross Canyon	1,400	1,355
Dark Canyon	66,400	66,325
Fish and Owl Creeks	26,410	24,649
Fort Knocker Canyon	12,800	12,409
Gooseneck*	3,760	3,571
Grand Gulch	47,800	47,109
Gravel and Long Canyons	37,100	36,933
Harmony Flat	10,100	9,660
Harts Point*	16,430	26,214
Indian Creek	19,000	18,937
Mancos Mesa	62,600	62,190
Nokai Dome	93,500**	94,189
Road Canyon	11,850	11,377
San Juan River	14,200	14,338
Sheep Canyon	4,700	3,998
Squaw and Papoose Canyon	3,680	3,568
Total	484,830	488,744

*This acreage reflects only those portions of Gooseneck and Harts Point under the administration of the Monticello Field Office

** The acreage figure in the *1999 Utah Wilderness Inventory* was computed inaccurately and the correct acreage should have been 94,189. There has been no change to the lands inventoried.

Section III: Inventory-Related Scoping Comments and BLM Responses

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

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

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

How was the inventory completed?

Specific steps taken to conduct the inventory included the following:

- The boundaries of the areas proposed for wilderness designation in legislation before Congress in 1996 (H.R. 1500 and H.R. 1745), including the existing BLM WSA boundaries, were transposed onto recent low-level aerial photographs.
- Trained aerial photography interpreters reviewed each photograph and marked them to identify potential human disturbances. Potential surface-disturbance information was transferred from the aerial photographs to 7.5-minute orthophoto and topographic maps.
- The aerial photographs and maps generated in the first three steps were provided to the inventory teams.
- Team members reviewed available information, such as previous wilderness inventory findings.
- Each inventory area was visited. Field checks were made using helicopter flights, driving boundary roads and vehicle ways within the areas, as well as hiking and mountain biking to remote locations. Surface disturbances were examined and documented. The inventory team was equipped with global positioning system (GPS) units, which use satellite technology to determine locations on the ground. The GPS equipment, in concert with current maps and aerial photographs, aided the team in documenting the location of surface disturbances, roads and ways, and photo points.
- Roads or vehicle ways identified in the field were documented on field maps, described on road/way analysis forms, and photographed. This documentation was placed in permanent documentation files for each inventory area.
- Other surface disturbances, such as mining impacts and range and wildlife developments, were also documented on field maps and photographed. This documentation was also placed in each permanent documentation file.
- Each permanent documentation file was reviewed by the field team, the team leader, and in some cases the project leader, and a preliminary finding of the presence and/or absence of wilderness characteristics was made.

- A wilderness inventory evaluation was written for each inventory area and included in each permanent documentation file. The project leader signed them after concurrence with the findings regarding whether or not each area, or portions thereof, had wilderness character.

How was the inventory documented?

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

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

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

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

The BLM's wilderness inventory policy directed teams to use rights-of-way (ROWs) as boundaries of inventory areas. But other valid existing rights, such as mineral leases, are not criteria used in the inventory, unless those uses resulted in impacts on the ground.

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

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

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

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

How were the boundaries of the inventoried lands determined?

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

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

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

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

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

“A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.”

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

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

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

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

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

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

How does the BLM apply the wilderness criterion for size?

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

- Roadless areas with over 5,000 acres of contiguous public lands. State or private lands are not included in making this acreage determination.
- Any roadless island of the public lands of less than 5,000 acres.
- Roadless areas of less than 5,000 acres of contiguous public lands where any one of the following apply:
 - They are contiguous with lands which have been formally determined to have wilderness or potential wilderness values, or
 - It is demonstrated that the area is clearly and obviously of sufficient size as to make practicable its preservation and use in an

- unimpaired condition, and of a size suitable for wilderness management, or
- They are contiguous with an area of less than 5,000 acres of other federal lands administered by an agency with authority to study and preserve wilderness lands, and the combined total is 5,000 acres or more.

How does the BLM apply the wilderness criterion for naturalness?

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

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

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

How does BLM apply the wilderness criterion for supplemental values?

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

How are sights and sounds outside of inventory areas assessed?

Human impacts outside inventory areas were not normally considered in assessing wilderness characteristics. However, if an outside impact of major significance exists, it was noted in the inventory and evaluated for its effects on the inventory area. Human impacts outside an inventory area did not automatically lead to a conclusion that an inventory area lacked wilderness characteristics. Congressional guidance on this issue in House and Senate Reports on the *Endangered American Wilderness Act of 1978* has cautioned federal agencies in the consideration of outside sights and sounds in wilderness studies. For example, in the case of the

Sandia Mountain Wilderness in New Mexico, the House Report (No. 95-540) stated “the ‘sights and sounds’ of nearby Albuquerque, formally considered a bar to wilderness designation by the Forest Service, should, on the contrary, heighten the public’s awareness and appreciation of the area’s outstanding wilderness values.”

Did the inventory designate WSAs?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The tables that follow provide a synopsis of site-specific comments and responses for the 20 inventory areas with wilderness character in the Monticello Field Office (the Arch & Mule Canyon inventory area within the lands administered by the Monticello Field Office was found not to have wilderness character, but is included to provide response to public comments on the inventory area). Many of the comments received during scoping were detailed and specific to a particular place or vehicle route. These comments primarily focused on whether or not a particular location did or did not have wilderness character, or if a specific route should be considered a “road” or a “vehicle way”. A Response to Comments Map is provided for each inventory area (Maps 3.1 to 3.20). Comment numbers are linked to points on the maps to depict the general location of the areas of concern.

*ARCH AND MULE CANYONS (Refer to Map 3-1)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
1	<p>Route L1G is cherry-stemmed beyond where maintenance ends the cherry-stem should be removed.</p> <p>Another comment states that BLM avoids addressing the lack of naturalness by using the route as a boundary.</p>	<p>Upon further review, road L1G was reexamined and determined to be a road as far as the “End of County Maintenance” sign. The remaining segment of the route to the national forest boundary was determined to be a substantially noticeable way. L1G is the boundary of the Mule Canyon WSA and is considered to be substantial boundary.</p>	NO
2	<p>Route L1A is cherry-stemmed, but the road/way form says it is not a road. The cherry-stem should be removed.</p> <p>Another comment states that the BLM avoids addressing issues of lack of naturalness by using the route as a boundary.</p>	<p>Upon further review, L1A was reexamined and determined to be a substantially noticeable way. This way is not a cherry-stem but the boundary separating units 1 and two and actually bisects the inventory area.</p> <p>Because of the narrow confines of Arch Canyon and the amount of visitor use on the way. The area was found not to possess solitude.</p>	NO
3	<p>Two miles of VE1B is very rough and does not meet the road definition. The cherry-stem should be removed.</p> <p>Another comment states that the route should be a road and BLM avoids addressing issues of lack of naturalness by using the route as a boundary.</p>	<p>Upon further review, VE1B was reexamined and determined to be a non-substantial way from the inventory boundary in Comb Wash to 0.75 miles south of Hotel Rock. This determination has resulted in the combining of units 2 and 3 into one unit.</p> <p>Little Baullie Mesa, which occupies much of the unit, is heavily impacted by wood cutting activity and is not natural in character and was found not to have wilderness character.</p>	NO
4	<p>The northern segment of VE1A is a pack trail and not a significant impact. The boundary should be expanded to the east.</p> <p>Another comment states that the route should be a road</p>	<p>VE1A was identified as a road that provides access to and ends at Comb Cave.</p> <p>Upon further review, the route along the eastern boundary of the inventory area was examined and identified as MR-1 and was determined to be a way for approximately 2.1 miles. The remaining segment is a hiking/pack trail. The route is the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i>. The lands to the east are outside the scope of the inventory.</p>	NO
5	<p>No road/way form was completed for this route; the Ute tribe has closed it. Boundary should be expanded to included non impacted lands to the south.</p>	<p>The route is the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i>. The lands to the south are outside the scope of the inventory.</p>	NO
6	<p>San Juan County states that route BL1A, BL1B and BL1C should be determined to be roads.</p>	<p>BL1A, BL1B and BL1C were determined to be a vehicle ways because they do not meet all criteria of the BLM road definition used for wilderness inventory purposes.</p>	NO
7	<p>San Juan County states that route</p>	<p>L-1D is a 0.3-mile spur route that was not</p>	NO

*ARCH AND MULE CANYONS (Refer to Map 3-1)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
	L-1D should be determined to be a road.	constructed, is not maintained, and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	
8	San Juan County states that route L-1E should be determined to be a road.	L-1E is a 0.2-mile spur route that was not constructed, is not maintained, and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
9	San Juan County states that route L-1F should be determined to be a road.	L-1F is a 0.2-mile spur route that was not maintained, and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
10	San Juan County states that route L-1J should be determined to be a road.	L-1J is a 0.3-mile spur route that was not maintained, and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
11	A route identified by San Juan County as SJ104-20 was not recognized as a road.	This route was identified as L1A during the 1999 Utah Wilderness Inventory. It is the substantial way up Arch Canyon.	NO
12	A route identified by San Juan County as SJ104-21 was not recognized as a road.	Seismic lines are noted on the inventory maps in this area.	NO
13	A route identified by San Juan County as SJ104-22 was not recognized as a road.	This route was noted on the inventory maps as a short way.	NO
14	A route identified by San Juan County as SJ104-25 was not recognized as a road.	This route, identified on the inventory maps as part of "old Utah 95" is a way that is the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
15	A route identified by San Juan County as SJ104-23 was not recognized as a road.	Upon further review, this route was examined and identified as FV1A. The field team determined the route was a road as identified in the inventory files.	NO
16	A route identified by San Juan County as SJ104-26 was not recognized as a road.	Upon further review, this route was examined and determined to be a seismic line that is being utilized as a travel route. The route was determined to be a way.	NO
17	A route identified by San Juan County as SJ104-27 was not recognized as a road.	Upon further review, this route is located in an area that contains numerous wood cutting routes that negate the naturalness of the area. As a result, the specified route was not singled out or recorded with a road/way form.	NO
18	San Juan County states that route BL2A should be determined to be a road.	BL2A was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
19	BLM identified L-1H as a road	This route was determined to be a vehicle way	NO

*ARCH AND MULE CANYONS (Refer to Map 3-1)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
	but avoids addressing the lack of naturalness and other impacts related to routes in adjacent wilderness study areas.	because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	

**Arch and Mule Canyon Inventory area was found not to possess wilderness character.*

BRIDGER JACK MESA (Refer to Map 3-2)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
1	Route CS1A was recognized, but was not cherry-stemmed from the inventory area.	A material site and access route identified as CS1A have been cherry-stemmed from the inventory area. Together, they constitute a substantially noticeable intrusion on wilderness character.	NO
2	Route CS1B should be determined to be a road.	CS1B is a 0.1-mile spur route that was not constructed, is not maintained, and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
3	Route CS1C should be determined to be a road.	CS1C is a 0.3-mile vehicle way that is a well-established route that leads to an old mine prospect and associated disturbances. This way and the mining disturbances are cumulatively a substantially noticeable impact on wilderness character and have been cherry-stemmed.	YES (See "A" on Map 2-1 in Section II)
4	BLM classified route CS1D as a vehicle way, but then cherry-stemmed it. It should not be cherry-stemmed.	The Corral Pocket vehicle way, (CS1D) was cherry-stemmed because it constitutes a substantially noticeable impact to wilderness character. This vehicle way does not meet all criteria of the BLM road definition used for wilderness inventory purposes. The way does receive regular and continuous use. This way, which is gated at its entrance near State Highway 211, provides access to an environmental sensor-monitoring site and a section of state land.	NO
5	BLM used a section line as the boundary and did not inventory natural lands to the east. The boundary should be expanded.	These lands are outside the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
6	BLM incorrectly identified vehicle way CS1E as a road. The route should not be cherry-stemmed.	The Davis Canyon route (CS1E) is a well-established, heavily used vehicle way that provides access from State Highway 211 to a designated trailhead at the boundary of Canyonlands National Park. While this route does not meet all criteria of the BLM road definition used for wilderness inventory purposes, it constitutes a substantially noticeable impact on wilderness character and has been cherry-stemmed.	NO

BRIDGER JACK MESA (Refer to Map 3-2)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
7	Route CS1F should be determined to be a road.	CS1F is a 0.1-mile route spur that was not constructed, is not maintained and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
8	BLM uses route 98 VVKS-1 and a section line as a boundary. These are not significant impacts and the inventory area should be expanded. Another comment stated this route should be classified as a road.	98VVKS-1 in combination with other routes and mining impacts located to the east was determined to be the most appropriate boundary configuration in this location. It marks the edge of disturbance, separating lands with wilderness character from those lacking wilderness character. This route was determined to be a vehicle way because it did not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
9	BLM's boundary excludes many non-impacted areas. Way VKS3D is incorrectly classified as a road. Another comment stated the route should be a road.	VKS3D is a vehicle way because it did not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. This way marks the edge of disturbance separating the lands found to have wilderness character from those that lack wilderness character due to mining disturbances and other vehicle routes.	NO
10	Route VKS3C should be determined to be a road.	VKS3C is an un-maintained, little-used route that was determined to be a way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
11	Route VKS3A was determined to be a road.	VKS3A was inventoried as a road for 3.6 miles and forms a portion of the inventory area boundary.	NO
12	Route LS-1A should be determined to be a road. Another comment stated that this route should not be used as a boundary because it is extremely faint and is not a significant impact. The boundary should be expanded.	LS-1A is a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. This way was determined to be an appropriate boundary that marks the edge of disturbance separating the lands with wilderness character from those lacking wilderness character due to the cumulative impacts of vehicle routes and mining disturbances.	NO
13	Route VKS3B should be determined to be a road.	VKS3B is an un-maintained, little-used route that was determined to be a way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
14	Route VKS4B should be determined to be a road. Another comment stated that the cherry-stem should be removed,	The Lavender Canyon route (VKS4B) was cherry-stemmed because it constitutes a substantially noticeable impact on wilderness character. This way does not meet all criteria of the BLM road definition used for wilderness	NO

BRIDGER JACK MESA (Refer to Map 3-2)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
	because the route is in a wash that frequently floods.	inventory purposes. The well-established way is signed from State Highway 211. It accesses a road that serves as an entry point to Canyonlands National Park. To drive the road, a permit is required from the National Park.	
15	Route 98-VKS-3 should be determined to be a road.	98-VKS-3 is entirely on state land and is not part of the area with wilderness character.	NO
16	Route VKS4D should be determined to be a road. Another comment stated BLM incorrectly cherry-stems this route, which, frequently follows a wash and is subject to flooding.	The segment of VKS4D way off the Lavender Canyon cherry-stem is quite distinct and heavily used to the arch in Dry Fork Canyon. This route was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. Beyond the arch the route is not cherry-stemmed because it is indistinct, is not regularly used, and does not impact the wilderness character of the area.	YES (See "C" on Map 2-1 in Section II.)
17	Route VKS4C should be determined to be a road.	VKS4C is a 0.2-mile stub that was determined to be a vehicle way because it was not constructed or maintained and does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
18	Route VKS-1Z should be determined to be a road.	VKS-1Z is an un-maintained, little-used route that was determined to be a vehicle way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
19	All of route VKS2A should be determined to be a road.	The first 0.8 miles of VKS2A is a boundary route that was determined to be a road. The remaining 0.2-mile segment of this route is a little-used, un-maintained way that does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
20	Route VK1B was recognized by the BLM, but was not cherry-stemmed.	VK1B forms the boundary of the inventory area. Because the road does not penetrate the inventory area, a cherry-stem is not needed.	NO

BUTLER WASH (Refer to Map 3-3)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
1	A route identified by San Juan County as SJ113-17 was not inventoried and should be recognized as a road.	This very short vehicle "turnaround" off the Ruin Park road was established by vehicle use and is approximately 30 yards long. It was determined to be a pull out.	NO
2	Route VKL2D should be determined to be a road.	This 0.3-mile vehicle way was not constructed or maintained and does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
3	BLM uses an insignificant way	VKL2A is a boundary way that marks the edge	NO

BUTLER WASH (Refer to Map 3-3)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
	<p>identified as VKL2A as the boundary.</p> <p>A similar comment was received on VKL2B.</p>	<p>of disturbance that separates the lands with wilderness character from lands lacking wilderness character due to a pipeline, livestock improvements, and mining disturbances. VKL2B is within the area lacking wilderness character.</p>	
4	<p>Route VKL1I should be recognized as a road, but it is identified as a way. BLM avoids addressing issues of the effect of the road on wilderness by using the road as the boundary of the area.</p>	<p>VKL1I was determined to be a vehicle way because it was not constructed and is not maintained and does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. This way does not form the boundary of the area.</p>	NO
5	<p>BLM has used insignificant way identified as VKL1H as the boundary and consequently excludes areas that do not have impacts from being considered for this study.</p> <p>Another comment states route VKL1H should be determined to be a road.</p>	<p>VKL1H marks the edge of disturbance that separates lands with wilderness character from those lacking wilderness character due to impacts associated with a pipeline, trough, and several vehicle ways. This route was determined to be a vehicle way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.</p>	NO
6	<p>Route VKL1G should be determined to be a road.</p>	<p>VKL1G does not appear to have been constructed and is not maintained. It was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.</p>	NO
7	<p>Routes VKL1F and VKL1E should be determined to be roads.</p>	<p>VKL1F (0.05-mile spur) and VKL1E (0.2-mile spur) do not appear to have been constructed and are not maintained. They were determined to be vehicle ways because they do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.</p>	NO
8	<p>A route identified by San Juan County as SJ 113-20 was not inventoried nor recognized in the BLM inventory.</p>	<p>This road was inventoried and separates the existing Butler Wash WSA from a portion of the inventory area that does not have wilderness character due to substantial impacts.</p>	NO
9	<p>Comments were received on routes VKL1A, VKL1B, VKL1C and VKL1D indicating they should be roads.</p>	<p>These routes are in areas lacking wilderness character or are on state lands.</p>	NO
10	<p>BLM failed to complete a Road/Way form on this cherry-stemmed route.</p> <p>Another comment was received stating that this route was cherry-stemmed to avoid addressing issues on lack of naturalness. This route, J 113-21,</p>	<p>After further review, this route, identified as VKL1 (99), was determined to be a vehicle way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. The vehicle way was found to be substantially unnoticeable, with little overall effect on the naturalness of the area. The cherry-stem has been removed.</p>	YES (See "A" on Map 2-2 in Section II)

BUTLER WASH (Refer to Map 3-3)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
	was not inventoried nor recognized in the inventory.		
11	San Juan County routes SJ 113-16, 18, and 19 were not recognized in the inventory.	SJ-113-16, 18 and 19 are within the existing Butler Wash WSA and are outside the scope of this inventory.	NO

CHEESEBOX CANYON (Refer to Map 3-4)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
1	A route identified by San Juan County as SJ 93-7 was not inventoried or recognized in the BLM inventory.	This access road to the base of Lone Butte and the associated mining area is the boundary between the existing Cheesebox Canyon WSA and the inventory area.	NO
2	The route and mining impacts on Lone Butte are insignificant.	Mining impacts on Lone Butte were found to be substantial impacts to the natural character of the area. FS1-99 along the south half of the butte is a vehicle way that marks the edge of disturbance between the lands with wilderness character and lands lacking wilderness character due to mining impacts.	NO
3	BLM excluded an area without significant impacts by using the creek bottom and route VE2A as the boundary. The route should be cherry-stemmed to the overlook and air strip; the natural areas beyond have wilderness character and should be included in the area. Another comment stated this route should be determined to be a road, not a way.	The area between State Highway 95 and the creek bottom was found to lack wilderness character due to multiple impacts including: a landing strip, gravel storage, camping areas, and several other surface disturbances, including the vehicle route to the landing strip and overlook. VE2A is a way within an area found to have wilderness character. This way is not a boundary. VE2A was determined to be a way because it was not constructed or maintained.	NO
4	BLM's boundary is inappropriate. The impacts have been reclaimed and are insignificant. No mechanical maintenance is present along these old routes. The boundary should be expanded.	The boundary in this location follows an old mining vehicle way and the edge of mining disturbance. The area within Deer Flat was found not to have wilderness character because of extensive mining disturbance and stock reservoirs.	NO
5	Route VE1D should be determined to be a road.	This little-used 0.8-mile route was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
6	Route VE1C should be determined to be a road.	This little-used 0.3-mile route was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
7	A route identified by San Juan	This route was inventoried and forms part of the	NO

