



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

MANUAL TRANSMITTAL SHEET

Release  
6-122

Date  
1/10/2001

Subject

H-6310 - 1 - WILDERNESS INVENTORY AND STUDY PROCEDURES

1. Explanation of Material Transmitted: This transmit H-6310 -1 - WILDERNESS INVENTORY AND STUDY PROCEDURES, which is a handbook that provides the specific policy, general procedures, and guidance for wilderness inventories under the provisions of Section 201 of the Federal Land Policy and Management Act of 1976, (FLPMA) and the designation of Wilderness Study Areas under the provisions of Section 202 of the FLPMA.
2. Reports Required: None
3. Material Superseded: None
4. Filing Instructions:

INSERT:

H-6310-1

(Total: 26 sheets)

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**WILDERNESS INVENTORY AND  
STUDY PROCEDURES**

**H-6310-1**

**U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT**

**H-6310-1-WILDERNESS INVENTORY AND STUDY PROCEDURES**

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## H-6310-1-WILDERNESS INVENTORY AND STUDY PROCEDURES

**.01 Purpose.** This Handbook contains the Bureau of Land Management's (BLM) policy, direction, general procedures, and guidance for wilderness inventories under provisions of Sections 201 of the Federal Land Policy and Management Act of 1976 (FLPMA) and the designation of wilderness study areas (WSAs) under provisions of Sections 202 of the FLPMA.

**.02 Objective.** The objective of this guidance is to establish BLM policy on wilderness inventory procedures, and provide guidance to be used in the land use planning process to determine if inventoried lands should be designated as WSAs managed under the provisions of the Interim Management Policy for Lands Under Wilderness Review (IMP).

**.03 Authority.** Principal authorities affecting the study of public lands for wilderness values are:

- A. The Federal Land Policy and Management Act of 1976, 43 USC 1701, et seq.
- B. The Wilderness Act of 1964, 16 USC 1131.
- C. National Environmental Policy Act of 1969, (NEPA), 42 U.S.C. 4321.
- D. Council on Environmental Quality (CEQ) regulations at 40 CFR 1500-1508.

**.04 Responsibility.**

- A. Director, Bureau of Land Management, shall:
  - 1. Establish policy, goals, objectives, and procedures for wilderness inventory and planning on public lands.
  - 2. Establish policy, goals, objectives, and procedures for the management of public lands with wilderness character.
  - 3. Coordinate with BLM State Directors, field offices, other agencies, or entities in conducting wilderness inventory and planning.

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4. Ensure adherence to proper delegations of authority related to decisions, actions, and policies concerning inventory, planning, and interim management protection.

5. Coordinate the development of procedures and guidance for making wilderness considerations as a part of management plan development and other planning processes.

6. Ensure compliance with the NEPA and the CEQ regulations. Serve as liaison with the Department's Office of Environmental Assessment.

B. State Directors, within their respective jurisdictions, shall:

1. Implement policy and provide statewide program coordination and guidance for wilderness inventory and study.

2. Review the field manager's inventory findings and through the use of the land use planning process as regulated at 43 CFR 1600, determine whether an inventory area should be designated as a WSA under the land use planning provisions of Section 202 of the FLPMA.

3. Provide program development, technical management assistance, and funding support to field offices as required to ensure wilderness is adequately considered in planning efforts.

4. Ensure compliance with the NEPA and the CEQ regulations.

C. Field Managers, within their respective jurisdictions, shall:

1. Gather and evaluate public input, as appropriate, for the wilderness inventory.

2. Identify and inventory areas, and determine which inventory areas or portions of inventory areas possess or lack wilderness characteristics.

3. Maintain a detailed file for each inventory area.

4. After consulting with the State Director, determine wilderness study priorities and publicly announce wilderness planning through formal publication of a Notice of Intent for the associated land use planning/NEPA process as required at 43 CFR 1610.2(c).

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5. Assure public involvement in the wilderness study process.
6. Consider wilderness through the appropriate planning process and follow applicable BLM guidance for planning and NEPA compliance.
7. Evaluate proposed actions to determine their potential impact on known or potential wilderness values prior to making a decision on the proposal.
8. Recommend to the State Director those public lands that meet the criteria for identification as WSAs.
9. Protect areas designated as Section 202 WSAs under the provisions of H-8550-1, Interim Management Policy for Lands Under Wilderness Review.

