

BLM-UTAH ADDITIONAL GUIDANCE FOR MANUAL 6310 – CONDUCTING WILDERNESS INVENTORY ON BLM LANDS

Frequency of updates to a wilderness characteristics inventory

The [Federal Land Policy and Management Act](#) (FLPMA) Section 201 requires BLM to maintain on a continuing basis an inventory of all public lands and their resources and other values.

[Manual 6310](#) Section .06 clearly directs BLM to consider updating a wilderness characteristics inventory under certain circumstances, including:

- Acquisition of lands that either independently or in concert with contiguous lands meet the size criteria or an exception described in the inventory process;
- A land use planning process (*note: the scope of certain targeted land use plan amendments may except making allocation decisions regarding lands with wilderness characteristics resource but must still assess impacts*);
- Development of [NEPA analysis](#) for a project that may impact wilderness characteristics;
- External scoping or internal review identifies the wilderness characteristics resource as a potential issue during the NEPA process;
- Receipt of new information concerning the wilderness characteristics resource from the public and the submission meets the BLM's minimum standard ([Manual 6310](#) Section .06.B.); and
- Any other appropriate opportunity to maintain an inventory of the wilderness characteristics resource per [FLPMA](#) Section 201.

Key components to consider when assessing the accuracy of previous wilderness characteristics inventories

BLM must maintain and update as necessary an inventory of wilderness resources on public lands. It is not uncommon for conditions relating to wilderness characteristics to change over time. Authorized projects in lands with wilderness characteristics units may have had impacts to the inventoried resource, resulting in a reduction or elimination of the resource. Conversely, an area that was once determined to lack wilderness characteristics may now possess them due to natural or intentional reclamation activities. BLM-Utah must ensure early in the NEPA process that a wilderness characteristics inventory of potentially affected lands (i.e., parcels that may meet the size criteria or exceptions and the naturalness criteria) is completed and documented in accordance with [WO IM 2011-154](#) and [Manual 6310](#).

If a project or planning area includes lands without any prior inventory for the presence or absence of wilderness characteristics on record, the BLM will consider whether the potential for wilderness characteristics exists within the area. Generally, this will require review of the most recent inventory on record to determine if there is reasonable probability that conditions have changed.

Any citizens' proposals submitted within the project or planning area must be addressed in the administrative record. In the absence of a citizens' proposal, the BLM must still consider scenarios that may initiate an update to historic inventory findings or amend historic unit boundaries, including, but not limited to:

- BLM specialists identify the probability or potential for the presence of wilderness characteristics within the planning or project area
- Development has occurred within a previously identified lands with wilderness characteristics unit that affects the unit's size and/or apparent naturalness
- The condition of a road used to define the boundary of a previously inventoried unit or sub-unit has deteriorated to the extent that it no longer meets the wilderness inventory road definition
- A chaining used to define the boundaries of a previously inventoried unit or sub-unit has naturally reclaimed and no longer impacts apparent naturalness
- A fenceline used to define the boundary of a previously inventoried unit or sub-unit is not substantially noticeable
- Recreational use patterns have substantially changed and prior determinations regarding outstanding opportunities for solitude and/or primitive and unconfined recreation require analysis

How does a field office consider and respond to new information from the public?

Initial Response to Submissions

Members of the public may collect and submit inventory information to the BLM for consideration. While the public may not (1) be part of BLM wilderness characteristics inventory teams; (2) conduct an inventory on behalf of the BLM; or (3) make determinations for the BLM about the presence or absence of wilderness characteristics (see [WO IM 2013-106](#)), public information is valuable to the BLM's inventory process.

Field offices must consider new wilderness characteristics inventory information from the public that meets the minimum national standards established in [Manual 6310](#), Section .06.B and evaluate new wilderness characteristics inventory information in accordance with the requirements set forth in BLM Manual 6310 and this IM.

BLM-Utah strives to maintain positive working relationships with the public. In the interest of professionalism, as soon as practicable, and usually within 30 days after receiving new inventory information, the authorized officer will respond in writing to the submitting stakeholder to acknowledge receipt and to explicitly document the following aspects of the new information:

- Whether the new information meets the standards set forth in [Manual 6310](#) Section .06.B (*Note: If the submission does not meet the standards, include a description of what additional information is required to meet the minimum standards*); and
- The estimated timeframe for the field office's evaluation of new information. This timeframe should appropriately relate to any proposed projects and NEPA analysis within or near the inventory unit. For example, if the public submits information about the presence or absence of wilderness characteristics during the scoping period for a project, then the authorized officer should indicate that the review and potential update to the wilderness characteristics inventory will be completed during the NEPA analysis and made available prior to the decision.