CHEESEBOX CANYON (Refer to Map 3-4)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
	County as SJ 93-11 was not inventoried.	boundary of the area. The field map shows the boundary follows an old road.	
8	A route identified by San Juan County as SJ 93-10 was not inventoried.	This route was inventoried and noted on the inventory map as a vehicle way off of State Highway 95.	NO
9	Route VE1A should be determined to be a road.	This 0.8-mile spur route branching off the main boundary road was determined to be an un-maintained vehicle way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
10	Comments were received regarding vehicle routes identified by San Juan County as SJ 93-6, 8, 9, and others, and on a previously chained area.	SJ 93-8 and 9 and the chained area are within the existing WSA. SJ 93-6 is on state land. All are outside the scope of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO

COMB RIDGE (Refer to Map 3-5)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
1	The boundary should be adjusted on the Butler Wash side to include areas free of impacts. The few impacts should be cherry-stemmed from the area.	The cumulative impacts of numerous intrusions (approximately 25 noted on field maps) in a relatively small area along the east side of Comb Ridge between Butler Wash and the Butler Wash Road, resulted in the decision to place the boundary at the wash itself. The wash is the most appropriate boundary marking the edge of disturbance separating the lands with wilderness character from lands lacking wilderness character.	NO
2	Route VE1A was not recognized as a road in the inventory. The comment also referred to an existing borrow pit within the area.	VE1A is a 0.01mile stub that was determined to be a way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. Approximately 1/4 mile north of VE1A is another short stub that leads to a borrow pit which was "blistered out" of the area with wilderness character.	NO
3	A route identified by San Juan County as SJ 103-39 was not recognized.	This route is the inventory unit boundary that separates inventoried lands found from other public lands that were not part of the inventory.	NO
4	A route identified by San Juan County as SJ 103-40 was not inventoried or recognized.	This route is the Comb Wash Road that was inventoried and is the boundary between the Comb Wash inventory area and other lands in the Road Canyon and Fish and Owl Creeks inventory areas.	NO
5	A route identified by San Juan County as SJ 103-38 was not inventoried or recognized.	This 50-yard route spur route, identified as MS1A, off the Comb Wash Road was determined to be a way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes because it was	NO

COMB RIDGE (Refer to Map 3-5)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
		not constructed, not maintained, and does not receive regular and continuous use.	
6	Route VE1B should be determined to be a road.	This 0.01-mile route spur off the Comb Wash Road was determined to be way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes because it was not constructed, not maintained, and does not receive regular and continuous use.	NO
7	Route BL2A should be determined to be a road and extended. The inventory showed the route stopping at the inventory area boundary when it actually extends further west. The route extension was identified by San Juan County as SJ 103-34.	The first 0.2 miles of BL2A, west of Butler Wash, is within the area found lacking wilderness character. BL2A is an un-maintained, little-used route that was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
8	Route BL2C should be determined to be a road and extended. The inventory showed the route stopping at the inventory area boundary. It extends further west. The route extension was identified by San Juan County as SJ 103-35.	The first 0.2 miles of BL2C, west of Butler Wash, is within the area found lacking wilderness character. BL2C is an un-maintained, little-used route that was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
9	Route VE2A should be determined to be a road.	This .05-mile route is an un-maintained way off the Comb Wash Road. It was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
10	Route BL2E should be determined to be a road and extended. The inventory showed the route stopping at the inventory area boundary. It extends further west. The route extension was identified by San Juan County as SJ 103-41.	0.1 miles of route BL2E, west of Butler Wash, is within the area found lacking wilderness character. BL2E is an un-maintained, little-used route that was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
11	Comment was received that routes VE2B, VE2C, VE2D and VE2E should be determined to be roads.	All of these routes (0.01 to 0.3 miles long) located along the west side of the inventory area do not appear to have been constructed, are not maintained, and were determined to be vehicle ways because they do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
12	San Juan County route SJ 103-37 was not inventoried or recognized by BLM.	This is a wash bottom and is not considered a vehicle route.	NO
13	San Juan County route SJ 103-36 was not inventoried or	This route is entirely on state lands and not part of the area with wilderness character.	NO

COMB RIDGE (Refer to Map 3-5)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
	recognized by BLM.		

CROSS CANYON (Refer to Map 3-6)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
1	A route identified by San Juan County as SJ 106-14 was not inventoried or recognized by the BLM.	The route parallels a fence line located outside the inventory area. No extension of the route, branching south from the fence into the inventory area was found.	NO
2	Route B1C was recognized as a road but BLM avoids addressing issues of lack of naturalness by cherry-stemming this route. Another comment was received stating a route identified by San Juan County as SJ 106-10 was not inventoried or recognized beyond B1C.	This route is a way that varies in character over its length. The first 0.5 miles segment is a well-established route leading to a stock pond where additional intrusions are located. This segment was determined to be a substantially noticeable impact and was cherry-stemmed. Beyond the stock pond, (upper portion of B1C and SJ 106-10) the route is far less distinct, is not maintained, and was determined to be a way. This way was found to be substantially unnoticeable, with little overall effect on the naturalness of the area.	NO
3	Route B1B should be determined to be a road.	B1B was not constructed, not maintained, and does not receive regular and continuous use and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
4	Route B1D should be determined to be a road.	B1D is not maintained and does not receive regular and continuous use and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
5	Routes identified by San Juan County as SJ 106-11 and SJ 106-12 were not inventoried or recognized by the BLM as roads.	Upon further review, a faint vehicle way to a stock-pond was identified as CC1 (SJ 106-12). The way does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes because it was not constructed or maintained, and does not receive regular and continuous use. SJ 106-11 could not be found in the area identified by the comment.	NO
6	A route identified by San Juan County as SJ 106-13 was not inventoried or recognized by the BLM.	This route is located in an area with no wilderness character.	NO
7	Route B1H should be determined to be a road.	B1H is within an area that has been severed from the area with wilderness character by state land.	NO

DARK CANYON (Refer to Map 3-7)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Four routes identified by San Juan County as SJ 107-62, 63, 64, and 65 in the Imperial Valley area were not inventoried or recognized by the BLM as roads.	These routes were examined and noted on the inventory maps. Due to difficult vehicle access, BLM field crews walked along these routes, established photo points and determined the routes to be ways because they do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
2	A route segment identified as road VE1E should be a way. Another comment stated that this route is a road that extends six miles to Imperial Valley.	Upon further review, VE1E was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. The route does not appear to have been constructed or maintained. The cherry-stem has been removed.	YES (See "A" on Map 2-4 in Section II.)
3	Route VE2C should be recognized as a road, not a vehicle way.	Upon further review, a portion of way VE2C has been cherry-stemmed because it constitutes a substantially noticeable impact on wilderness character. While this way does not meet all criteria of the BLM road definition used for wilderness inventory purposes, this way is a well-established route that accesses cultural sites that have been posted with interpretive signs.	YES (See "J" on Map 2-4 in Section II.)
4	Two short spur routes identified by San Juan County as SJ 107-60 and 61 that branch from VE2C were not inventoried or recognized by BLM as roads.	Upon further review, (SJ 107-60) and (SJ 107-61), which are two spurs that are extensions of route VE2C, have been cherry-stemmed because they constitute a substantially noticeable impact on wilderness character. These ways do not meet all criteria of the BLM road definition used for wilderness inventory purposes. They access a cultural site and a campsite.	YES (See "J" on Map 2-4 in Section II.)
5	Route VE1F should be determined to be a road.	This 0.7-mile two-track route does not appear to have been constructed, nor is it maintained. This route was determined to be a vehicle way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
6	Route VE1G should be determined to be a road.	Only a 0.2-mile segment of VE1G branching from the junction with VE1H is on public land. The remaining 1.1 miles is on state land. No construction or maintenance was noted on the public land segment and the route was determined to be a way because it does not meet all of the criteria of the BLM road definition.	NO
7	Route VE1H should be determined to be a road.	This route does not appear to have been constructed, it is not maintained, and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
8	Route VE2B should be determined to be a road.	No construction or maintenance was noted on this 0.7-mile spur. The route was determined to be a way because it does not meet all of the criteria of the BLM road definition used for	NO

DARK CANYON (Refer to Map 3-7)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
		wilderness inventory purposes.	
9	BLM incorrectly used route VE2A as the boundary; the last 2 miles are not maintained. The boundary should be expanded.	VE2A is a constructed, maintained, regularly and continuously used road. The area between this road and the Ruin Park road was found to lack wilderness character.	NO
10	Two short spur routes identified by San Juan County as SJ 107-58 and 59 were not inventoried or recognized by BLM as roads.	Upon further review, one route (SJ 107-59) is the access road to the BLM Beef Basin guard station. Both the guard station and this road are in an area that was determined to lack wilderness character. The other short spur route (SJ 107-58), was identified on inventory maps as an un-maintained vehicle way that provides access to a spring. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
11	Route VL3A should be determined to be a road.	VL3A does not appear to have been constructed; it is not maintained and was determined to be a vehicle way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
12	Route VE1D should be determined to be a road.	VE1D is a well-established route to an old cabin/corral that receives regular and continuous use. This way does not meet all of the criteria of the BLM road definition. Cumulatively, the cabin/corral and way are substantially noticeable intrusions that have been cherry-stemmed.	NO
13	Route VE1C should be determined to be a road.	VE1C does not meet all criteria of the BLM road definition, but it is a well-established way to a stock pond and receives regular and continuous use. The stock pond and way cumulatively are substantially noticeable intrusions and have been cherry-stemmed. This cherry-stem was not shown on the map in the <i>1999 Utah Wilderness Inventory</i> . This mapping error has since been corrected.	YES (See "B" on Map 2-4 in Section II.)
14	Routes VKL1B, VKL1C, and VKL1D, in the vicinity of the north Fable Canyon trailhead, should be determined to be roads.	These routes are not maintained, and have been determined to be vehicle ways because they do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
15	Routes VKL1E and VKL1F, in the vicinity of the north South Spring, should be determined to be roads.	VKL1E and VKL1F are two short spur routes, which were not constructed, are not maintained and were determined to be ways because they do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
16	Routes VKL1G, VKL1H, VKL1I, VKL2A, and a route identified by San Juan County as SJ 107-71, along the south Beef Basin Road, should be	The first four spur routes (from approximately 50 yards to 0.25 miles long) branch from the south Beef Basin Road. None appear to have been constructed, nor are they maintained. These routes were determined to be vehicle	NO

DARK CANYON (Refer to Map 3-7)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	determined to be roads.	ways because they do not meet all of the criteria of the BLM road definition. SJ 107-71 was identified on the inventory map as a fence line and is not considered a travel route.	
17	BLM's Road/Way form confirms that routes VKL2B and VKL2E are not maintained. They are incorrectly classified as roads and they should not be cherry-stemmed.	These ways were cherry-stemmed because they constitute substantially noticeable intrusions that impact wilderness character. The length of the cherry-stem on VKL2E has been shortened to more accurately reflect where the route changes to a less distinct vehicle way that does not receive regular or continuous use and substantially unnoticeable.	YES (See "D" on Map 2-4 in Section II.)
18	Route VKL2F, in the vicinity of Ruin Canyon, should be recognized as a road.	VKL2F was not constructed or maintained and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
19	Route SEA, in the vicinity of Calf Canyon, should be recognized as a road.	Upon further review, the first 0.3 miles of this route was determined to be a road. Beyond this segment, the route is considered to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	YES (See "C" on Map 2-4 in Section II.)
20	Two routes identified by San Juan County as SJ 107-56 and 57, in the vicinity of Beef Basin Wash, were not inventoried by BLM. The routes should be recognized as roads.	These routes were inventoried as spurs off of VL3B and noted on the inventory map. Both routes were not constructed or maintained and were determined to be vehicle ways because they do not meet all of the criteria of the BLM road definition.	NO
21	BLM's Road/Way form confirms that route VE5A is not maintained, but incorrectly classifies it as a road. This route is not a significant impact and should not be cherry-stemmed.	Upon further review, this route was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. The cherry-stem has been removed.	YES (See "L" on Map 2-4 in Section II.)
22	BLM incorrectly cherry-stems and classifies route VE4D as a road. The last 2.5 miles are not maintained and this route should not be cherry-stemmed.	This is a well-established road that provides access to a wildlife enclosure and a public water reserve (#U41624) at Moki Spring.	NO
23	Routes VE5B and VE5C should be determined to be roads.	Both of these routes were determined to be ways because they do not receive regular or continuous use nor are they maintained. They do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. The segments beyond Wild Cow Spring are almost indistinct.	NO
24	Route VE5D should be determined to be a road.	This 0.5-mile route is located within a previously chained area that was determined not to have wilderness character.	NO

DARK CANYON (Refer to Map 3-7)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
25	A route identified by San Juan County as SJ 107-69 was not inventoried by BLM. It should be determined to be a road.	Upon further review, this route was identified as FM3D. The route was determined to be a way because it was not constructed, is not maintained, and does not receive regular and continuous use.	NO
26	Route VE4B and two routes identified by San Juan County as SJ 107-68 and 70, should be determined to be roads.	These ways mark the edge of disturbance forming boundaries separating the inventory area from lands that lack wilderness character due to impacts of previous mining activity and vegetative chainings. These ways do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
27	A route identified by San Juan County as SJ 107-55 was cherry-stemmed by the BLM, but not inventoried.	Upon further review, this route, identified as DC-1, was determined to be a vehicle way because it does not appear to be maintained and it does not receive regular or continuous use beyond the first 0.75 miles. The way does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. The cherry-stem has been removed.	YES (See "F" on Map 2-4 in Section II.)
28	A route identified by San Juan County as SJ 107-53 was not recognized by BLM. It should be determined to be a road.	Upon further review, this route, identified as FM2D, was determined to be a way because it was not constructed, maintained, and does not receive regular or continuous use.	NO
29	Route VE4A should be determined to be a road.	VE4A, which spurs off VE3B, does not appear to have been constructed nor is it maintained. The route was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
30	Route VE4C is not maintained and is washed out. The route is incorrectly classified as a road and should not be cherry-stemmed.	VE4C is a road that is one of the main accesses to Fable Canyon. This road was constructed and receives regular and continuous use and is maintained as conditions warrant keeping the road in a useable condition to the trailhead.	NO
31	BLM inventoried route VE10A and a route identified by San Juan County as SJ 107-52, but did not determine them to be roads.	Upon further review, VE10A, (0.5-miles) and FM1 (SJ 107-52, 0.2-miles) that branch off the boundary road were determined to be vehicle ways because they were not constructed or maintained and do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
32	BLM used the entire route as a boundary. The route should only be cherry-stemmed to where it becomes impassable.	This route is not a cherry-stem it is the boundary between the Dark Canyon and Sheep Canyon inventory areas. This is the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> . The lower segment of the route is a road; the upper segment to the boundary of Glen Canyon NRA is a less distinct vehicle way that receives little use.	NO

DARK CANYON (Refer to Map 3-7)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
33	BLM avoids addressing issues of lack of naturalness by cherry-stemming routes LL1D and LL1E.	Upon further review, these routes were determined to be ways. The routes were constructed and receive regular or continuous use, they do not appear to be maintained, and therefore do not meet all criteria of the BLM road definition for wilderness inventory purposes. These routes were found to be substantially unnoticeable, with little overall effect on the naturalness of the area. The cherry-stems have been removed.	YES (See "G" and "H" on Map 2-4 in Section II.)
34	BLM avoids addressing issues of lack of naturalness by cherry-stemming route LL1C.	Upon further review, this route was determined to be a way. The way is not maintained nor does it receive regular or continuous use. This way was found to be substantially unnoticeable, with little overall effect on the naturalness of the area. The cherry-stem has been removed.	YES (See "I" on Map 2-4 in Section II.)
35	Routes VKL2D, VKL2C and VE1A should be determined to be roads.	These routes are within state land.	NO
36	Routes VE3A and VE3B, and two routes identified by San Juan County as SJ 107-54 and 66, should be determined to be roads.	VE3A and VE3B are cherry-stems that were identified by the original 603 WSA inventory. SJ 107-54 and SJ 105-66 are within the existing WSA and are not part of the H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO

FISH AND OWL CREEKS (Refer to Map 3-8)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Route B1D should be determined to be a road.	B1D is un-maintained and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
2	Route B1E should be determined to be a road.	B1E was not constructed or maintained and was determined to be a way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
3	Route BF1F should be determined to be a road.	BF1F was not constructed or maintained and does not receive regular and continuous use and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. BF1F is part of the old Hole in the Rock Trail and is part of the Fish Creek Canyon WSA boundary.	NO
4	A route identified by San Juan County as SJ 100-35 was not inventoried or recognized by the BLM.	Upon further review, this route, identified as MS1C, provides access for fuel wood gathering. It was not constructed and is not maintained. It was determined to be a way because it does not	NO

FISH AND OWL CREEKS (Refer to Map 3-8)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
		meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	
5	Route EL1B should be determined to be a road.	EL1B was not constructed or maintained and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
6	A route identified by San Juan County as SJ 100-40 was not inventoried or recognized by the BLM.	Upon further review, this route was identified as MS-1B, was determined to be a vehicle way because it does not appear to have been constructed, is not maintained and does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
7	BLM's boundary is incorrect because the area to the east is free of significant impacts but is excluded from the area.	This area lacks wilderness character due to the cumulative impacts of previous chainings, fuel wood gathering, and several vehicle ways.	NO
8	A route identified by San Juan County as SJ 100-33 was not inventoried or recognized by the BLM.	This route was identified on the inventory map as a way. It was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
9	A route identified by San Juan County as SJ 100-36 was not inventoried or recognized by the BLM.	This road was identified on the inventory map and forms a boundary separating the inventory area from lands lacking wilderness character. This road was also identified as a boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
10	A route identified by San Juan County as SJ 100-68 was not inventoried or recognized by the BLM.	This route is neither a road nor a vehicle way, but was identified on the inventory map as part of the Emigrant Trail (pack). The notation on the field map states: "not found on ground or aerial photo."	NO
11	Route BF2K should be recognized as a road.	BF2K off the Comb Wash road is very faint, not maintained, and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. BLM has posted this route as closed to vehicles for the past several years.	NO
12	A route identified by San Juan County as SJ 100-48 should be recognized as a road.	This 0.1-mile route off the Comb Wash Road is very faint, not maintained, and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. BLM has posted this route as closed to vehicles for the past several years.	NO
13	All of route B3A should be determined to be a road. Part of	B3A forms the boundary between the existing Fish Creek Canyon WSA and the inventory area	NO

FISH AND OWL CREEKS (Refer to Map 3-8)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	this route was cherry-stemmed, while another part was determined to be a way.	and was determined to be a road for 2.05-miles. The segment of B3A beyond Owl Canyon changes character and is not maintained. This segment was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	
14	Route B3B should be determined to be a road.	This 0.1-mile spur off State Road 261 is an un-maintained, little-used route that was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
15	A route identified by San Juan County as SJ 100-41 was not inventoried, but was cherry-stemmed by BLM.	This road was inventoried and noted on the inventory map. The road and landing strip were cherry-stemmed, because of their impact on wilderness character.	NO
16	A route identified by San Juan County as SJ 100-45 was not inventoried or recognize by the BLM.	Upon further review, this route, identified as MS1A, is not maintained and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
17	Routes identified by San Juan County as SJ 100-42, 43, and 44 were not inventoried or recognize by the BLM.	Upon further review, these routes, identified as ML-2M, ML-2N, ML-2R and ML-2Q have been determined to be ways. They do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. ML-2M is not maintained and does not receive regular and continuous use. ML-2N and ML-2R are not maintained or constructed and do not receive regular and continuous use. ML-2Q was not constructed and not maintained.	NO
18	Route BF2G should be determined to be a road.	BF2G off the Comb Wash Road does not appear to have been constructed, is not maintained, and was determined to be a way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
19	Routes identified by San Juan County as SJ 100-30, 31, and 32 were not inventoried or recognized by the BLM.	These routes, which extend from the Mule Canyon Road cherry-stem, are little-used un-maintained ways. They do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes. BLM has posted these routes as closed for the past several years.	NO
20	Route BF2I should be determined to be a road.	BF2I is a badly eroded route off the Comb Wash Road that was not constructed, is not maintained and was determined to be a way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
21	Route BF2J should be determined to be a road.	BF2J is an un-maintained, little-used route that was determined to be a way because it does not meet all of the criteria of the BLM road	NO