### **.05 References.**

- A. The Federal Land Policy and Management Act of October 21, 43 USC 1701, et seq.
- B. The Wilderness Act of September 3, 1964, 16 USC 1131.
- C. National Environmental Policy Act of 1969, 42 U.S.C. 4321.
- D. Council on Environmental Quality regulations, 40 C.F.R. 1500-1508.
- E. Regulations, 43 CFR Part 8560, Management of Designated Wilderness Areas.
- F. Regulations, 43 CFR Subpart 1601, Planning, and Subpart 1610, Resource Management Planning.
- G. Regulations, 43 CFR Subpart 3802, Exploration and Mining, Wilderness Review Program.
- H. BLM Handbook, H-8550-1, Interim Management Policy and Guidelines for Lands under Wilderness Review.
- I. BLM Handbook H-1600-1, Land Use Planning Handbook

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**.06 Policy.** Wilderness is a resource which fits within the framework of multiple-use on the public lands. In addition to its value as a setting for primitive recreation or solitude, wilderness can provide a range of benefits to other multiple resource values and uses which are of significance to the American people.

A. The policy of the Bureau of Land Management for the wilderness inventory and study of public lands is as follows:

1. Wilderness Inventory. The BLM will prepare and maintain on a continuing basis an inventory of certain public lands to determine the presence or absence of wilderness characteristics.
2. Identifying Inventory Areas. The BLM will identify those public lands to be inventoried and notify the public of its intent to initiate an inventory to determine the presence or absence of wilderness characteristics.
3. Identifying WSAs. The BLM will use the land use planning process to determine which inventory areas are to be managed as WSAs.

B. Inventory of Acquired Lands. All lands acquired through exchange shall undergo a wilderness inventory. Wilderness values should initially be considered and evaluated as part of the environmental analysis prepared to process the exchange. For acquired lands that do not meet the size criteria, the inventory requirement would be satisfied by documenting the size analysis in the environmental analysis prepared for the acquisition. A wilderness inventory should be completed within 90 days or as soon as practicable after the acquisition. After 90 days, parcels acquired through exchange are subject to mineral entry and to public land laws. Potential impacts, from mineral entry or from the authorization of public land laws, could affect the eligibility of an area to be designated as a WSA. For these reasons, the inventory needs to be promptly addressed to allow time to implement protective measures if needed.

Lands acquired other than by exchange, and not specifically acquired for wilderness purposes, could subsequently be inventoried to determine if they contain wilderness characteristics.

C. Inventory Requirements for Acquired WSA and Wilderness Inholdings. Inholdings acquired within WSAs or wilderness areas should be inventoried only if the land use planning document that designated the WSA or the statute establishing the wilderness area does not automatically designate acquired inholdings as part of the WSA or wilderness area.

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D. Other Public Lands That May Require a Wilderness Inventory. This includes lands identified as possibly having wilderness character by BLM, lands included in proposed legislation, or lands within externally generated proposals that document new or supplemental information regarding resource uses and condition of the lands not addressed in current land use plans and/or prior wilderness inventories.

E. Evaluation of New Information Suggesting That an Area of Public Lands Has Wilderness Characteristics. The FLPMA and the BLM planning manual require that the BLM provide opportunity for public participation in federal public land use decisionmaking conducted under FLPMA. BLM may, from time to time, receive requests from the public suggesting that existing land use plans do not adequately identify public lands that have wilderness characteristics. Further, BLM may itself generate new information suggesting that existing plans may not adequately identify public lands with wilderness characteristics.

In order for such requests from the public to be considered, they should be accompanied by (a) a map which identifies specific boundaries of the area in question; (b) a detailed narrative that describes the wilderness characteristics of the area and documents how that information significantly differs from the information in prior inventories conducted by BLM regarding the wilderness values of the area; and photographic documentation.

Managers should review any such information and documentation submitted as soon as practicable, and shall field check the information as appropriate. After such review and field checking, the BLM should make a preliminary determination whether the conclusion reached in previous BLM inventories that the area in question lacked wilderness characteristics remains valid, or whether instead there is a reasonable probability that the area in question (or a significant portion thereof) may have wilderness characteristics.

If BLM determines that the conclusion reached in previous BLM inventories remains valid, it should notify the person(s) submitting that information of that fact, but should retain the information and documentation and evidence of BLM's consideration.