BLM-Utah field offices will include all written correspondence and telephone conversation records regarding new wilderness characteristics inventory information in each applicable inventory unit's Permanent Documentation File in accordance with [Manual 6310](#), Appendix A.5.

The authorized officer is encouraged to provide submitting parties with timely written updates on substantive subsequent changes to the original estimate of the amount of time needed to evaluate the new information. The preferred mode of transmitting new information is through timely updates of the BLM website. Additionally, [WO IM 2013-106](#) instructs BLM to provide access to all relevant publicly available information to interested parties in a timely manner.

Updating the Inventory

Keep all relevant official records related to a lands with wilderness characteristics inventory in a Permanent Documentation File. Each file must include sufficient detail to ensure that BLM determinations regarding wilderness inventory roads, determination of unit boundaries, and the presence or absence of wilderness characteristics are consistent with agency guidance. This often requires that BLM write detailed narratives regarding inventory determinations in Form 2 that directly correspond to and reference the route analysis, maps and GIS data, relevant publications, photos, and any other supporting documentation.

Occasionally, an update to the inventory may only require a review within the office to determine if conditions have changed depending on the quality of previous inventory information, existing spatial data, and recent photographs or field notes. However, where geo-referenced on-the-ground photos provided by the public reveal inconsistencies with previous BLM findings, a field visit is likely the most appropriate course of action to clearly document current conditions. Field data collection provides the BLM and the public with a clear record detailing BLM's determinations on wilderness characteristics.

Inventory teams may not introduce any criteria or include information in the inventory forms that is not outlined explicitly in Manual 6310. If other information is collected during the inventory (e.g., a unit's ecological integrity), it may be documented in field notes but is not included in the rationale for determination of the presence or absence of wilderness characteristics. Additionally, the inventory must not include any information related to the manageability of the unit for protection of wilderness characteristics (e.g., how much of the unit is leased for mineral development). Only existing developments may be documented.

Inventory Units Involving Multiple Field Offices

When inventory units include BLM-administered lands that are managed by multiple field office jurisdictions, including crossover into adjoining states, specialists should work collaboratively and use the most accurate and current data available. The original case file and supporting data is generally maintained by the lead office (usually determined as the office that administers the most acreage within the unit). Copies of data and forms should be on file at the collaborating office. The forms should be reviewed and signed by a Field or District Manager representing both field offices, even if the Permanent Documentation File is maintained by a single office.

Boundary Delineation

Determination of a unit's boundaries begins with a review of [historical documents](#), including the original wilderness characteristics inventory and any updates (e.g., [1999 Utah Wilderness Inventory](#), updates for 2008 RMPs, etc.). Refer to [Manual 6310](#) Section .06.C.1 for guidance on inventory unit boundary delineation.

Inventory teams generally adopt historic unit boundaries or consider citizens' proposed boundaries as a starting point for delineating the area to be inventoried. Constructed and maintained roads (Class B roads and Class D roads with documented maintenance) and land tenure generally form initial unit boundaries.

The unit boundaries are usually adjusted after field data collection based on an assessment of impacts to naturalness. Wilderness inventory roads must be excluded from the final inventory unit. Observations in the field may identify a need to exclude other substantially noticeable human-caused impacts to naturalness from the final inventory unit.

BLM's jurisdiction regarding the wilderness characteristics resource is limited to BLM-administered surface. Adjacent private lands or lands managed by the State of Utah or other agencies are not included in the inventory unit boundaries. However, units that are adjacent to designated wilderness or similar areas managed by other federal agencies may meet an exception to the size criteria (see [Manual 6310](#) Section .06.C.2.a for additional information). A unit may also encompass inholdings that are owned or managed by other entities, but the inholdings are excluded from the unit boundaries and the inventory unit acreage must only reflect surface lands administered by the BLM. Outside impacts, including disturbances on adjacent lands, are not normally cited as impacts to naturalness unless a major outside impact has a direct effect on the apparent naturalness of the unit. The analysis should clearly describe the extent of the impact of human modifications to apparent naturalness for the average visitor based on the unit's size, configuration and topographic screening.