FISH AND OWL CREEKS (Refer to Map 3-8)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
		definition used for wilderness inventory purposes.	
22	Route B3D, B3F, B3G were inventoried as ways. A route identified by San Juan County as SJ 100-65 was not inventoried by BLM. All these routes should be determined to be roads. Additionally BLM ignores intrusions of seismic lines and side spurs by stating, "side spurs are substantially unnoticeable."	Each of these routes was individually found to be a way. Cumulatively, these ways as well as several seismic lines and numerous disturbances related to fuel wood cutting in this area, were determined to substantially impact the natural character of the area. Upon further review this area has been found to lack wilderness character.	YES (See "B" on Map 2-5 in Section II.)
23	Route BF2E should be determined to be a road.	BF2E receives regular and continuous use, but it is not constructed or maintained and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
24	Two routes identified by San Juan County as SJ 100-49 and 50 were not inventoried or recognized by the BLM. They should be determined to be roads.	These two routes, identified as BF2F and BF2E (0.1 and 0.2 miles, respectively) are spurs off the Comb Wash Road. They were determined to be vehicle ways because they do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
25	Route BF2C should be determined to be a road.	BF2C was determined to be a way, as it does not meet all of the criteria required for the BLM road definition. The way, a corral, and other range facilities cumulatively constitute a substantially noticeable impact on wilderness character, and are cherry-stemmed.	NO
26	A route identified by San Juan County as SJ 100-56 was not inventoried or recognized by the BLM.	Upon further review, this route identified as ML-2S, was determined to be a way because it was not constructed nor is it maintained. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
27	Route BF2B should be determined to be a road	BF2B is the boundary between the existing Fish Creek Canyon WSA and the inventory area. It was determined to be a way because it was not constructed or maintained and does not receive regular and continuous use. BF2B does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
28	A route identified by San Juan County as SJ 100-55 was not inventoried or recognized by the BLM.	This 0.01-mile way was identified and noted on the inventory map as accessing a line shack. The way and shack are cumulatively a substantially noticeable impact on wilderness character and were cherry-stemmed.	NO
29	A route identified by San Juan County as SJ 100-64 was not inventoried or recognized by the BLM.	Upon further review, a field check determined that this track starts at a material pit and proceeds cross-country to access a natural depression that serves as a stock-pond. Because	NO

FISH AND OWL CREEKS (Refer to Map 3-8)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
		there is a clear lack of definition to this track, it is not considered to be a vehicle travel route.	
30	A route identified by San Juan County as SJ 100-65 should be determined to be a road.	This route was inventoried and is located in an area that was determined not to have wilderness character.	NO
31	19 routes identified by San Juan County as SJ 100- 34, 37, 38, 39, 46, 47, 51, 52, 53, 57, 58, 59, 60, 61, 62, 63, 66, 67, and 69 were not inventoried or recognized by BLM. In addition, route BF2D should be identified as a road.	SJ 100-34, 100-37-38-39, 100-46-47, 100-51-52-53, 100-57 through 63, 100-66-67 and 100-69 are within the existing Fish Creek Canyon WSA. BF2D does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes and was determined to be a way.	NO

FORT KNOCKER CANYON (Refer to Map 3-9)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Route VL1A should be determined to be a road.	VL1A is a faint, un-maintained spur off the main road. It was determined to be a way because it was not constructed or maintained, and does not receive regular and continuous use. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
2	A route identified by San Juan County as SJ 94-10 was not inventoried by BLM.	This road was identified on the inventory map and established as the boundary between the Ft. Knocker Canyon and Sheep Canyon inventory areas.	NO
3	A route identified by San Juan County as SJ 94-5 was not inventoried by BLM.	Upon further review, This 0.1mile route off the main road, was identified as FK-2, and determined to be a vehicle way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
4	A route identified by San Juan County as SJ 94-8 was not inventoried by BLM.	Upon further review this 0.1-mile route, identified as MS-00-3, was determined to be a vehicle way because it is not maintained, and, therefore, does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
5	A route identified by San Juan County as SJ 94-13 was not inventoried by BLM.	Evidence of a reclaimed seismic line was noted in this area, but no vehicle tracks or indications of use were present when the area was inventoried.	NO
6	A route identified by San Juan County as SJ 94-7 was not inventoried by BLM, but was cherry-stemmed out of the inventory area.	Upon further review, this 0.05-mile segment, identified as MS-00-2, was determined to be a road because it meets all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO

FORT KNOCKER CANYON (Refer to Map 3-9)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
7	A route identified by San Juan County as SJ 94-6 was not inventoried by BLM.	This is State Highway 95, which forms part of the western boundary of the inventory area.	NO
8	A route identified by San Juan County as SJ 94-12 was not inventoried by BLM.	Upon further review, this route, identified as FK-1, was determined to be a way because it does not meet all the criteria of the BLM road definition used for wilderness inventory purposes.	NO
9	Route E2B should be determined to be a road.	The 0.6-mile E2B route appears to be rarely used and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
10	A route identified by San Juan County as SJ 94-9 was not inventoried by BLM.	Upon further review, this spur route, identified as FK-3, has been determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
11	A route identified by San Juan County as SJ 94-11 was not inventoried by BLM.	Upon further review, this route, identified as FK-4, was found to be a little-used, un-maintained way that does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
12	Route E2A was recognized as a road by BLM but was not cherry-stemmed from the inventory area.	This road was meant to be the boundary of the inventory area, but was digitized incorrectly. This mapping error has been corrected.	YES (See "B" on Map 2-6 in Section II.)

GOOSENECK (Refer to Map 3-10)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
1	Route VKS2B and a route identified by San Juan County as SJ 114-13, were not inventoried nor recognized by the BLM. They should be determined to be roads.	The Chicken Corners Road (VKS2B) and the Lockhart Basin Road (SJ114-13) were noted on the inventory maps and used as boundaries for this inventory area. The Lockhart Basin Road was identified as a segment of the boundary of the previous H.R. 1500 legislative proposal.	NO
2	BLM's boundary excludes insignificant impacts and many non-impacted areas. The boundary should be redrawn to exclude only the impacted areas.	Approximately 82-acres along the south bank of the Colorado River were determined to have wilderness character. The omission of this parcel was the result of a mapping error.	YES (See "A" on Map 2-7 in Section II.)
3	A route identified by San Juan County as SJ 114-12 was not inventoried nor recognized by the BLM. The route should be determined to be a road.	Upon further review, this 0.5-mile route has been identified as GN-2000-A. This route, which follows a wash bottom, was not constructed; it is not maintained and was determined to be a way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO

GOOSENECK (Refer to Map 3-10)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
4	The proposed area is too small in size to qualify for WSA study.	The inventory area is contiguous to lands administratively endorsed for wilderness by Canyonlands Natl. Park, and thereby meets the BLM wilderness inventory size criteria.	NO

GRAND GULCH (Refer to Map 3-11)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Two routes identified by San Juan County as SJ 99-67 and 68 were not inventoried by the BLM. The routes should be determined to be roads.	Upon further review, these routes , identified as GG-1 (SJ 99-67) and GG-2 (SJ 99-68), were determined to be ways. They do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
2	Two routes identified by San Juan County as SJ 99-72 and 73 were not inventoried or recognized by the BLM. The routes should be determined to be roads.	Both routes were noted on inventory maps. SJ 99-73 is a way that serves as the inventory area boundary. It encircles a small-chained area, which marks the edge of disturbance of an area found lacking wilderness character. SJ 99-72 is a 0.2-mile spur that was not constructed, is not maintained, and is a vehicle path used for wood gathering. It was determined to be a vehicle way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
3	Route VKL1C should be determined to be a road.	VKL1C is a 1.0-mile route that was determined to be a way because it does not appear to have been constructed nor is it maintained. The way does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
4	Route VE1A should be determined to be a road.	VE1A is a lightly-used route that was determined to be a way because it is not maintained and does not receive regular and continuous use and does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
5	BLM fails to inventory the entire roadless area by using a section line as the boundary.	This area is beyond the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
6	Route VKL1D should be determined to be a road.	VKL1D is an un-maintained route that is lightly used and was determined to be a way because it does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
7	A route identified by San Juan County as SJ 99-74 was not inventoried or recognized by the BLM. The route should be	This route forms part of the boundary of the inventory area. The southern extension of this route is located on state land and the existing WSA.	NO

GRAND GULCH (Refer to Map 3-11)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	determined to be a road.		
8	Route BE3H should be determined to be a road.	BE3H is a 0.2-mile route that branches from the State Road 261 and was determined to be an un-maintained vehicle way. It does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
9	Routes BE3I, BE3J, LL4J, LL4I, and LL4H should be determined to be roads.	These five spur routes, which branch from State Road 261, are un-maintained vehicle ways because they do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
10	Route LL4G was recognized as a road by BLM but the BLM avoids addressing management issues caused by this route. This route is not cherry-stemmed.	Route LL4G is the Todie Flat Road that provides access to a popular trailhead leading into Grand Gulch. This cherry-stemmed road forms part of the boundary between the inventory area and the existing WSA. The cherry-stemming of intrusions is an accepted method in the BLM wilderness inventory process.	NO
11	The BLM boundary is an insignificant route, which is not identified with a Road/Way form. BLM fails to inventory past the "end of maintenance," but uses this entire route as the boundary. The entire route should not be cherry-stemmed, allowing for boundary expansion.	This road, which forms a portion of the boundary of the inventory area, meets all of the criteria of the BLM road definition used for wilderness inventory purposes. The area to the north is beyond the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
12	A route identified by San Juan County as SJ 99-54 was not inventoried by BLM; however, it was cherry-stemmed. By cherry-stemming BLM avoids addressing management issues caused by this route.	This is the Collins Spring Road that was noted on the inventory map. It forms a portion of the boundary of the existing WSA and the inventory area, and was cherry-stemmed to a popular trailhead. The cherry-stemming of intrusions is an accepted method in the BLM wilderness inventory process.	NO
13	Route BE3C should be determined to be a road.	BE3C is a short spur route that parallels State Road 276 and was determined to be a way because it is not maintained and, therefore, does not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
14	A route identified by San Juan County as SJ 99-57 was not inventoried or recognized by the BLM. It should be determined to be a road.	Upon further review, the area where SJ 99-57 was located was examined and a vehicle route was not identified. A seismic line was noted in the area that corresponds with the location of the proposed route.	NO
15	Two routes identified by San Juan County as SJ 99-64 and 65, were not inventoried or recognized by the BLM. They	This area was inventoried. The inventory map identifies a seismic line in this location that crosses route BE3F; however, no discernable vehicle routes were found.	NO

GRAND GULCH (Refer to Map 3-11)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	should be determined to be roads.		
16	A route identified by San Juan County as SJ 99-63 was not inventoried or recognized by the BLM. It should be determined to be a road.	This route is a continuation of BE3E, a cherry-stemmed way leading to a drill pad. It was determined to be a way because it is not maintained. It was cherry-stemmed because, in cumulatively with the drill pad, it constitutes a substantially noticeable impact on wilderness character. The segment of the route beyond the drill pad, changes character and is not cherry-stemmed because it is a less-visible impact on wilderness character.	NO
17	A route identified by San Juan County as SJ 99-56 was not inventoried or recognized by the BLM. It should be determined to be a road.	Upon further review, this area was field checked and the review identified a seismic line in this location; however, no discernible vehicle route was found.	NO
18	Route BE3F should be determined to be a road.	BE3F was determined to be a vehicle way because it does not appear to have been constructed nor is it maintained. It does not meet the criteria of the BLM road definition used for wilderness inventory purposes.	NO
19	Routes BE2C, BE2D and BE2E should be determined to be a roads.	These three routes, varying in length from 0.4 to 1.1 miles, do not appear to have been constructed nor are they maintained. These routes were determined to be ways because they do not meet all of the criteria of the BLM road definition used for wilderness inventory purposes.	NO
20	Route BE2B should be determined to be a road.	Upon further review, BE2B is a short segment of the original roadbed for State Road 27. The roadbed has been largely reclaimed and does not present a substantial impact to wilderness character because it does not receive maintenance or regular and continuous use. It was determined to be a vehicle way because it does not meet the criteria of the BLM road definition used for wilderness inventory purposes.	NO
21	Route BE1E was recognized as a way but cherry-stemmed by BLM. The BLM is inconsistent.	This route was determined to be a substantially noticeable way because even though it was not constructed or maintained it is a well-established vehicle route that provides access to a large stock pond and other range improvements. Cumulatively with the range development, this way constitutes a substantially noticeable impact on wilderness character and was cherry-stemmed.	NO
22	Routes BE2A, BE1C, and BE1D should be determined to be roads.	These three routes are old seismic lines. They are faint, receive very little use, and are unmaintained. They were determined to be vehicle	NO

GRAND GULCH (Refer to Map 3-11)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
		ways because they do not meet the criteria of the BLM road definition used for wilderness inventory purposes.	
23	Three routes identified by San Juan County as SJ 99-50, 51, and 52 were not inventoried or recognized by the BLM.	These extremely faint seismic line extensions of the three routes referenced in #22 were noted during field inventories. Little or no evidence of vehicle use was identified on these segments at the time of field inventory and they are not considered to be vehicle access routes.	NO
24	Route BE1B should be determined to be a road.	This faint 0.8-mile route does not appear to have been constructed, is not maintained, and was determined to be a vehicle way. It does not meet the criteria of the BLM road definition used for wilderness inventory purposes	NO
25	A route identified by San Juan County as SJ 99-84 was not inventoried by BLM; however, it was cherry-stemmed.	This cherry-stemmed road was inventoried and noted on field inventory maps. It is a segment of the boundary between the existing Grand Gulch ISA complex and the inventory area.	NO
26	Route LL4B should be determined to be a road. Another comment stated that BLM mistakenly cherry-stemmed this road.	Upon further review LL4B does not appear to have been constructed, it is not maintained, and was determined to be a way. It does not meet the criteria of the BLM road definition used for wilderness inventory purposes, and the cherry-stem has been removed.	YES (See "B" on Map 2-8 in Section II.)
27	Routes LL4D and LL4E should be determined to be roads.	These rough, un-maintained routes were determined to be vehicle ways because they do not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
28	BLM incorrectly cherry-stems the entire length of way LL4C. The last mile of the route is not maintained and should not be cherry-stemmed.	This is a constructed, county-maintained road that receives regular and continuous use. Although there is a change in character over the last mile of this route, the entire length to a fence line constitutes a substantially noticeable intrusion and was, therefore, cherry-stemmed.	NO
29	Route LL3A should be determined to be a road.	This route does not appear to have been constructed nor is it maintained. Because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes, the route was determined to be a vehicle way.	NO
30	Six routes identified by San Juan County as SJ 99-55, 58, 59, 60, 61, 62 were not inventoried by BLM. They should be determined to be roads.	Upon further review, a subsequent check of this area confirmed the initial inventory findings, and none of the seismic lines were determined to be vehicle access routes. Field inventory maps noted several old seismic lines (or segments thereof) in this area. These old seismic lines are naturally reclaiming with little evidence of vehicle use.	NO
31	Route BE3A should be	BE3A was not constructed or maintained and	NO

GRAND GULCH (Refer to Map 3-11)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	determined to be a road.	was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	
32	Route BE2F should be determined to be a road.	BE2F is an un-maintained, little driven route that was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
33	Route LL3C should be determined to be a road.	LL3C is a way that is located in an area found lacking wilderness character and does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
34	Comments were received on numerous routes including L2, L3, L4, LL3H, LL4H, LL3G, LL3B, BE3B, and 29 routes identified by San Juan County as SJ 99- 53, 66, 69, 70, 71, 75, 76, 77, 78, 79, 80, 81, 82, 83, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 100, and 102.	The inventoried routes L2-L4, LL3H, LL4H, LL3G, LL3B, and BE3B are all on state lands. SJ99; 53, 66, 69-71, 75-83, 86-98, 100 and 102 are within the existing 603 Grand Gulch ISA Complex or also on state lands.	NO

GRAVEL AND LONG CANYONS (Refer to Map 3-12)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
1	A Road/Way form and fieldwork were not done on this route. From Highway 95 to the 6,800 foot level should be a road, but beyond that, the character changes and it becomes an insignificant vehicle way. A cherry-stem should be placed only on the segment that is a road.	This route was inventoried and noted on the final field map as the boundary road between the existing Cheesebox Canyon WSA and the inventory area. This route was determined to be a road because it meets all criteria of the BLM road definition used for wilderness inventory purposes. Because this is a boundary road that completely separates the existing WSA from the inventory area, it is not cherry-stemmed.	NO
2	A route identified by San Juan County as SJ 95-7 was not recognized by BLM.	Upon further review, this route, identified as FS-1E, was found to be a vehicle way because it is not maintained and does not receive regular and continuous use. The way does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
3	Route L1A should be determined to be a road.	L1A is an un-maintained, little-used, 1.3-mile route that was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
4	BLM has cherry-stemmed route VE2B beyond the point where the route is significant. The last half of the route should not be	VE2B is an old mining route that accesses abandoned prospects. There are several additional vehicle routes, all associated with past mining activity, that branch from a central	YES (See "B" on Map 2-9 in Section II.)

GRAVEL AND LONG CANYONS (Refer to Map 3-12)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
	<p>cherry-stemmed.</p> <p>Another comment stated the entire length of route VE2B was a road, and that the BLM failed to inventory or recognize two road spurs off of VE2B that are identified by San Juan County as SJ 95-11 and SJ 95-12.</p>	<p>stem. Upon further review, it has been determined that cumulatively, the vehicle routes, past mining disturbances, and a wildlife guzzler constitute a substantially noticeable impact on wilderness character. In addition to route VE2B, a larger surrounding area lacking wilderness character has been excluded. This area is similar to the area that was excluded from the previous H.R. 1500 legislative proposal.</p>	
5	<p>A route identified by San Juan County as SJ 95-9 was not inventoried or recognized by the BLM as a road.</p>	<p>Upon further review, this route identified as MS1A and was found to be an un-maintained, seasonally used vehicle way. It does not meet all criteria of the BLM road definition used for wilderness inventory purposes.</p>	NO
6	<p>Route LL1A is an insignificant route and should not be used as a boundary. The boundary should be expanded to the north.</p> <p>Another comment stated route LL1A should be determined to be a road.</p>	<p>Vehicle way LL1A forms the northern boundary of the previous H. R. 1500 legislative proposal that was the focus of the <i>Utah 1999 Wilderness Inventory</i>. Lands beyond this boundary were not inventoried.</p>	NO
7	<p>BLM did not do field work on any of the routes cherry-stemmed in the Jacobs Chair area.</p> <p>Another comment stated that the routes identified by San Juan County as SJ 95-6 (east of Jacobs Chair) and SJ 95-13 (west and east of Jacobs Chair) should be determined to be roads.</p>	<p>Upon further review, the route west of Jacobs Chair, identified as FS-1A, was determined to be a road and cherry-stemmed because it meets all the criteria of the BLM road definition used for wilderness inventory purposes.</p> <p>The route to the east of Jacobs Chair, identified as FS-1B, was determined to a way. It was constructed along the first three miles, but does not receive maintenance or regular and continuous use.</p> <p>In 2002, the field office received information indicating that FS-1B had been sporadically maintained to allow for vehicle traffic from the northern boundary to Jacobs Chair. FS-1B is now considered to be a substantial way that bisects the unit, into two stand alone inventory units.</p>	YES (See "C" and "D" on Map 2-9 in Section II.)
8	<p>A route identified by San Juan County as SJ 95-8 was not inventoried by the BLM, and should be recognized as a road.</p>	<p>Upon further review, this route has been identified as FS-1C and was determined to be a way because it is not maintained and does not meet all criteria of the BLM road definition used for wilderness inventory purposes.</p>	NO
9	<p>A route identified by San Juan County as SJ 95-10 was not inventoried by the BLM, and should be recognized as a road.</p>	<p>Upon further review, this route identified as MR-1A, was determined to be a vehicle way because it does not receive maintenance or regular and continuous use and does not meet all</p>	NO

GRAVEL AND LONG CANYONS (Refer to Map 3-12)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGE
		criteria of the BLM road definition used for wilderness inventory purposes.	

HARMONY FLAT (Refer to Map 3-13)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Two routes identified by San Juan County as SJ 96-8 and 9 were not inventoried by the BLM.	SJ 96-8 and 9 are Highway 95 and State Road 273 respectively. BLM recognizes these roads as inventory area boundaries.	NO
2	Route BV1B was inventoried and recognized as a road in the BLM's analysis.	BV1B is a cherry-stemmed 0.2-mile road that branches from State Road 273 and crosses public land. Because of administrative use, the National Park Service maintains the road.	NO
3	A route identified by San Juan County as SJ 96-4 was not inventoried by the BLM.	This route marks the edge of disturbance between lands with wilderness character and lands lacking wilderness character.	NO
4	A route identified by San Juan County as SJ 96-5 was not inventoried by the BLM.	Upon further review, this route, identified as MS-001, has been determined to be a vehicle way because it was not constructed, is not maintained, and does not receive regular or continuous use.	NO
5	Two routes identified by San Juan County as SJ 96-6 and 7 were not inventoried or identified by the BLM.	These routes are located in an old chaining on state land.	NO
6	Route B should be determined to be a road.	No vehicle use currently occurs on this route because a fence blocks off access. The route is an un-maintained way that is re-vegetating. It was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO

HARTS POINT (Refer to Map 3-14)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	BLM incorrectly cherry-stems a portion of route LF5. The cherry-stem on this route should end at the point maintenance ends.	Upon further review, LF5 forms part of the northern boundary of this inventory area and the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> . At the point that the route enters Harts Draw, the character of this route	YES (See "A" on Map 2-10 in Section II.)