If the BLM determines that the area in question (or a significant portion thereof) may have wilderness characteristics, and if actions are proposed that could degrade the wilderness values or the roadless character so as to disqualify the area from further consideration as a WSA, as discussed in paragraph .06F, below, the BLM should, as soon as practicable, initiate a new land use plan or plan amendment to address the wilderness values.

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### F. Evaluation of Actions Proposed in Areas that May Have Wilderness Characteristics.

When an action is proposed in an area that BLM determines may have wilderness characteristics, BLM should follow the process outlined below:

The BLM manager should first determine if the proposed action is consistent with the land use plan in effect for that area. If it is not, then consideration cannot proceed without a new land use plan or plan amendment.

If it is consistent with the land use plan, the BLM manager should prepare a NEPA document for the proposed action. That NEPA document should consider available new information on wilderness characteristics as discussed in .06E.

If the BLM determines that impacts from a proposed action could degrade the wilderness values or the roadless character so as to disqualify the area from further consideration as a WSA, the BLM must consider in the NEPA document an alternative of mitigating or relocating the proposed action to avoid or minimize impacts on wilderness values; and must also consider the alternative of postponing a decision on the proposed action until the wilderness values can be addressed through a new land use plan or plan amendment.

Where the NEPA analysis shows that a proposed action would not disqualify the area from further consideration as a WSA, BLM may approve the action, if consistent with other applicable requirements of law and other resource management considerations.

Where the NEPA analysis shows that a proposed action would disqualify the area from further consideration as a WSA, BLM should, subject to valid existing rights, postpone the action until wilderness values can be addressed through a new land use plan or plan amendment, which process should be expedited and completed as soon as possible.

G. WSA Management. Public lands designated as a WSA through a land use plan shall be managed under the Interim Management Policy for Lands Under Wilderness Review (IMP), Handbook H8550-1, so as not to impair their suitability for wilderness designation. All WSAs will remain under the IMP until wilderness legislation is enacted by the Congress designating the area as wilderness or releasing it for other purposes, or the plan establishing the WSA is amended to modify or eliminate the WSA designation.

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H. Protesting Decisions. WSA recommendations made through the planning process are protestable to the BLM Director under the provisions of 43 CFR 1610.5-2. Protest decisions by the Director are the final decision of the Department of the Interior.

**.07 Special Provisions Applicable to Alaska**. Pending further policy guidance from the Secretary of the Interior, BLM will not conduct wilderness inventories in Alaska under the provisions of Sections 201 and 202 of the FLPMA.

### **.08 Historic Background**

A. Section 603 of the FLPMA required the Secretary of the Interior to review all areas of the public lands and determine which contain wilderness characteristics and report to the President, Interior's recommendations for proposed new units of the National Wilderness Preservation System (NWPS) by October 21, 1991. Passage of this act also authorized BLM lands to become components of the NWPS for the first time, making wilderness preservation part of BLM's multiple-use mandate. Section 603 of the FLPMA also provided the original mandate for BLM to conduct wilderness reviews. Since all wilderness review mandates of Section 603 have been completed, except for Alaska, this section of the FLPMA no longer provides pertinent direction for our present recurring land-use planning wilderness inventories.

B. Present direction for inventories is provided by FLPMA in Sections 102 (a) (2) & (8), 201 (a), and 202 (c)(4) & (9) and land-use planning in Sections 202 (a), (b), (c), and 205 (b). These sections direct BLM to "preserve and protect certain public lands in their natural condition" and to "prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern." These Sections also direct the Bureau to utilize inventory information in the development of land-use plans and coordinate public land inventories and planning efforts with other Federal, State, and local agencies and Indian tribes.

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### **.1 Wilderness Inventory Procedures**

\_\_\_\_\_.11 Introduction. This chapter contains the procedural guidance for conducting wilderness inventories of BLM administered lands.

A. Starting the Inventory. The primary function of a wilderness inventory is to document the presence or absence of public lands with wilderness character. The inventory will include gathering information and preparing a file for each inventory area.

B. Public Involvement. Public involvement may be appropriate, under certain circumstances, in conducting a wilderness inventory.

C. Previous Studies. Wilderness Study Areas (WSAs) that were previously studied under Section 603 or Section 202 of FLPMA where recommendations are pending before Congress cannot be reinventoried until such time as the Congress acts on those recommendations.