Select the most logical and defensible boundary to delineate a unit. Do not use features (e.g., substantially unnoticeable features) that do not comply with Manual 6310. Additionally, although such features may not constitute an appropriate unit boundary, they may still be evaluated as an impact under the naturalness criteria.

Apparent Naturalness

Route analysis forms ([Manual 6310](#) – Appendix C) should be completed for every road used as a unit or sub-unit boundary or that is cherry-stemmed into a wilderness characteristics unit, unless the road so clearly meets the criteria (i.e., a paved highway or crowned and ditched road) that further documentation is unnecessary. If the status of a route is contested (i.e., questions exist regarding mechanical construction or maintenance or use), then a route evaluation form should be completed. Human impacts that are cited as substantially noticeable should be mapped and photographed. Field data should be georeferenced, dated, and include the direction the camera is facing so that the information collected is contextual and repeatable. All photo point locations should be provided on the map of the unit (see [Manual 6310](#) Appendix A.5). Georeferenced aerial photos that were used to make determinations should also be cited as part of the administrative record. Inventory teams should take photographs from representative locations and include landscape level views where possible. The corresponding narrative should include sufficient information to allow readers to assess the impacts to apparent naturalness or outstanding opportunities for solitude or primitive and unconfined recreation and the extent of the impacts in relation to the size of the unit. Ensure that the analysis of naturalness adopts the terminology from [Manual 6310](#) and does not include any extraneous criteria.

Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation

Manual 6310 employs the following definitions:

- Outstanding: 1. Standing out among others of its kind; conspicuous; prominent; 2. Superior to others of its kind [other BLM-administered lands in the broad geographical area]; distinguished; excellent.
- Opportunity: A situation or condition favorable for attainment of a goal.
- Solitude: The state of being alone or remote from others; isolation. A lonely or secluded place.
- Primitive and Unconfined Recreation: Non-motorized, non-mechanized (except as provided by law [for accessibility]), and undeveloped types of recreational activities.

Solitude can be considered the ability of a visitor to avoid the sights, sounds, and evidence of other people while **inside the unit**. The only time BLM considers impacts of sights and sounds from **outside** the inventory area is if these impacts are pervasive and omnipresent (i.e., inescapable throughout the unit). The outstanding opportunities criterion has been interpreted broadly across the agency and inventory teams should take care to avoid improperly eliminating units due to outside impacts (e.g., a large unit that is adjacent to a highway). Citing outside impacts is intended only for exceptional circumstances and requires clear documentation that the impacts are pervasive throughout the entire unit (e.g., a small unit immediately adjacent to a rock-crushing plant that operates around the clock). The subject matter expert should consider that Congress, for example, has designated wilderness areas that adjoin interstate highways and urban centers, where these outside impacts are considered neither pervasive nor omnipresent.

Documentation of the rationale for determining the presence or absence of outstanding opportunities is not solely based on topography or vegetative screening, though these features should normally be addressed in the analysis. The shape of the inventory unit may also play a role in determining whether outstanding opportunities exist for solitude or primitive and unconfined recreation. Ensure that the analysis of outstanding opportunities adopts the terminology from [Manual 6310](#) and does not include any extraneous criteria.

Outstanding opportunities for primitive and unconfined recreation include those uses that would be appropriate in a wilderness setting (hiking, hunting, equestrian use) and not mechanical or motorized uses (mountain biking, car camping). The presence of motorized/mechanical use should be documented to the extent that it impacts primitive and unconfined recreation and solitude. If this mechanical-motorized use is a component of the rationale for finding the area does not have outstanding opportunities, clearly document its spatial and temporal extent (e. g. heavy ATV use during a two-week per year hunting season with almost no use the rest of the year is not normally a rationale for excluding an area based on motorized use.)

Supplemental Values

While the presence of supplemental values is not required for a unit to contain wilderness characteristics, BLM should document the full suite of resource values known to exist within the unit. This does not mean that the inventory team must conduct extensive research into supplemental values. Simply document the resources that are already on record or reasonably determined. The permanent documentation file should also include information on any

previously identified supplemental values, such as ecological, geological, or other features of scientific, educational, scenic, or historical value.

State Office Review and Updating the Statewide Geodatabase:

In order to maintain consistency across the state and to ensure compliance with [Manual 6310](#), the Utah State Office National Conservation Lands Program Lead will be notified when a field office completes an update prior to making the findings publicly available. The Utah State Office will respond, usually within two weeks, with comments notifying the field office whether or not the inventory meets [Manual 6310](#) standards. The Utah State Office review is intended to ensure consistency and completeness of BLM-Utah inventories, and comments are returned to a manager on an advisory basis. The authorized officer retains the authority for documenting and deciding whether or not the unit, or portions of the unit, possess or lack wilderness characteristics.