HARTS POINT (Refer to Map 3-14)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	Another comment stated that all of this route identified by San Juan County as SJ 111-37 should be determined to be a road.	changes to an un-maintained, infrequently used way. It does not meet all criteria of the BLM road definition used for wilderness inventory purposes. The cherry-stem on the segment within Harts Draw has been removed.	
2	BLM incorrectly cherry-stems route LF2. The cherry-stem should be removed. Another comment stated that this route identified by San Juan County as SJ 111-31 should be determined to be a road.	Upon further review, LF2 determined to be a road for 1.7 miles and has been cherry-stemmed from the inventory area. The remaining 1.4 miles were determined to be a way because this segment is not maintained and does not receive regular and continuous use. This segment is not cherry-stemmed.	YES (See "F" on Map 2-10 in Section II.)
3	A route identified by San Juan County as SJ 111-33 was not inventoried or recognized by BLM. This route should be determined to be a road.	This 0.2-mile un-maintained spur was inventoried and noted on the inventory map as a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
4	Route Cherry 2 is not maintained and should not be cherry-stemmed.	Upon further review, this route was found to be an un-maintained way that does not meet all criteria of the BLM road definition used for wilderness inventory purposes. The cherry-stem has been removed.	YES (See "G" on Map 2-10 in Section II.)
5	BLM uses this insignificant route as the boundary and a side route to the north is incorrectly cherry-stemmed. The boundary should be expanded and the route should not be cherry-stemmed.	This road (Cherry 1) marks the edge of disturbance between the lands with wilderness character and lands found lacking wilderness character, and forms the boundary of the planning area under study. It was determined to be a road because it meets all criteria of the BLM road definition used for wilderness inventory purposes. Upon further review, the spur route identified as LF4 was found to be a way. It does not meet all criteria of the BLM road definition used for wilderness inventory purposes. The cherry-stem was removed.	YES (See "E" on Map 2-10 in Section II.)
6	A route identified by San Juan County as SJ 111-32 was not inventoried, but was cherry-stemmed. Another comment stated that this same route should not be cherry-stemmed	Upon further review, this 1.6-mile route, identified as LF3, has been determined to be a road because it meets all criteria of the BLM road definition used for wilderness inventory purposes. The cherry-stem remains.	NO
7	A route identified by San Juan County as SJ 111-34 was not inventoried or recognized by the BLM. This route should be determined to be a road.	This 0.4-mile route identified as HP-18 was determined to be a vehicle way because it is not maintained and, therefore, does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO

HARTS POINT (Refer to Map 3-14)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
8	Two routes identified by San Juan County as SJ 111-35 and 36 were not inventoried or recognized by the BLM. These routes should be determined to be roads.	Upon further review, this area was reexamined, and while faint cross country tracks were noted, no discernable vehicle routes were found. Neither SJ 111- 35 or 36 were identified as viable travel routes.	NO
9	A route identified by San Juan County as SJ 111-38 was not inventoried or recognized by the BLM. This route should be determined to be a road.	Upon further review, this 1.1-mile spur route identified as LF1 was determined to be a vehicle way because it is little use and not maintained and, therefore, does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
10	BLM should cherry-stem only significant routes and include the rest of Harts Point in the WSA. Deep canyons would separate the cherry-stems so no cumulative impacts would be present.	Much of this area lacks wilderness character because of the cumulative impacts of vehicle ways, seismic exploration lines, fences, a borrow pit, stock ponds and other developments. However, upon further review an area approximately 8,313 acres in size in the southwest portion has been determined to possess wilderness character.	YES (See “D” on Map 2-10 in Section II.)
11	SJ 111-30 was not inventoried or recognized by the BLM. This route should be determined to be a road.	This route is on state land and not on land that has wilderness character.	NO

INDIAN CREEK (Refer to Map 3-15)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Route VKS1A should be determined to be a road.	VKS1A is an un-maintained route that was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
2	BLM incorrectly cherry-stems this route, which BLM field-work describes as “very faint.”	Upon further review, this cherry-stem, identified as LF1C, has been removed. While initially constructed, this short spur leading to an old drill pad has largely reclaimed. This way does not receive regular or continuous use and is un-maintained; therefore it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	YES (See “A” on Map 2-11 in Section II.)
3	A route identified by San Juan County as SJ 110-31 was not inventoried or recognized by the BLM. This route should be determined to be a road.	This route was inventoried and noted on inventory maps. It forms the edge of disturbance of an area lacking wilderness character because of impacts associated with previous mining activities. It was determined to be a way because it does not meet all criteria of the BLM road	NO

INDIAN CREEK (Refer to Map 3-15)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
		definition used for wilderness inventory purposes.	
4	Route S3B was recognized as a road but was not cherry-stemmed.	This short stub and drill pad are excluded as part of the Lockhart Canyon Road cherry-stem.	NO
5	A route identified by San Juan County as SJ 110-30 was not inventoried; however, it was cherry-stemmed by the BLM.	Upon further review, this route, identified as F001, was determined to be a way because it is little-used and un-maintained, and, does not meet all criteria of the BLM road definition used for wilderness inventory purposes. The cherry-stem has been removed.	YES (See "E" on Map 2-11 in Section II.)
6	A route identified by San Juan County as SJ 110-29 was not inventoried or recognized by the BLM. This route should be determined to be a road.	Upon further review, this route was identified as MS-1B and determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
7	BLM's Road/Way form confirms that route S2K, is not mechanically maintained but maintained by passage. The route should not be called a road and should not be cherry-stemmed.	This 0.3-mile loop route, which branches from S2I, is quite distinct and constitutes a substantially noticeable impact on wilderness character. For this reason, the cherry-stem remains on this vehicle way in association with route S2I.	NO
8	Routes S2J and S2I should not be recognized as roads and should not be cherry-stemmed.	These two segments connect to form one route between the Lockhart Basin Road and Canyonlands National Park. This route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. However, it was cherry-stemmed because it constitutes a substantially noticeable impact on wilderness character.	NO
9	A route identified by San Juan County as SJ 110-27 was not inventoried or recognized by the BLM. This route should be determined to be a road.	This short route was inventoried and determined to be an eroded dugway. The dugway is not maintained and receives no use; therefore, it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
10	BLM's Road/Way form confirms that route S2G, is not mechanically maintained, but maintained by vehicle use. The route should not be called a road and should not be cherry-stemmed.	This 0.6-mile vehicle way is a well-established route that leads to a larger disturbed area previously used for oil and gas exploration. Cumulatively, the intrusion created by the drill pad and the route is a substantially noticeable impact on wilderness character and has been cherry-stemmed.	NO
11	BLM's Road/Way form confirms that route S2E, is not mechanically maintained, but maintained by passage. The reclaimed landing strip is not a significant impact. The route	This 1.3-mile route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. However, it constitutes a substantially noticeable impact on wilderness character and has been cherry-stemmed. The	NO

INDIAN CREEK (Refer to Map 3-15)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	should not be cherry-stemmed.	landing strip is on state land and is not subject to this inventory.	
12	Route S2F should be determined to be a road.	This 0.1-mile spur route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	
13	BLM's Road/Way form confirms that route S3C, is not mechanically maintained, but maintained by passage. The route should not be called a road and should not be cherry-stemmed. Another comment stated that the segment of route S3C (identified as SJ 110-24) beyond the cherry-stem was not inventoried and should be identified as a road.	This route was identified as a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. However, the first 0.5 miles of this way has been cherry-stemmed because, in combination with a stock pond, fence, and an earthen stock loading ramp to which it leads, it constitutes a substantially noticeable impact on natural character. Beyond the range developments, the remaining 0.2 miles of this vehicle way changes character and is not cherry-stemmed because it is far less distinct.	
14	A route identified by San Juan County as SJ 110-25 was not inventoried or recognized by the BLM. This route should be determined to be a road.	Upon further review, this area was re-examined but no vehicle route was located at the site indicated by the comment.	
15	Route S4A should be determined to be a road.	This route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	
16	BLM uses an insignificant route as the boundary. The boundary should be expanded and the mining impacts should be cherry-stemmed.	This boundary in this area is shaped by numerous features: Indian Creek, two different vehicle ways, and two areas of extensive OHV disturbance. In combination, all of the above referenced features mark the edge of disturbance. It is the most appropriate boundary in this instance to separate lands found to have wilderness character from lands lacking wilderness character.	
17	Route S2A should be determined to be a road.	This 1.5-mile route is a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. S2A was not constructed or maintained.	
18	Route S2B should be determined to be a road. Another comment was received stating the route was not substantial and should not be used as a boundary.	This vehicle way marks the boundary of the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> . It was determined to be a vehicle way because it was not constructed or maintained, and does not receive regular and continuous use.	
19	Route S2D should be determined to be a road.	S2D was established through vehicle use; it was determined not to be maintained and does not	

INDIAN CREEK (Refer to Map 3-15)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	Another comment was received stating the route was not substantial and should not be used as a boundary.	meet the all criteria of the BLM road definition used for wilderness inventory. S2D is a substantial impact on naturalness and was determined to be a substantially noticeable way.	
20	A route identified by San Juan County as SJ 110-26 was not inventoried or recognized by BLM. The route should be determined to be a road.	SJ110-26 is part of an old air strip that is located on state land.	

MANCOS MESA (Refer to Map 3-16)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Route MM2 should not be classified as a road and should not be used as a boundary. The boundary should be expanded.	The Red Canyon Road is in an area found to lack wilderness character.	NO
2	BLM did not use significant impacts when drawing the boundary. Aerial photos show the area under the rim is not entirely impacted by mining activity. This area is returning to a natural state and should be included in the area found to have wilderness character.	This area (lands located between the cliff line and the Red Canyon Road mentioned above) is marred by mining activities that impact the area's natural character. Upon further field review, approximately 600 additional acres were found not to have wilderness character due to extensive mining impacts.	YES (See "G" on Map 2-12 in Section II.)
3	Route MM1 should be determined to be a road.	The route through Moqui Canyon was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. The segment of this route that descends down a long series of switchbacks has become impassable, the route is not maintained, and it does not receive regular or continuous use.	NO
4	BLM did not inventory or recognize a route identified by San Juan County as SJ 97-15. This route should be determined to be a road.	The initial 125 yards of this spur is included within the main road cherry-stem. The segment of this route beyond the initial 125 yards is nearly impassable and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
5	BLM incorrectly cherry-stems the entire length of route MM-7. The last mile of the route on the east fork is not maintained and should not be cherry-stemmed.	Upon further review, this route was found to be a constructed, maintained, well-established road that meets all criteria of the BLM road definition used for wilderness inventory purposes. The cherry-stem has been retained.	YES (See "F" on Map 2-12 in Section II.)
6	BLM did not inventory a route	This route was noted on the inventory map and	NO

MANCOS MESA (Refer to Map 3-16)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	identified by San Juan County as SJ 97-17. This route should be determined to be a road.	was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	
7	A route identified by San Juan County as MM6A should be determined to be a road	Upon further review, this route was reexamined, identified as MM-9 and found to be a little-used route that fades in appearance as it traverses patches of slick rock. The route was determined to be a way because it is un-maintained and does not receive regular and continuous use.	NO
8	BLM did not inventory or recognize a route identified by San Juan County as MM6B. The route should be determined to be a road.	This route was identified as MM6 on the field inventory map and determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. This way was not constructed or maintained, and does not receive regular and continuous use.	NO
9	A route identified by San Juan County as MM6E should be determined to be a road.	Upon further review, this route has been identified as MM8A and determined to be a vehicle way that constitutes a substantially noticeable impact on wilderness character. The way has been cherry-stemmed.	YES (See "E" Map 2-12 in Section II.)
10	A route identified by San Juan County as MM6d should be determined to be a road.	Upon further review, this route identified as MM8 and was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. It does not receive maintenance or regular and continuous use.	NO
11	BLM did not inventory or recognize route SJ 97-16. This route should be determined to be a road.	This route, identified by the BLM as MM-11, accesses an old gravel pit. Upon further review this route was determined to be a road and, in combination with the gravel pit, has been cherry-stemmed.	YES (See "D" on Map 2-12 in Section II.)
12	Route MM3 should be determined to be a road.	This route is within an area that does not have wilderness character because of cumulative impacts on public lands associated with a neighboring ranch operation.	YES (See "C" on Map 2-12 in Section II.)
13	BLM did not inventory or recognize route as SJ 97-18. This route should be determined to be a road.	This area was inventoried but no discernable vehicle route was found at this location.	NO
14	BLM did not inventory or recognize routes SJ 97-8, 9, 10, 11, 12, 13, and 14. The routes should be determined to be roads.	SJ 97-8, 9, 10, 11, 12, 13, and 14 are all within the existing Mancos Mesa WSA or within state lands that are outside the scope of this inventory.	NO

NOKAI DOME (Refer to Map 3-17)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES

NOKAI DOME (Refer to Map 3-17)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Route ND2 should be determined to be a road.	ND2 is a 0.5-mile little-used, un-maintained route that was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
2	Route ND3 should be determined to be a road.	ND3 is a 1.5-mile route that is not maintained and does not receive regular or continuous use. It is the remnant of an historic wagon route that in several places has totally reclaimed. This trail was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
3	BLM did not inventory or recognize a route identified by San Juan County as SJ 98-26.	This route, identified as ND-28, was determined to be a road because it meets all criteria of the BLM road definition used for wilderness inventory purposes. It forms a segment of the inventory area boundary.	NO
4	BLM did not inventory or recognize a route identified by San Juan County as SJ 98-27.	This 0.6-mile route, identified as ND-29, receives little use, is not maintained, and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
5	Route ND14 should be determined to be a road.	This route is not maintained. It does not receive regular or continuous use and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
6	The west spur route branching from ND-15 should not be cherry-stemmed.	Upon further review, this 1.4-mile well-established route, identified as ND-25 that accesses an abandoned drill hole, was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. However, it has been cherry-stemmed because the way and drill pad, cumulatively constitute a substantially noticeable impact on natural character.	NO
7	BLM did not inventory the route that leads to a corral. This route should be cherry-stemmed.	Upon further review, this 0.1-mile route, identified as ND-33, was inventoried and noted as a cherry-stem on the inventory map; however, the cherry-stem was inadvertently left off the map in the <i>1999 Utah Wilderness Inventory</i> . This is a mapping error that has since been corrected.	YES (See "A" on Map 2-13 in Section II.
8	Route ND17 should be determined to be a road.	This little-used route (found to be washed out and nearly impassable beyond the 0.2-mile point at the time of inventory) was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
9	Route ND-4 should not be	This route is part of the Hole in the Rock Trail.	NO

NOKAI DOME (Refer to Map 3-17)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	cherry-stemmed. The Road/Way form confirms that this route is not maintained and is “very rough.”	While this route does not meet all the criteria of BLM’s road definition used for wilderness inventory purposes because it is not maintained, this vehicle way was initially constructed, receives regular use, and constitutes a substantially noticeable impact on wilderness character. Therefore, the route has been cherry-stemmed.	
10	BLM did not inventory or recognize a route identified by San Juan County as SJ 98-25.	This short, 0.2-mile way that accesses a mineral material pit has been inventoried. Both have been cherry-stemmed because cumulatively they constitute a substantially noticeable intrusion.	YES (See “J” on Map 2-13 in Section II.)
11	Route ND13 should be determined to be a road.	Upon further review, the Castle Creek route was determined to be a road and has been cherry-stemmed, because it is constructed and maintained.	YES (See “C” on Map 2-13 in Section II.)
12	BLM did not inventory or recognize a route identified by San Juan County as SJ 98-29.	This 0.6-mile route has been inventoried, identified as ND-24, and found to be a little-used, un-maintained vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
13	BLM did not inventory or recognize a route identified by San Juan County as SJ 98-28.	This route has been inventoried and determined to be a cross-country trail and is not a vehicle route.	NO
14	Route ND5 should be determined to be a road.	This faint, un-maintained, seldom-used 0.5-mile route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition.	NO
15	The BLM field map shows the ND-7 cherry-stem ending at one point, while the GIS map shows the cherry-stem ending 0.5 miles further up the canyon. The cherry-stem should end before the route reaches the canyon bottom. Another comment stated that ND-7 should be a road.	This route was determined to be a vehicle way because it was not constructed or maintained, and does not receive regular and continuous use. The first 0.3 miles of the route is cherry-stemmed because this portion constitutes a substantially noticeable impact on natural character. The length of the cherry-stem was incorrectly shown on the map in the <i>1999 Utah Wilderness Inventory</i> , and has been corrected. Beyond the initial 0.3 miles, the vehicle way becomes less distinct and is not cherry-stemmed.	YES (See “H” on Map 2-13 in Section II.)
16	Route ND-9 should be determined to be a road.	This route was found to be a very rough, little-used, un-maintained vehicle way that does not meet all criteria of the BLM road definition used for wilderness inventory purposes. A subsequent field check verified this initial determination.	NO
17	BLM did not inventory or recognize a route identified by San Juan County as SJ 98-30.	This 0.3-mile route has been inventoried and found to be a little-used, un-maintained vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
18	BLM did not inventory or	These two vehicle ways, identified as ND-25A	NO

NOKAI DOME (Refer to Map 3-17)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
	recognize routes identified by San Juan County as SJ 98-21 and 98-22.	(SJ 98-21) and ND-26 (SJ-98-22), were inventoried and identified on the inventory map. They were determined to be ways because they do not meet all criteria of the BLM road definition used for wilderness inventory purposes. These ways do not receive maintenance or regular and continuous use.	
19	Route ND-18 should be determined to be a road.	This route is not maintained, receives limited use, and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
20	Route ND-10 should be determined to be a road.	This un-maintained route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
21	The entire route identified by San Juan County as SJ 98-20 should be determined to be a road.	Upon further review, the initial 0.15 miles of this route, identified by BLM as ND-19, that leads to a windmill is substantially noticeable and was determined to be a road because it meets all criteria of the BLM road definition used for wilderness inventory purposes. Beyond the windmill, the route was determined to be a vehicle way because it is not maintained on this portion of the route. The 0.15 mile segment and the windmill have been cherry-stemmed.	YES (See "D" on Map 2-13 in Section II.)
22	Route ND-11 should be determined to be a road.	This 1.5-mile route is not maintained, receives limited use, and was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
23	BLM fails to complete separate Road/Way forms for each route. Routes ND-8 and others are not roads. Another comment stated that routes identified by San Juan County as SJ 98- 23 and 24 at the end of ND-8 should be determined to be a roads.	Upon further review, these routes have been identified as ND-20, ND-21 and ND-22 respectively. ND-20 (SJ 98-24) and ND-22 were determined to be little-used, un-maintained ways because they do not meet all criteria of the BLM road definition used for wilderness inventory purposes. The cherry-stem was removed from ND-22. ND-21 (SJ 98-23) was determined to be a road for approximately 1-mile because it meets all the criteria of the BLM road definition used for wilderness inventory purposes. The one-mile road segment has been cherry-stemmed and the route has been realigned in this location to reflect better mapping data.	YES (See "E" and "F" on Map 2-13 in Section II.)

ROAD CANYON (Refer to Map 3-18)

#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Route CB1B should be determined to be a road.	This 0.1-mile route was determined to be a way because it is not maintained. It was cherry-stemmed because it constitutes a substantially noticeable impact on natural character.	NO
2	Route CB1E should be determined to be a road.	This very short un-maintained 0.07-mile route was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
3	BLM did not inventory or recognize a route identified by San Juan County as SJ 101-36. This route should be determined to be a road.	Upon further review, this 0.3-mile route, identified as FV6D, has been determined to be a road to a point where it meets a wash within a state section. As a result of the road determination, approximately 45 acres have been severed from the area with wilderness character. Beyond the wash, however, the route changes character, is not maintained, does not receive regular or continuous use and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	YES (See "A" on Map 2-14 in Section II.)
4	BLM did not inventory or recognize routes identified by San Juan County as SJ 101-26, 27, 28. The routes should be determined to be roads.	These routes have been inventoried and noted on the inventory maps as pioneering woodcutting routes. They have been established by the removal of selected trees, branches to allow for vehicle passage. The routes are cross country in nature and are located in the area with no wilderness character, but they are beginning to encroach on the area with wilderness character.	NO
5	Route CB2E should be determined to be a road.	CB2E is a 0.1-mile route that was not constructed or maintained and determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
6	Route CB2C should be determined to be a road.	CB2C is a 0.1-mile route that was determined to be a way because it was not constructed or maintained, and does not receive regular and continuous use. The way does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
7	BLM did not inventory or recognize a route identified by San Juan County as SJ 101-35. This route should be determined to be a road.	Upon further review, this route, identified as FV6C, does not appear to have been constructed, is not maintained and was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
8	BLM did not inventory or recognize the following routes identified by San Juan County as SJ 101-19, 31, 32. These routes should be determined to be roads.	Upon further review, one of these routes, identified as FV6A (SJ 101-31) has been found to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. It is, however, a substantial impact on wilderness character, and has been cherry-stemmed in conjunction with	YES (See "B" on Map 2-14 in Section II.)