.12 The Wilderness Inventory Process. The wilderness inventory is the process of determining the presence of roadless areas with wilderness character. Inventory areas found to possess the requisite wilderness values will be further evaluated through the land use planning process to determine if they should be designated as WSAs.

A. Identify Inventory Areas. Identify inventory areas from the categories of lands described earlier in this handbook in Section .06 B-D.

1. Identification of the specific area to be inventoried will require combining existing land status and available road inventory data. The resulting inventory area will be bounded by either a road, right-of-way, non-public lands, and/or areas containing land parcels withdrawn or otherwise not subject to wilderness inventory/planning. An inventory area may be larger than the actual acquired lands because of the need to look at any contiguous roadless federal lands.

2. Each inventory area should be named or numbered for reference. A numbering sequence should not duplicate any used in previous wilderness inventories or studies.

3. A permanent documentation file should be initiated for each area to be inventoried. Appendix A provides details on the appropriate contents of this file.

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B. Initiate the Inventory. Develop appropriate public notification of the intent to initiate a wilderness inventory.

C. Prepare the Inventory Area Evaluation.

1. Complete the Inventory Area Evaluation form (Appendix B), along with a Road/Way Analysis (Appendix C), and a Photo Log (Appendix D) for each inventory area. The sample forms in Appendices B, C, and D should be adequate for most wilderness inventories, but may be modified to meet field office needs.

2. The Wilderness Inventory Evaluation form, Appendix B, will assist BLM personnel in three ways. First, it will describe and document the presence, extent, and quality of wilderness values within an inventory area. Second, it will describe ownership patterns, existing uses, permanent structures, surface disturbances, size, and other features of the area. Third, it will provide an efficient and consistent way to display BLM findings.

3. Color prints or slides and maps should be used to document each inventory area. These should illustrate representative as well as unusual characteristics of the area. Such characteristics may include roads, ways, topographic and vegetative features, recreational attractions, human impacts, development and facilities, supplemental values, and any other natural or unnatural features which are important in evaluating the presence or absence of roads and wilderness values. Photos should be keyed to a large-scale map indicating the date the picture was taken, location of photo points, and the direction the camera was facing using the photo log in Appendix D.

### .13 Wilderness Values.

A. Analysis of Roads. It is important to evaluate whether the area being inventoried contains roads. Any roads should be clearly identified and their impact on the naturalness of the area evaluated. If an access route meets the road definition, its use and possible long term need should be described.

1. In order to insure a consistent identification of "roads" as opposed to a vehicle way, the following definition has been adopted:

"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 vehicle does not constitute a road."

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This language is from the House of Representatives Committee Report 94-1163, page 17, dated May 15, 1976, on what became the FLPMA. It is the only statement regarding the definition of a road in the law or legislative history.

2. The BLM will continue to base the definition of what constitutes a "road" from the FLPMA's legislative history. The BLM previously adopted and will continue to use the following sub-definitions of certain words and phrases in the BLM road definition stated above:

a. **"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.

b. **"Mechanical means"** - Use of hand or power machinery or tools.

c. **"Relatively regular and continuous use"** - Vehicular use which 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.

3. A route which was established or has been maintained solely by the passage of vehicles would not be considered 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".

B. Analysis of Wilderness Character. The inventory will evaluate wilderness characteristics as discussed in Section 2(c) of the Wilderness Act of 1964, and incorporated in the FLPMA, which states:

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“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.”

1. Size. Determine 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 criteria will be satisfied for inventory areas in the following situations and circumstances:

a. Roadless areas with over 5,000 acres of contiguous public lands. State or private lands are not included in making this acreage determination.

b. Any roadless island of the public lands of less than 5,000 acres.

c. Roadless areas of less than 5,000 acres of contiguous public lands where any one of the following apply:

(1) They are contiguous with lands which have been formally determined to have wilderness or potential wilderness values, or

(2) It is demonstrated that the area is clearly and obviously of sufficient size as to make practicable its preservation and use in an unimpaired conditions, and of a size suitable for wilderness management, or

(3) 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.

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a. Affected Primarily by the Forces of Nature. Determine if the area ". . . generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable."

(1) To do that, it must be possible to observe the area as being generally natural. It must appear to have been affected primarily by the forces of nature, and people's work must be substantially unnoticeable. It must retain its "primeval character." It should be an area where the earth and its community of life are untrammelled by humans and their activities. Trammel means anything that impedes or hinders free action.