In order to accurately respond to public requests for information and data calls, field offices are required to update the statewide GIS geodatabase for lands with wilderness characteristics and provide the UTSO with a signed copy of Form 1, Form 2 and the Summary of Analysis whenever an inventory is updated. Coordinate these efforts with local and state office GIS staff and the National Conservation Lands Program Lead as needed to ensure consistency with [NLCS data standards](#).

Washington Office Instruction Memo 2013-106: Sharing of Wilderness Characteristics Inventory Information with the Public

BLM requires direct sharing of inventory results with citizen groups that have provided inventory information for agency consideration ([WO-IM-2013-106](#)). Such information may qualify as “significant new information” under NEPA relative to resources potentially affected by ongoing or proposed actions, and the BLM considers and responds to these submissions.

Below is an example of a response to information submitted by the public for use in an individual letter or in a related NEPA document:

In *(mo/yr)*, BLM reviewed the information and photos that *(name/organization)* submitted for the *(unit name/number)* on *(mo/yr)*, and determined that this information *(does/does not)* indicate a significant change in actions, circumstances or information relative to the conditions present when BLM conducted the original wilderness inventory or when the agency updated the wilderness inventory for this unit in *(year)*.

For information that does not indicate a change in conditions or findings, the example response could continue:

BLM specialists have verified that no changes are present that affect the size, naturalness, outstanding opportunities for solitude or primitive and unconfined recreation or supplemental values. As such, the submitted information represents a disagreement with BLM’s findings rather than new information warranting re-evaluation of our inventory analysis and conclusions.

Preliminary inventory findings may be subject to release under the [Freedom of Information Act](#) (FOIA). BLM-Utah field offices should make updated and approved wilderness characteristics

inventory findings (using the forms provided in BLM [Manual 6310](#), Appendix B) available to the public as soon as practicable after their completion and before the inventory data is used to inform decisions. BLM offices should make the findings publicly available by posting updated inventory forms on BLM websites, resulting in improved transparency and a possible decrease in FOIA requests from the public concerning BLM's final wilderness characteristics inventory findings.

As with any public document, the BLM must protect certain types of information consistent with applicable law, including Privacy Act information and sensitive cultural resources information, prior to the release of inventory findings. BLM field offices should consult with their respective FOIA, Privacy Act, and cultural resources specialists, as well as with their local/regional Solicitor's Office if they are concerned about information or data contained in these final inventory findings, as portions of these files may need to be redacted prior to their release.

WO IM 2013-106: The Role of Cooperating Agencies (CAs) in the Wilderness Characteristics Inventory and Land Use Planning Process

The BLM is responsible for compiling and maintaining the wilderness characteristics inventory, making findings regarding the presence or absence of wilderness characteristics, and incorporating the results of the inventory into the NEPA and/or land use planning processes. CAs for the project for which the inventory is being updated may collaborate and coordinate with the BLM in the inventory process (including data collection and analysis), the development of planning criteria, the formulation of alternatives, the estimation of effects of alternatives, and the selection of a preferred alternative under a Memorandum of Understanding (MOU). However, as with any member of the public, the opportunity to provide data and information does not mean that CAs may make decisions on how to manage public lands found to have wilderness characteristics. Any information provided to the BLM by CAs is given the same level of consideration as a submittal from any member of the public.

The BLM, as the agency that manages these lands, is ultimately responsible for making the final decisions in accordance with all legal requirements, and ensuring that the public interest is safeguarded. However, the BLM may, as appropriate, conduct field trips or educational sessions to explain the general inventory process to CAs or the public.

Additional Resources

Determinations on the presence or absence of wilderness characteristics is made by a BLM inventory team and signed by the authorized officer. Team members must be informed in the application of [Manual 6310](#).

While there are currently no courses for lands with wilderness characteristics offered through DOI Learn, additional training is available through the Arthur Carhart National Wilderness Training Center - [Agency Resources for BLM](#) and through BLM's National Training Center [Knowledge Resource Center](#). The Washington Office's National Conservation Lands Division periodically offers a webinar on lands with wilderness characteristics. The Utah State Office's Branch of Outdoor and Heritage Resources will schedule specific training modules on request.