ROAD CANYON (Refer to Map 3-18)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
		<p>the two-acre stock pond that it accesses.</p> <p>San Juan County route SJ 101-32 could not be located on the ground.</p> <p>Another route, identified as FV6B (SJ 101-19), was found to be a little-used track that is not maintained and was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.</p>	
9	BLM did not recognize a route identified by San Juan County as SJ 101-34. This route should be determined to be a road.	This area was inventoried but no vehicle route was found.	NO
10	BLM did not recognize a route identified by San Juan County as SJ 101-39. This route should be determined to be a road.	This area was inventoried but no vehicle route was found.	NO
11	Route CB1G should be determined to be a road	This less than 0.1-mile un-maintained route (found to be washed out and nearly impassable at the time of field inventory) was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
12	BLM did not inventory or recognize a route identified by San Juan County as SJ 101-33. This route should be determined to be a road.	This 0.5-mile route was inventoried and identified on the field inventory map. This route accesses an old drill hole and stock pond. It was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. The way, cumulatively with the stock pond, is a substantially noticeable impact on natural character and was cherry-stemmed.	NO
13	This area is free of impacts and should have been added to the area with wilderness character.	This area is outside of the of the previous H.R. 1500 legislative boundary that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
14	Route CB2B should be determined to be a road.	This 0.2-mile route was found to be a little-used, un-maintained vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. Beyond 0.2 miles the way is located on state lands.	NO
15	Routes BL2H, CB2A, BL2I, and nine routes identified by San Juan County as SJ 101-20, 21, 22, 23, 25, 29, 37, 38, and 40 should be determined to be roads.	BL2H is an existing cherry-stem and along with BL2I are within the existing WSA. CB2A is located on state land. SJ-101 21, 22 and 23 are existing cherry-stems in the WSA. SJ-101-20, 29, 37, 38 and 40 are also within the existing WSA. SJ-101-25 is on state land. None are within the scope of this inventory.	NO

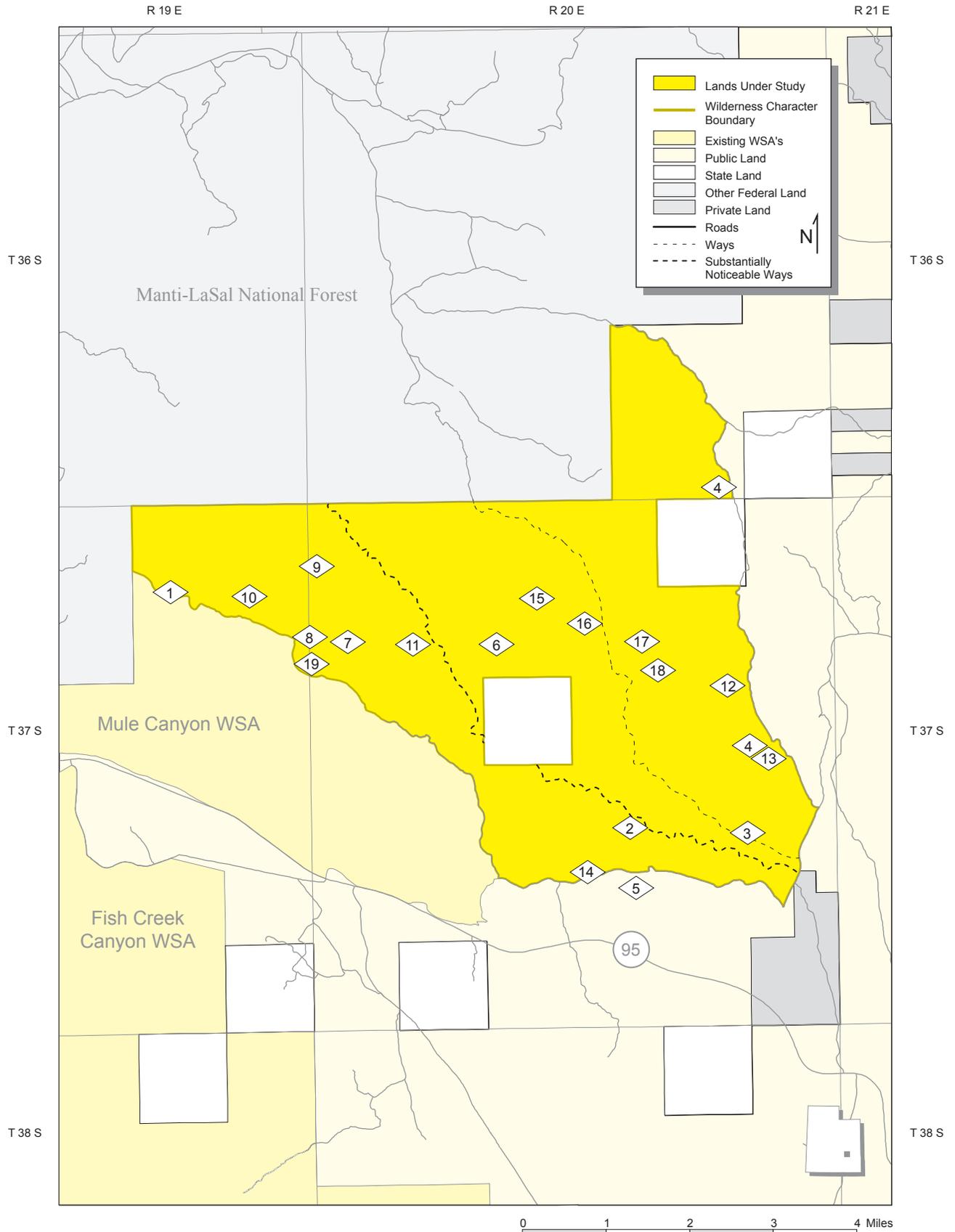
SAN JUAN RIVER (Refer to Map 3-19)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Route VE1B should be determined to be a road.	This faint, un-maintained 0.4-mile route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
2	Route VE1D should be determined to be a road.	This faint, un-maintained 0.5-mile route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
3	Route BL1J should be determined to be a road.	This un-maintained 2.9-mile route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
4	BLM did not inventory or recognize a route identified by San Juan County as SJ 102-23. This route should be determined to be a road.	Upon further review, this 0.2 mile route has been identified as SJR-3, and determined to be a vehicle way because it does not meet all the criteria of the BLM road definition used for wilderness inventory purposes. SJR-3 was not constructed, not maintained, and does not receive regular and continuous use.	NO
5	BLM did not inventory or recognize a route identified by San Juan County as SJ 102-24. This route should be determined to be a road.	Upon further review, this 0.1 mile route was identified as SJR-4, and determined to be vehicle way because it does not meet all the criteria of the BLM road definition used for wilderness inventory purposes. SJR-4 was not constructed or maintained.	NO
6	BLM's road/way form confirms that routes VE2E and VE2D are not maintained. These routes are incorrectly classed as roads and they should not be cherry-stemmed.	These two vehicle ways do not meet all criteria of the BLM road definition used for wilderness inventory purposes, but they are well-established, regularly-used routes that access a scenic overlook of the San Juan River. They were cherry-stemmed because they constitute a substantially noticeable impact on natural character.	NO
7	Route VE2F should be determined to be a road.	This 0.6-mile un-maintained route is a loop connector between VE2E and VE2D that was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
8	BLM did not inventory or recognize a route identified by San Juan County as SJ 102-22. This route should be determined to be a road.	Upon further review, this 2.2-mile route, identified as SJR-1, was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO

SHEEP CANYON (Refer to Map 3-20)

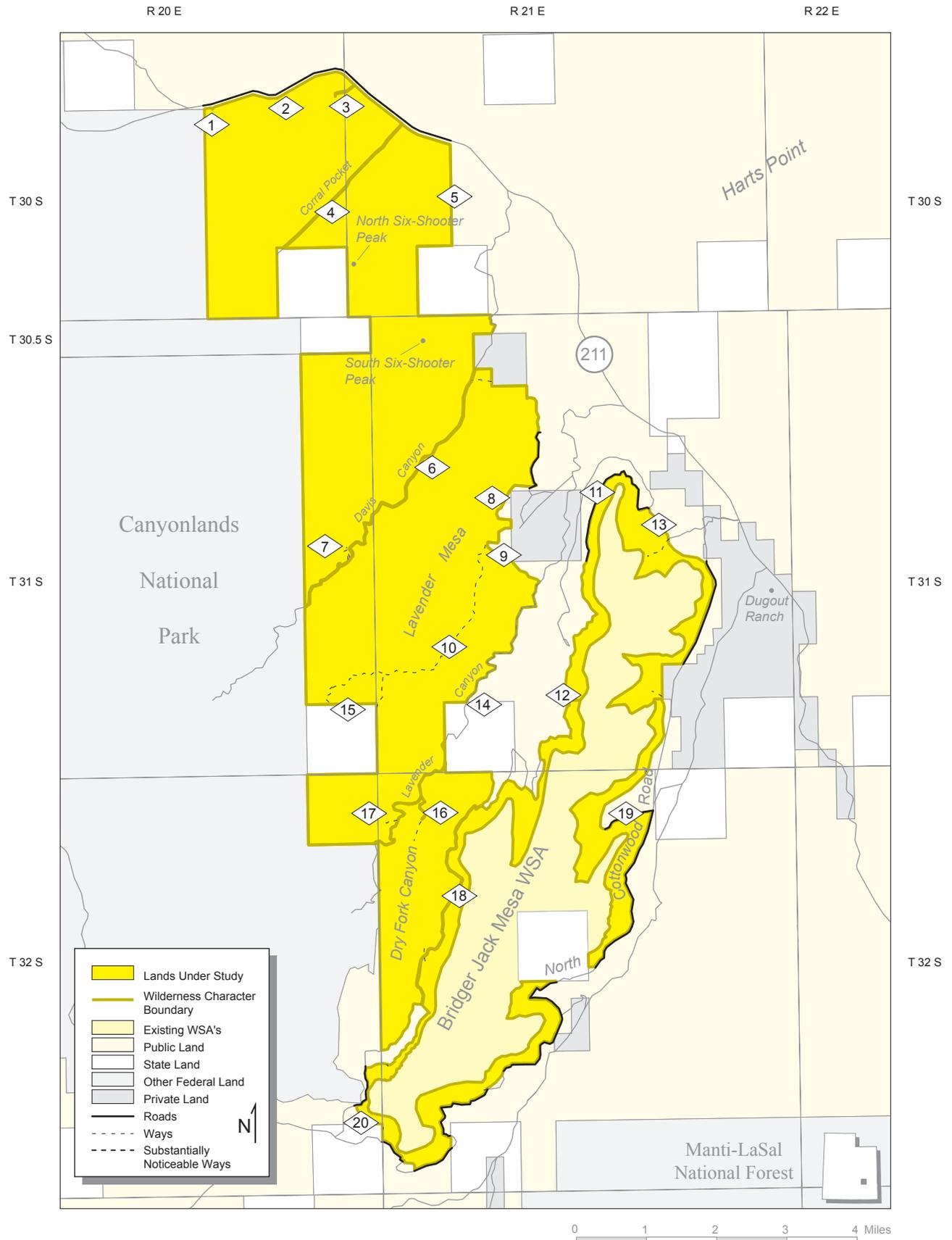
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	A route identified by San Juan County as SJ 108-1 was not inventoried but was cherry-stemmed from the inventory area.	This 0.2-mile constructed road accesses the Sundance Trailhead, a popular entry point for hiking Dark Canyon. The stock pond was included within the cherry-stem on inventory maps, but inadvertently omitted from the maps in the <i>1999 Utah Wilderness Inventory</i> . A field review has modified the cherry-stem along this route to include the stock pond and small trailhead parking area.	YES (See "A" on Map 2-15 in Section II.)
2	BLM used this entire route as a boundary even though it becomes impassable. The route should only be cherry-stemmed to where it becomes impassable.	A road and vehicle way collectively forms the eastern boundary of this inventory area. This is also the boundary of the previous H.R. 1500 legislative boundary that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO

SQUAW AND PAPOOSE CANYON (Refer to Map 3-21)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
1	Route B2D should be determined to be a road.	This un-maintained spur route was determined to be a way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes. At the 0.2-mile point the route is almost impassible.	NO
2	Route B2B should be determined to be a road.	This 1.8-mile route has been washed out and was determined to be a vehicle way because it does not receive maintenance or regular and continuous use.	NO
3	BLM did not inventory or recognize a route identified by San Juan County as SJ 105-9. This route should be determined to be a road.	Upon further review, this route, identified as SP1A, was identified on the inventory map and cherry-stemmed. It was determined to be a road because it meets all criteria of the BLM road definition used for wilderness inventory purposes.	NO
4	BLM did not recognize a route identified by San Juan County as SJ 105-8. This route should be determined to be a road.	This area was inventoried and no discernable vehicle route was found.	NO
5	Route B2E should be determined to be a road.	This un-maintained 0.2-mile spur route was determined to be a vehicle way because it does not meet all criteria of the BLM road definition used for wilderness inventory purposes.	NO
6	Route B2C should be determined to be a road.	This route was determined to be a vehicle way because it does not receive maintenance or regular and continuous use. This vehicle way forms part of the boundary between the inventory area and the existing Squaw and Papoose Canyon WSA.	NO
7	Route B2A should be determined to be a road.	This un-maintained 0.2-mile spur route was determined to be a vehicle way because it does	NO

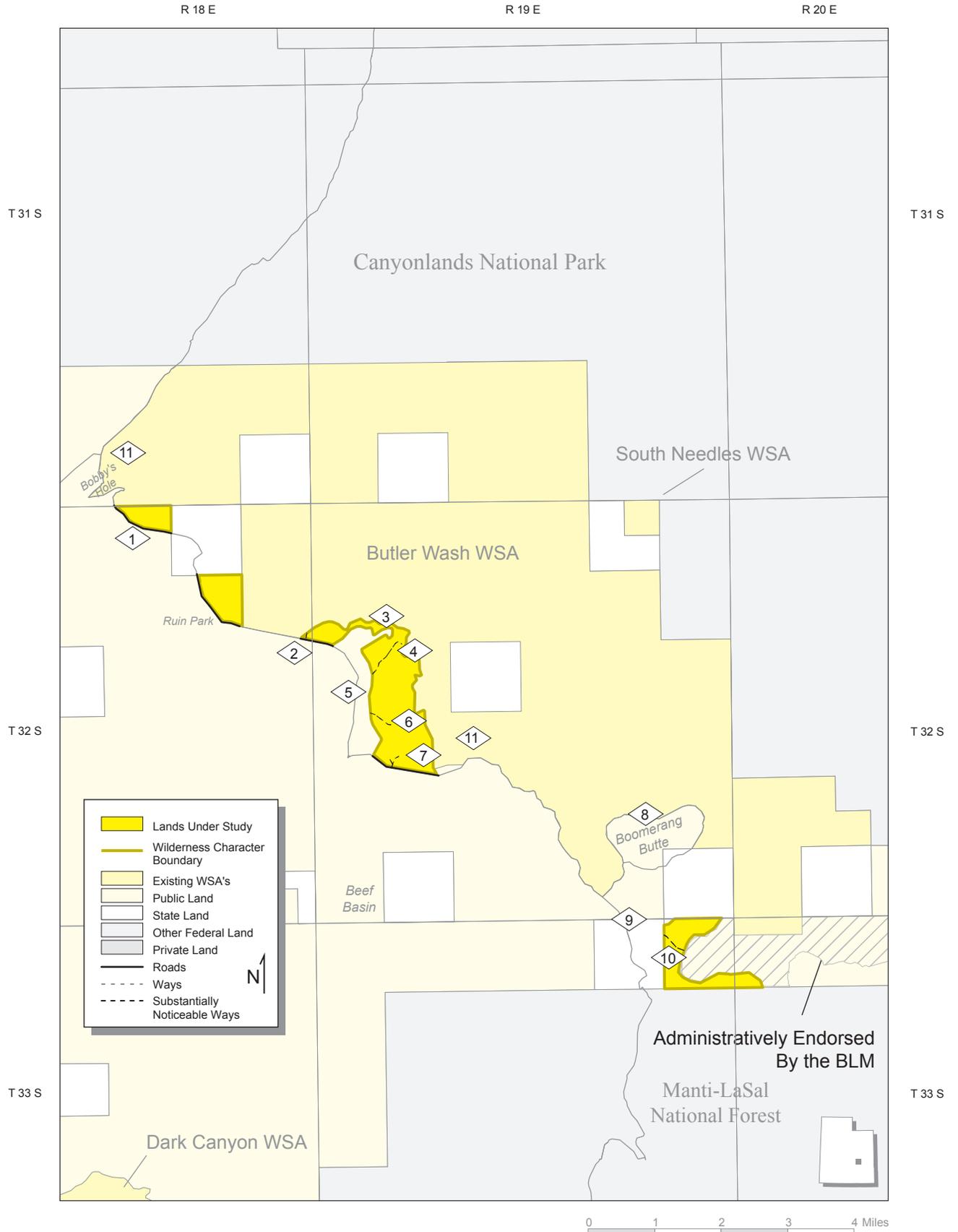
SQUAW AND PAPOOSE CANYON (Refer to Map 3-21)			
#	PUBLIC COMMENTS	BLM RESPONSE: INVENTORY REVIEW RESULTS	INVENTORY CHANGES
		not meet all criteria of the BLM. This route forms a portion of the boundary between the existing Squaw/Papoose WSA and the inventory area.	
8	BLM's wilderness character boundary follows section lines and a pack trail, which are not significant impacts. The boundary should be expanded.	The pack trail forms the boundary of the existing WSA and the previous H.R. 1500 legislative proposal that was the focus of the <i>1999 Utah Wilderness Inventory</i> .	NO
9	BLM did not inventory or recognize a route identified by San Juan County as SJ 105-6. This route should be determined to be a road.	This route is on state land and extends into the existing Squaw/Papoose Canyon WSA.	NO
10	BLM did not inventory or recognize a route identified by San Juan County as SJ 105-7. This route should be determined to be a road.	This route is entirely on state land.	NO



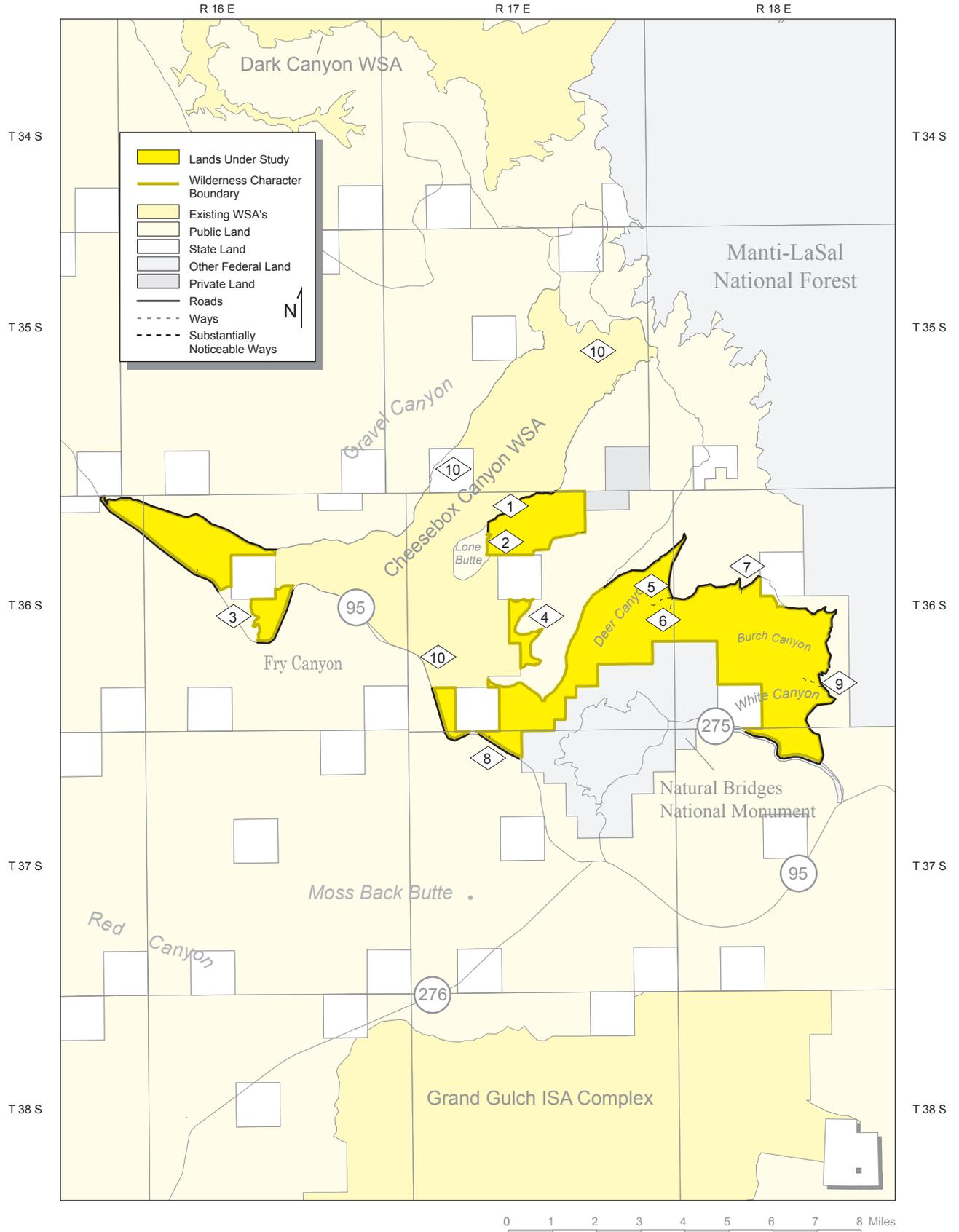
MAP 3.1



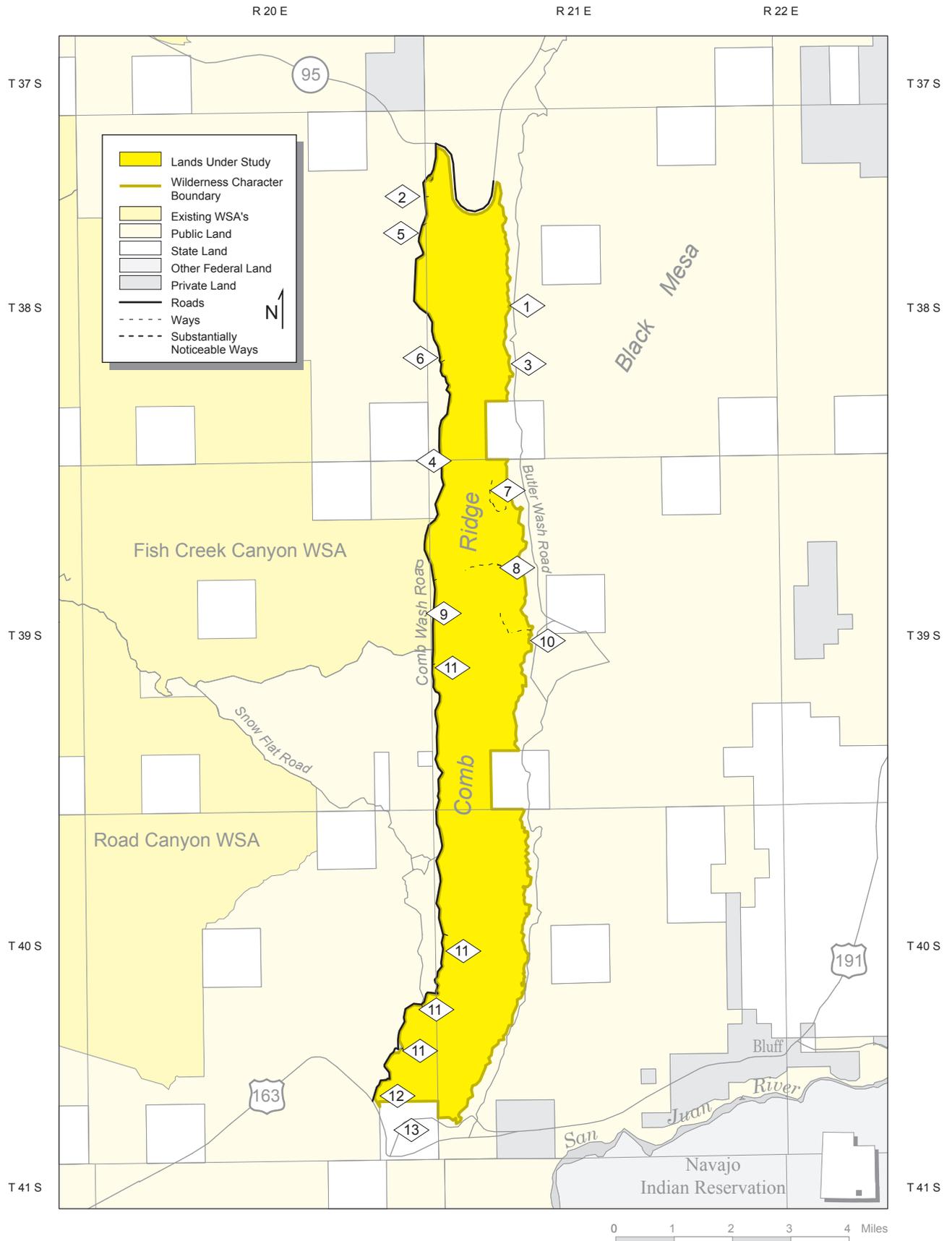
MAP 3.2



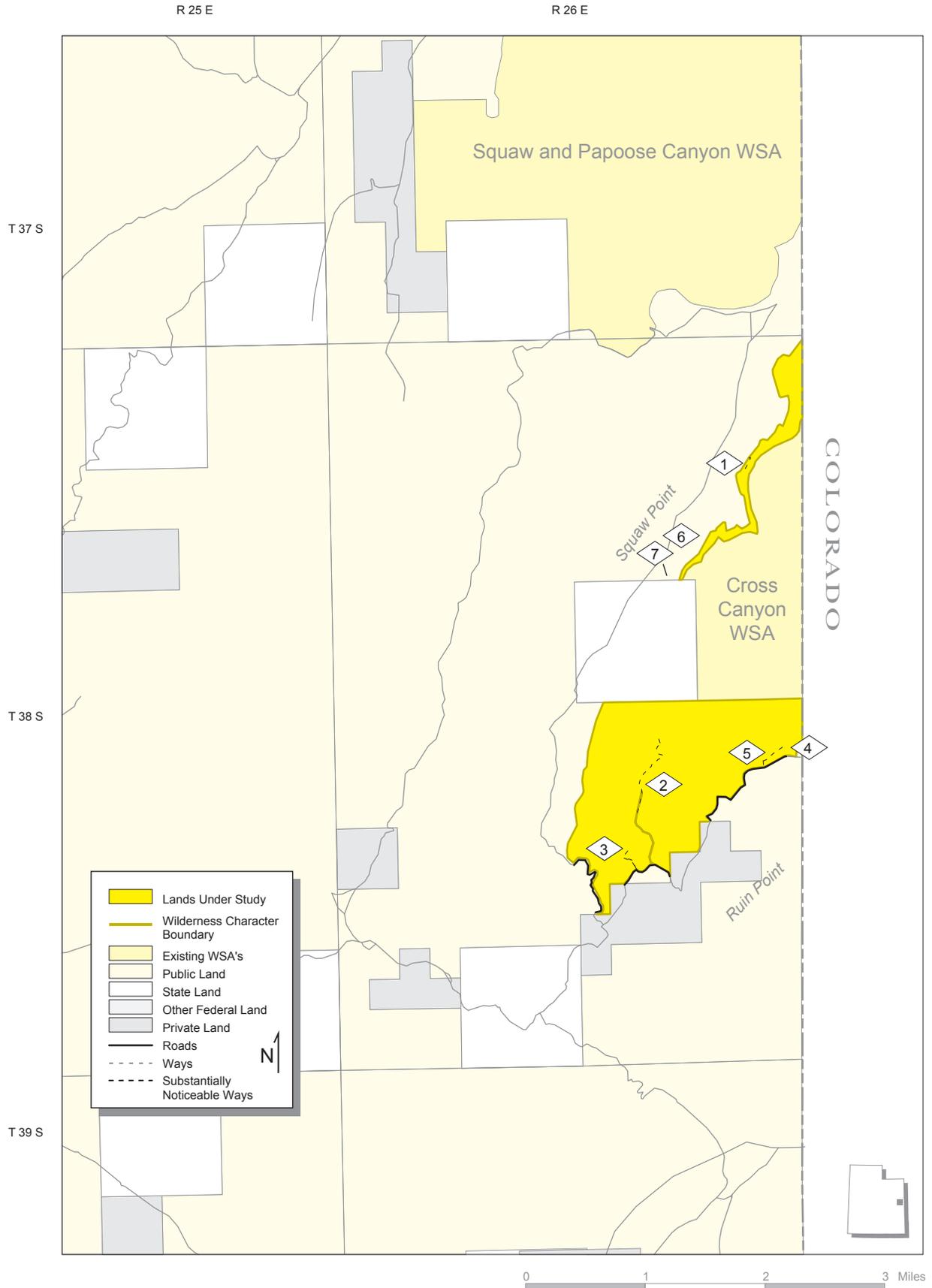
MAP 3.3



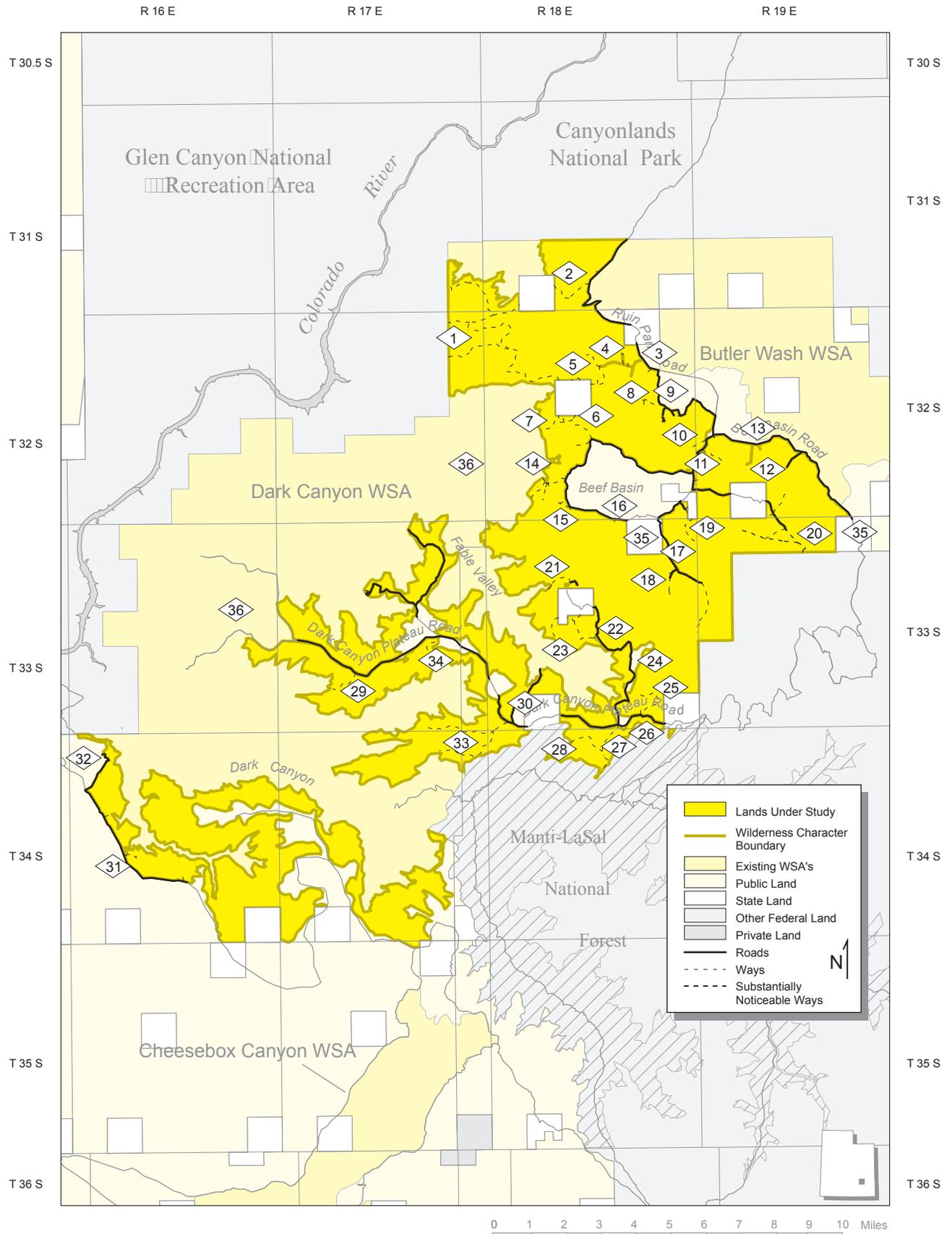
MAP 3.4



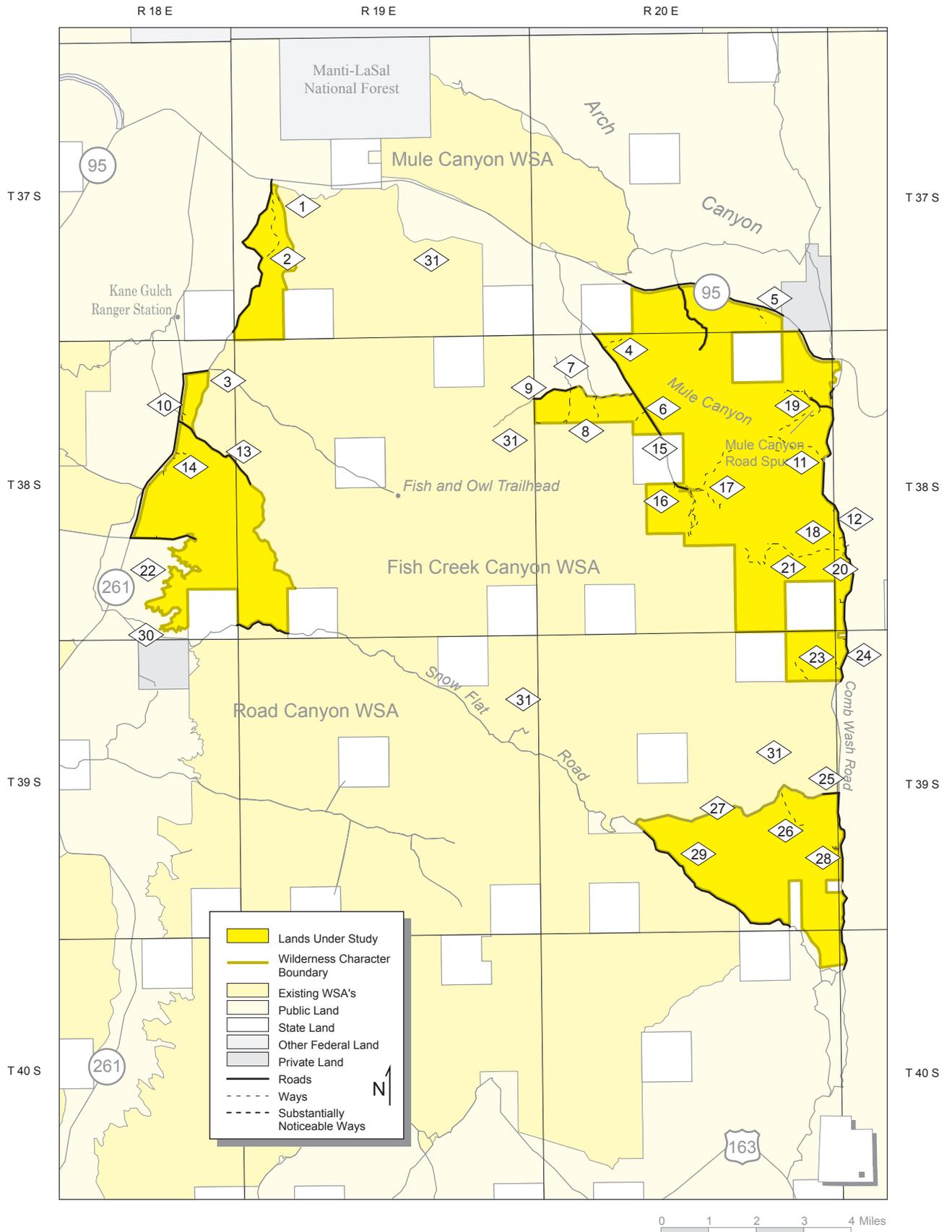
MAP 3.5

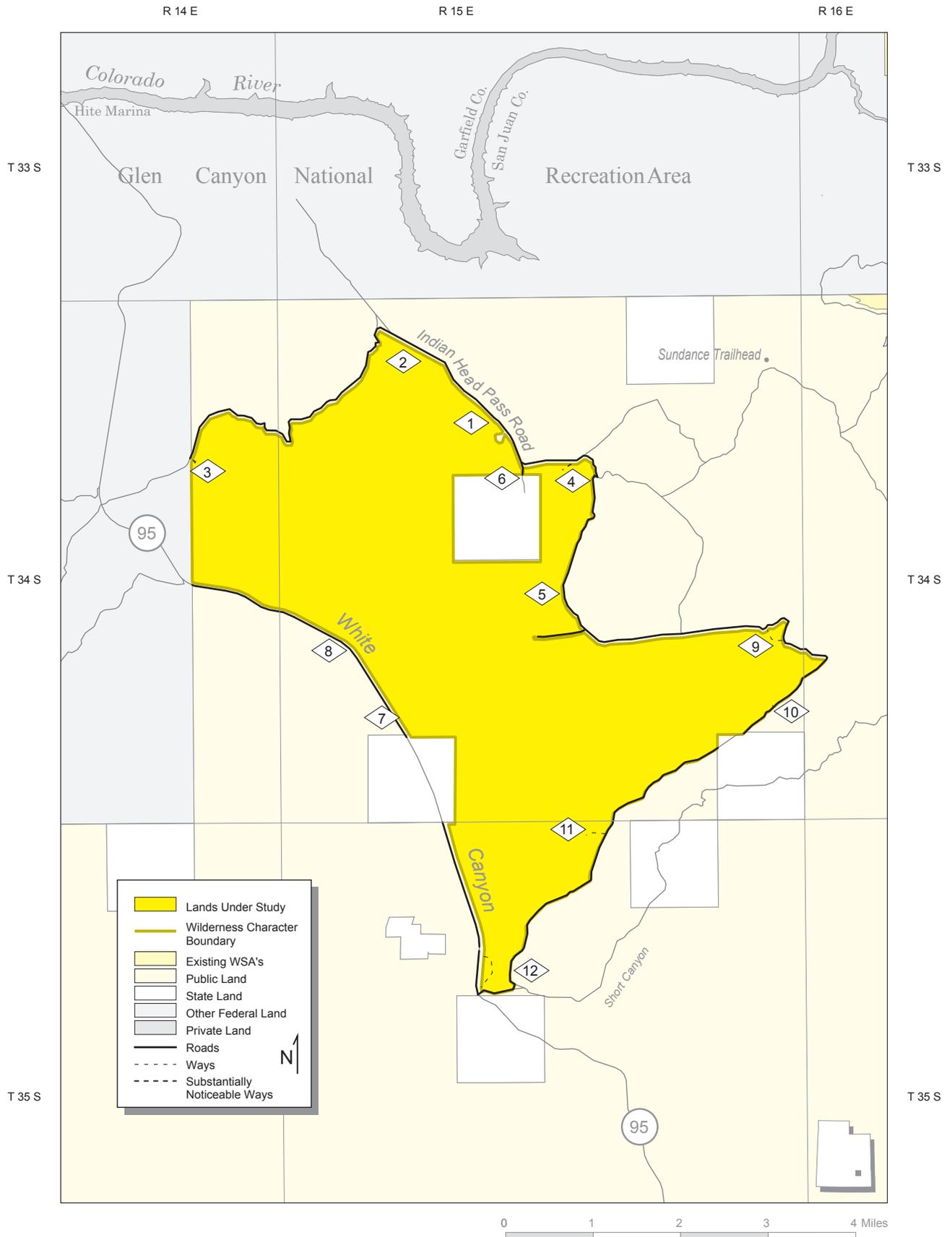


MAP 3.6

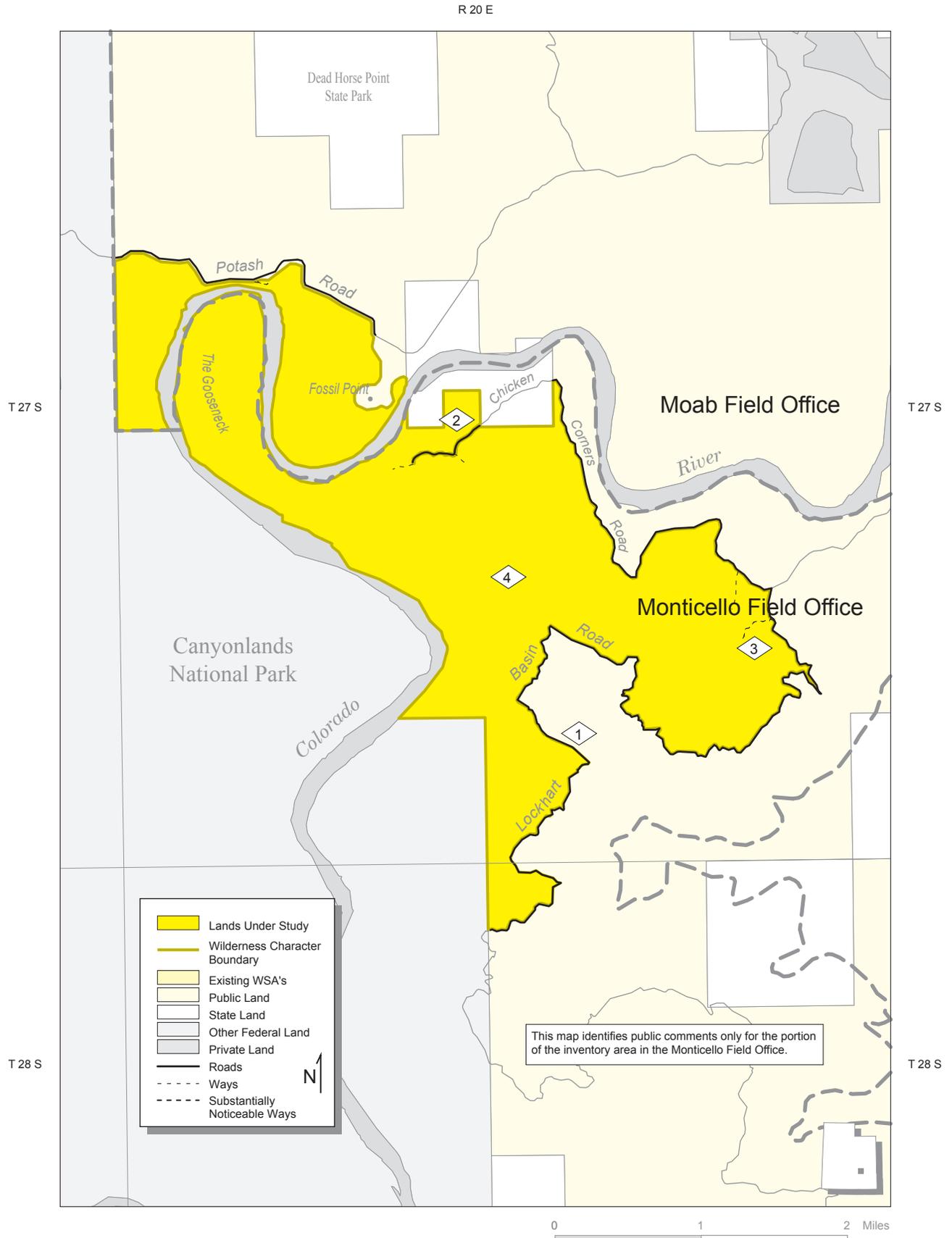


MAP 3.7

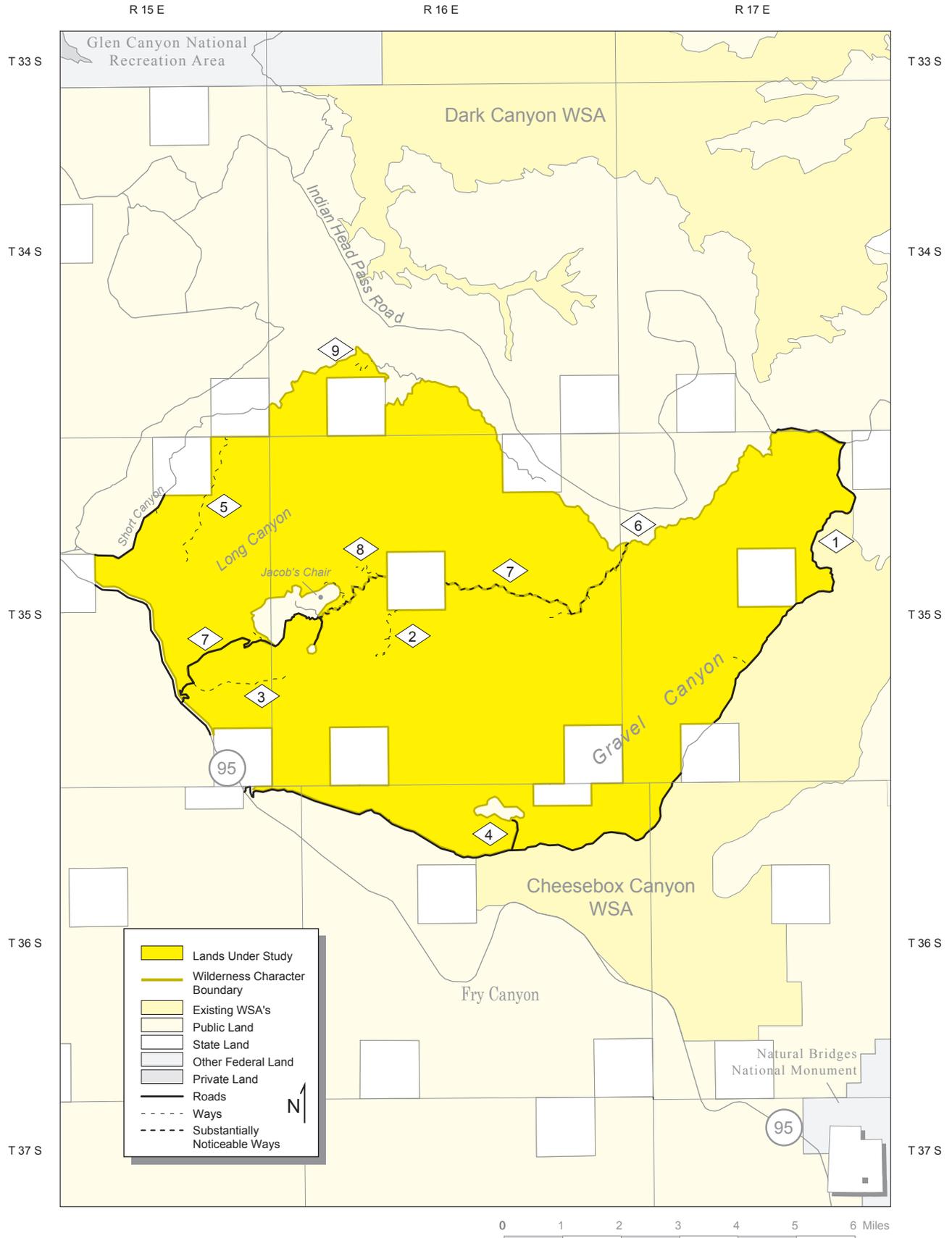




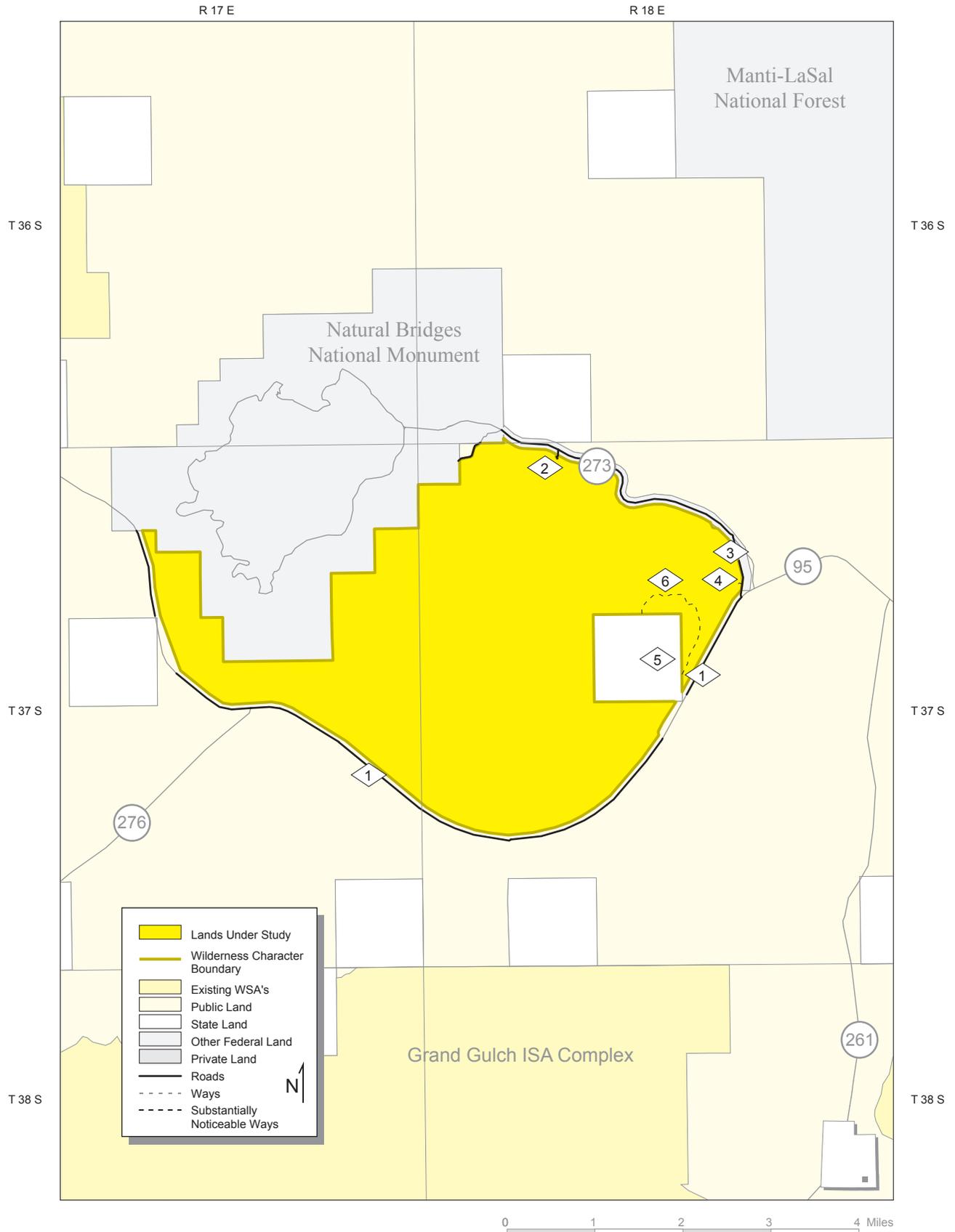
MAP 3.9



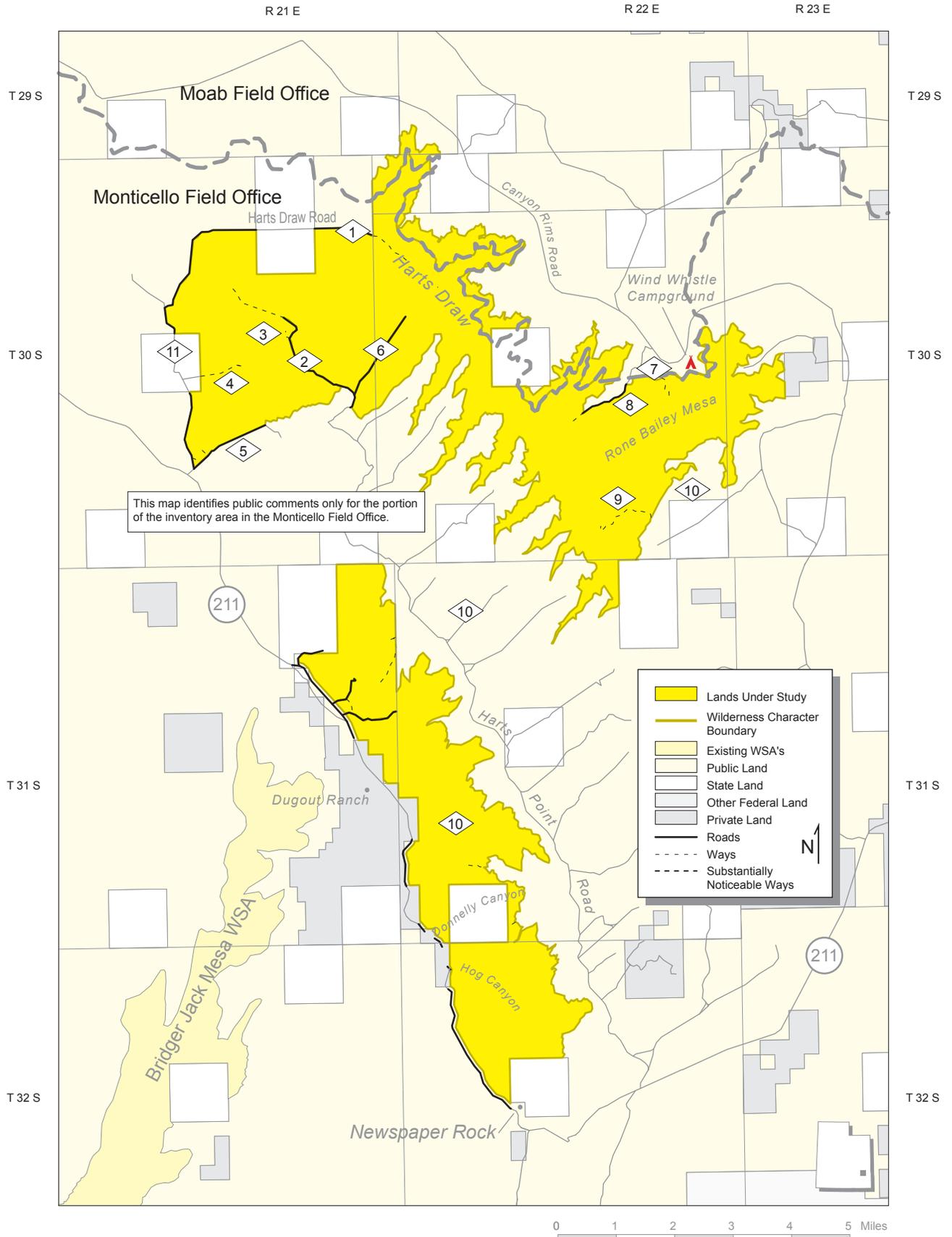
MAP 3.10



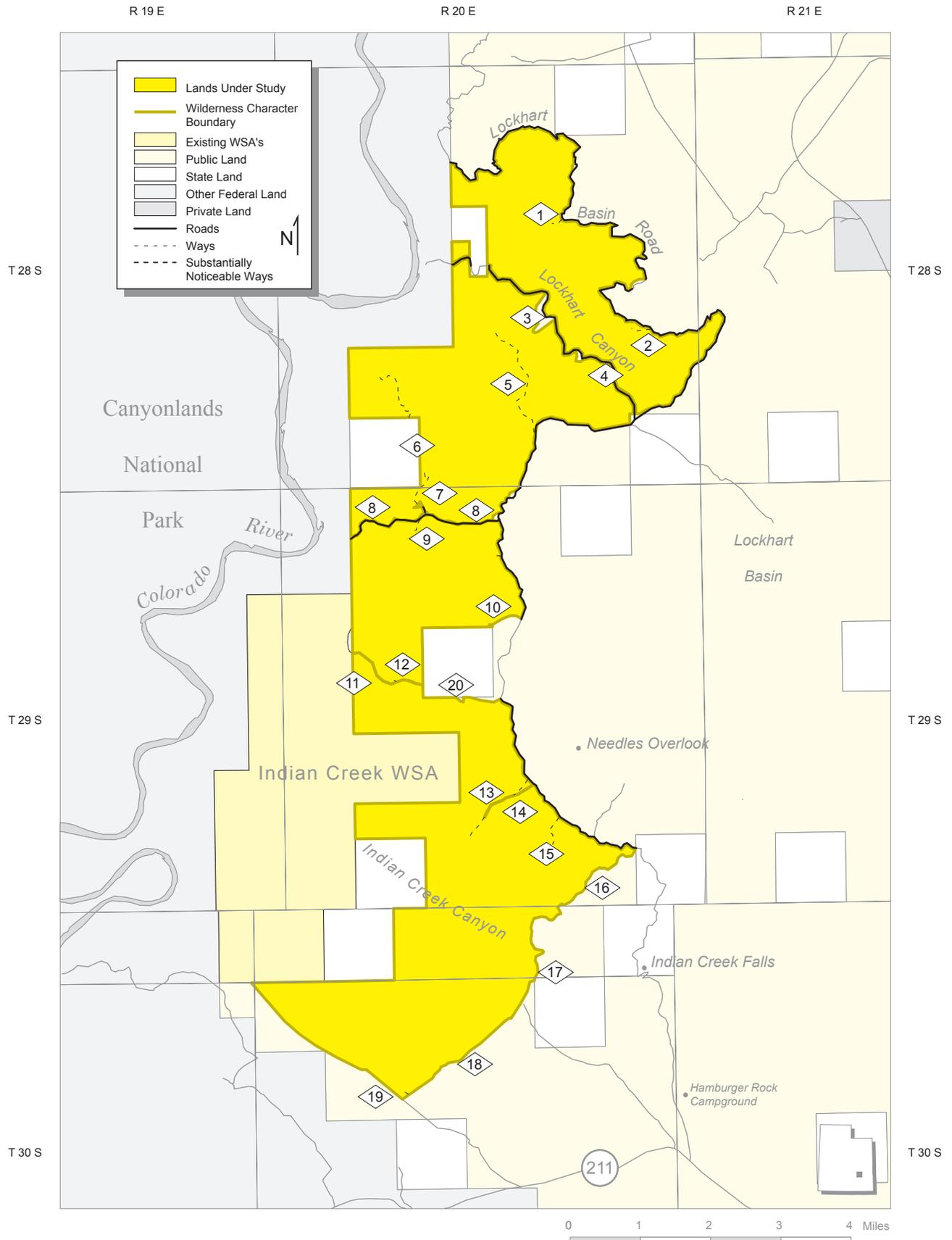
MAP 3.12



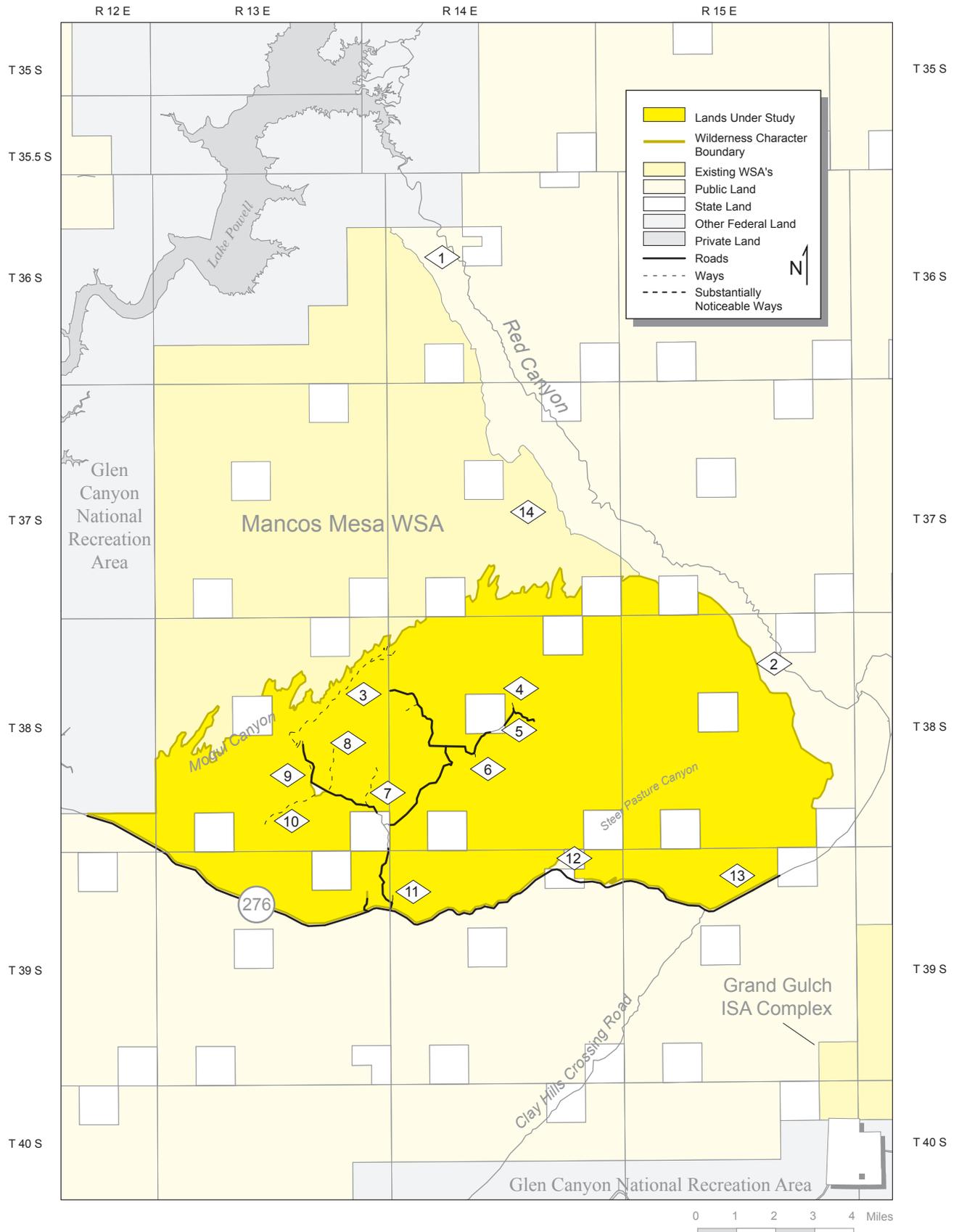
MAP 3.13



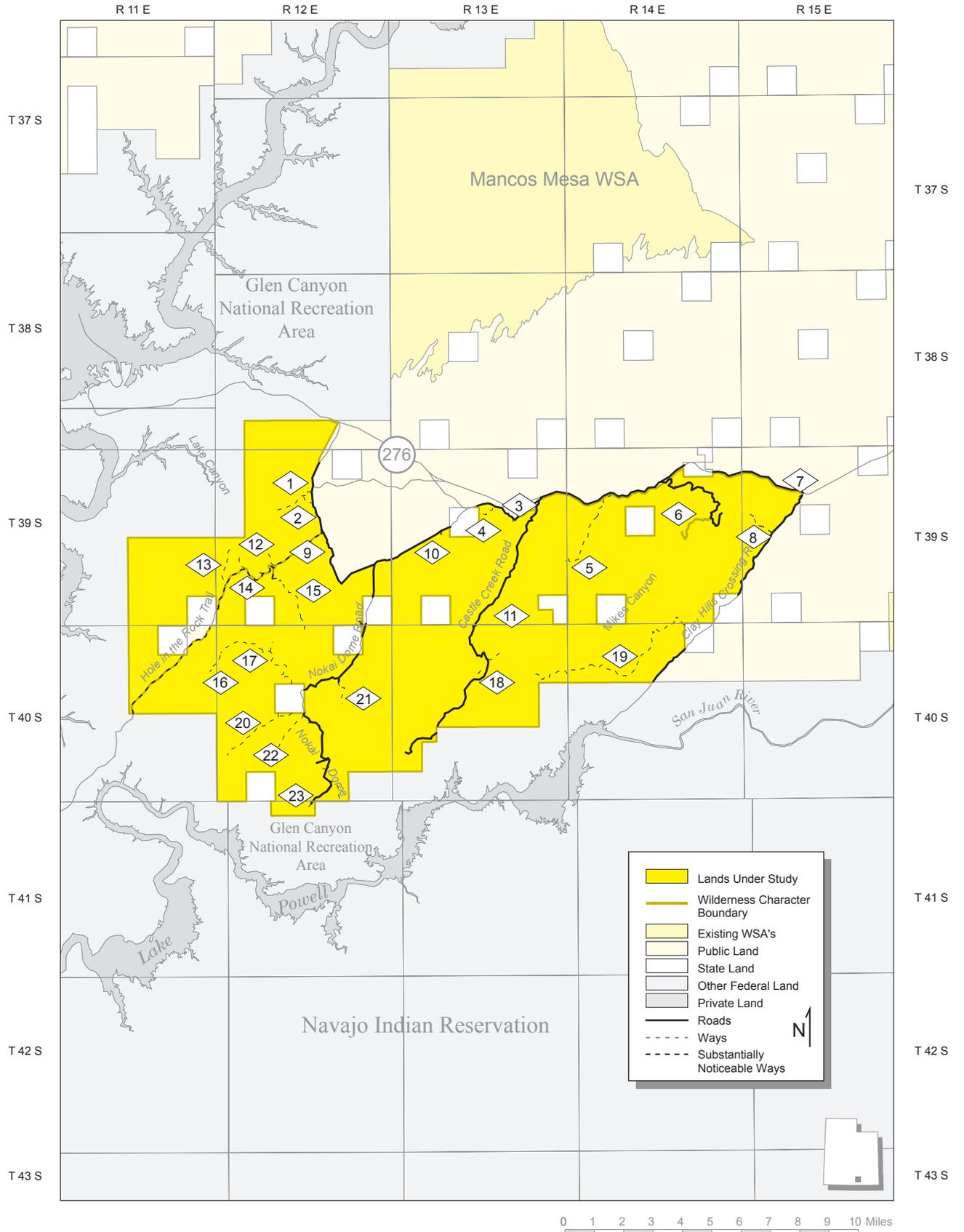
MAP 3.14



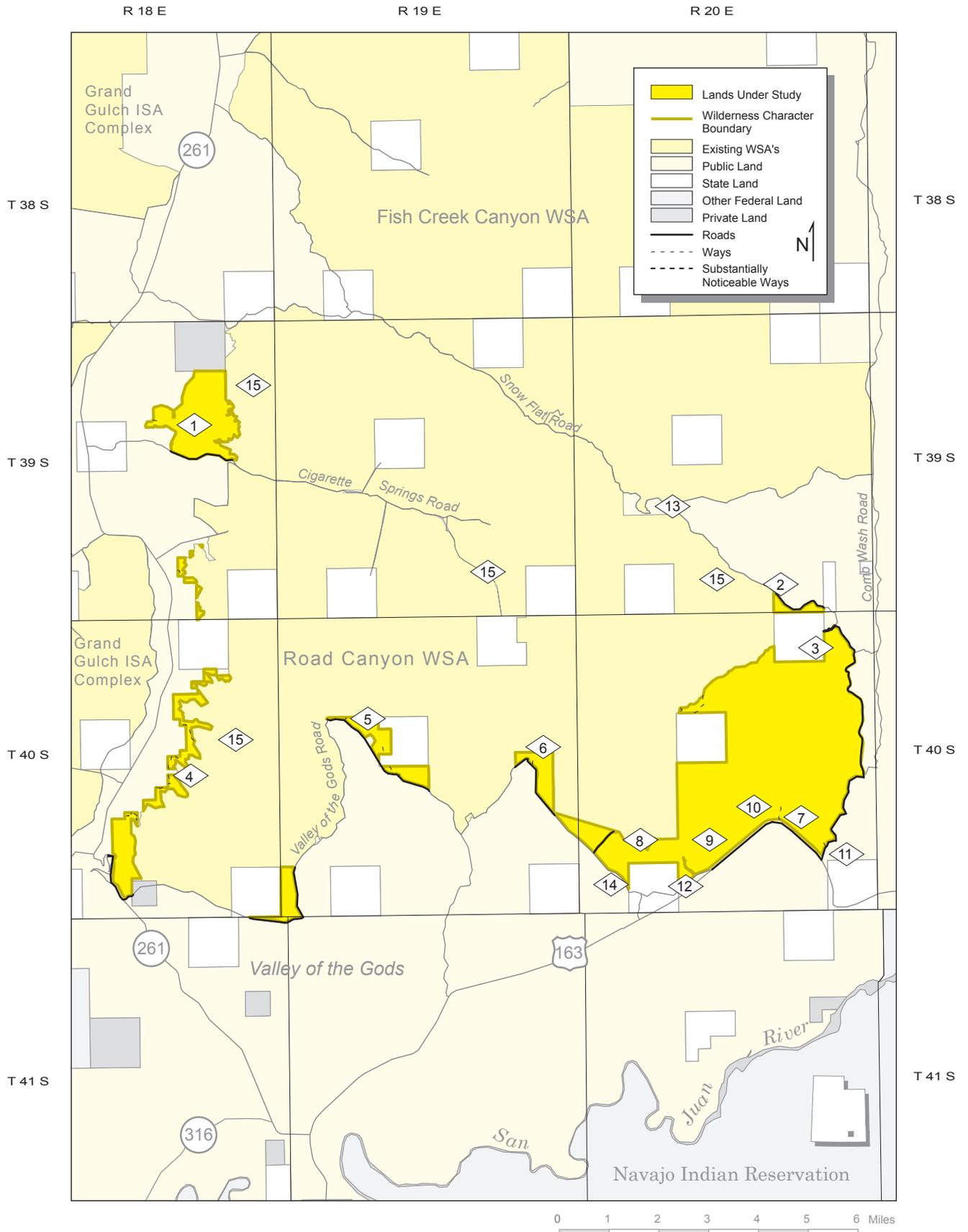
MAP 3.15



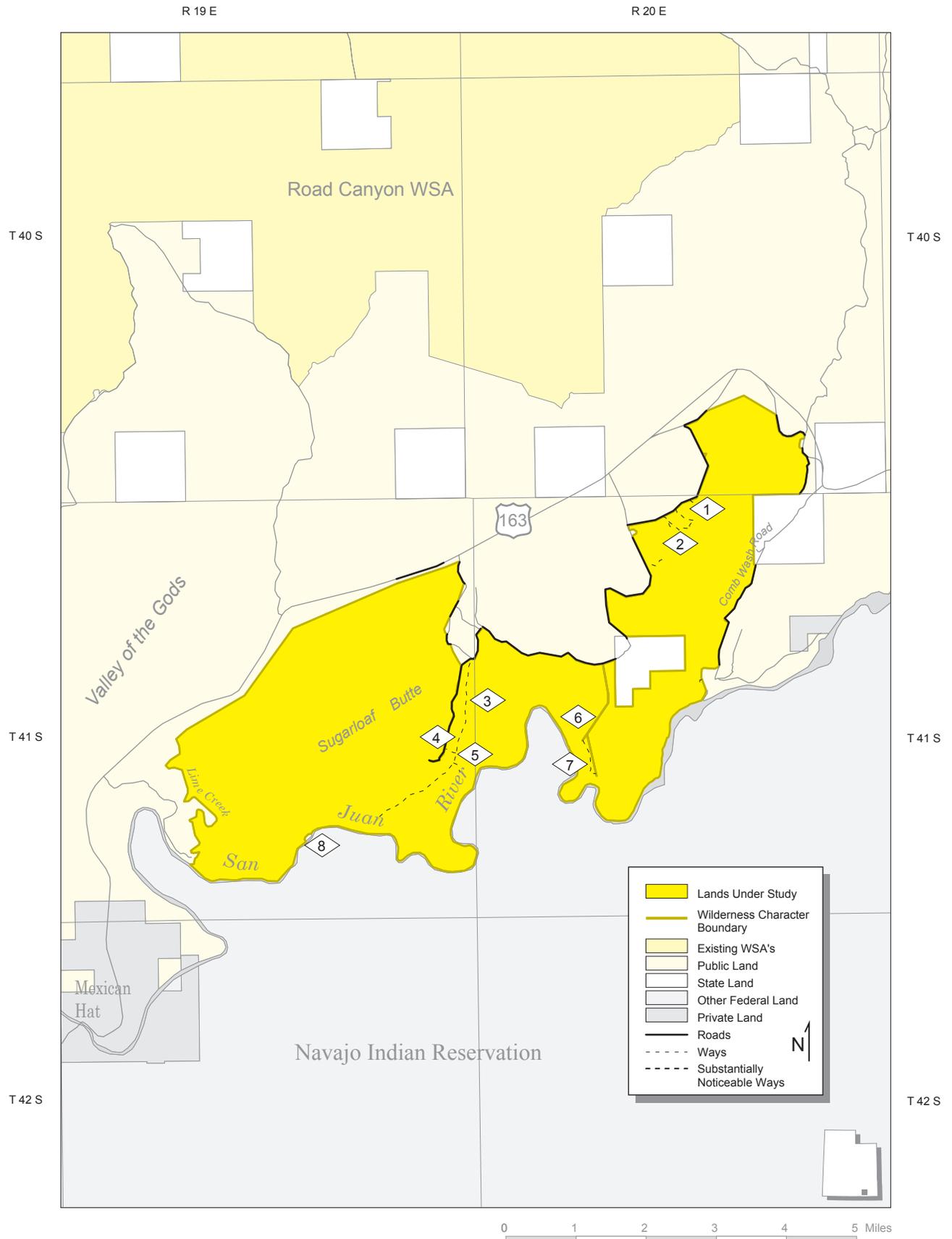
MAP 3.16



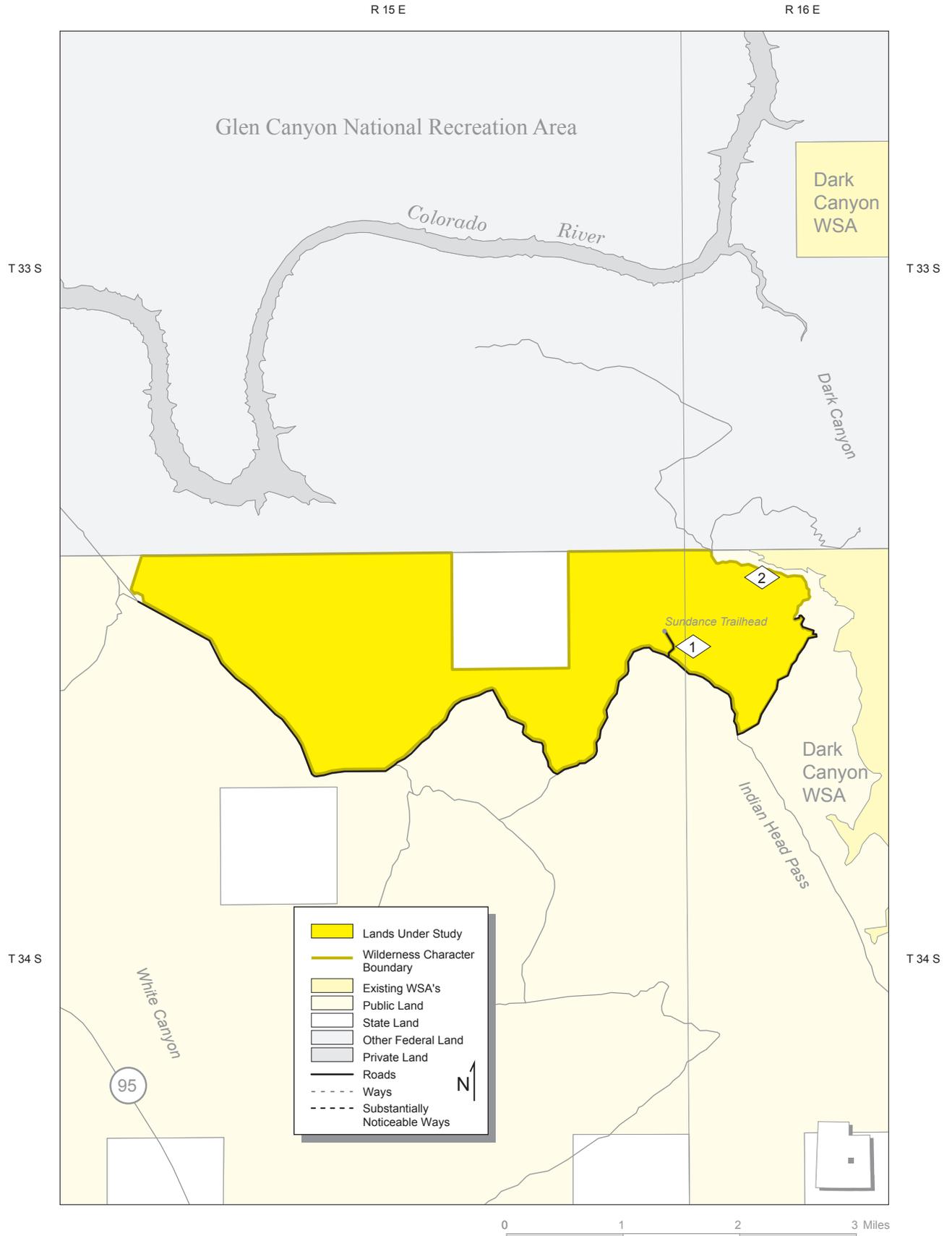
MAP 3.17



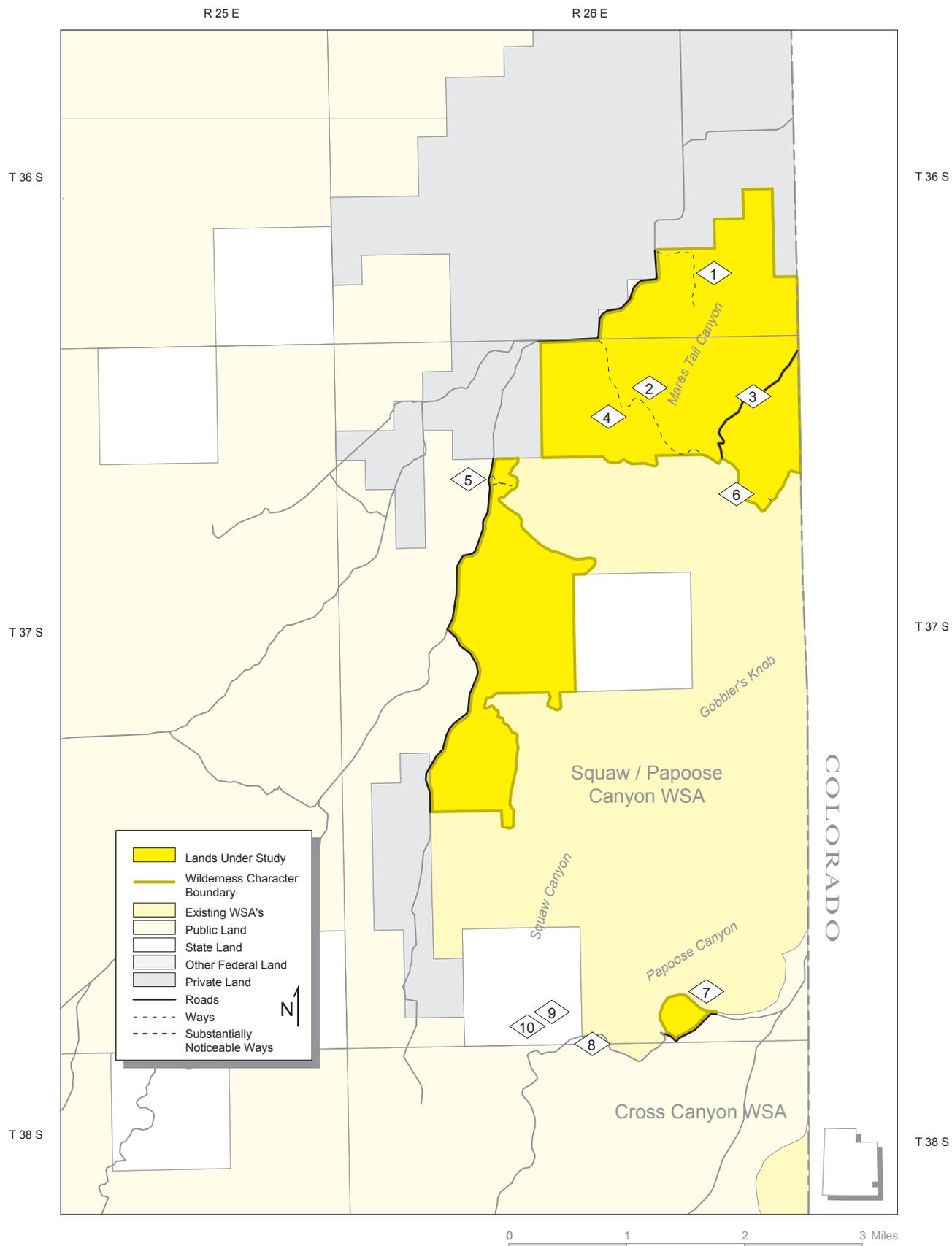
MAP 3.18



MAP 3.19



Squaw and Papoose Canyon Response to Comments



MAP 3.21

Glossary of Terms:

Terms used in this document are defined as follows:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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