(2) An area may include some human impacts provided they are substantially unnoticeable in the area as a whole. Examples of man-made features that may be substantially unnoticeable in certain cases are: trails, trail signs, bridges, fire towers, fire breaks, fire suppression facilities, pit toilets, fisheries enhancement facilities (such as fish traps and stream barriers), fire rings, hitching posts, snow gauges, water quantity and quality measuring devices, research monitoring markers and devices, wildlife enhancement facilities, radio repeater sites, air quality monitoring devices, fencing, spring developments, and small reservoirs.

b. Describing Human Impacts. Human impacts within the review area must be described. Only significant impacts that influence the determination of the area's naturalness should be documented. If several minor impacts exist, summarize their cumulative effect on the area's degree of naturalness.

(1) There is an important difference between an area's natural integrity and its apparent naturalness. Natural integrity refers to the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems in a given area. The presence or absence of naturalness (i.e., do the works of humans appear to be substantially unnoticeable to the average visitor?) is the question the Wilderness Act directs the review to assess.

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(2) Caution should be used in assessing the effect on naturalness that relatively minor human impacts create. Some human works are acceptable in designated wilderness; similar impacts in a inventory area should not result in a conclusion that the area lacks naturalness. An overly pure approach to assessing naturalness must be avoided.

c. Outside Human Impacts. Human impacts outside the inventory area will not normally be considered in assessing naturalness of a area. However, if an outside impact of major significance exists, it should be noted in the overall inventory area description and evaluated for its direct affects on the inventory area. Human impacts outside the area should not automatically lead to a conclusion that a inventory area lacks wilderness characteristics.

3. Solitude or a Primitive and Unconfined Type of Recreation. Determine 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 only has to possess one or the other. It does not have to possess outstanding opportunities for both elements, does not need to have outstanding opportunities on every acre. There must be outstanding opportunities somewhere in the area. When Inventory areas are contiguous to WSAs, evaluation of outstanding opportunities should consider and document whether Inventory areas have outstanding opportunities either on their own, or in combination with adjacent WSAs.

a. Outstanding Opportunities. The Wilderness Act does not specify what was intended by "solitude or a primitive and unconfined type of recreation." In most cases, the two opportunities could be expected to go hand-in-hand. However, the outstanding opportunity for solitude may be present in an area offering only limited primitive recreation potential. Also, an area may be so attractive for recreation use that it would be difficult to maintain opportunity for solitude; e.g. around water.

b. Each inventory area must be assessed on its own merits or in combination with an adjacent wildemess area or WSA as to whether an outstanding opportunity exists. There must be no comparison among areas. It is not permissible to use any type of rating system or scale, whether numerical, alphabetical, or qualitative (i.e., high-medium-low), in making the assessment. Good judgment must be used in determining that outstanding opportunities either do or do not exist in each area.

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(1) Dictionaries define "solitude," "outstanding," and "opportunity," as follows:

(a) Solitude: The state of being alone or remote from others; isolation. A lonely or secluded place.

(b) Outstanding: Standing out among others of its kind, conspicuous; prominent. Superior to others of its kind; distinguished; excellent.

(c) Opportunity: A situation or condition favorable for attainment of a goal.

(2) BLM defines "primitive and unconfined recreation" as nonmotorized, non-mechanical (except as provided by law), and undeveloped types of recreation activities.

c. Evaluating Qualities. Using these definitions, specific procedures for evaluating these qualities are outlined below.

(1) Solitude.

(a) Determine whether or not the area has outstanding opportunities for solitude. In making this determination, consider factors which influence solitude only as they affect a person's opportunity to avoid the sights, sounds, and evidence of other people in the inventory area, rather than to evaluate opportunity for solitude in comparison to human habitation.

(b) Do not assume that simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude. Similarly, do not conclude that simply because an area is relatively small, it does not have an outstanding opportunity for solitude. Consideration must be given to the interrelationship between size, screening, configuration, and other factors that influence solitude.

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(c) Factors or elements influencing solitude may include size, natural screening, and ability of the user to find a secluded spot. It is the combination of these and similar elements upon which an overall solitude determination will be made. It may be difficult, for example, to avoid the sights and sounds of people in some areas unless it is relatively large. A small area, however, may provide opportunities for solitude if, due to topography or vegetation, visitors can screen themselves from one another.

### (2) Primitive and Unconfined Recreation.

(a) Determine whether or not the area offers an outstanding opportunity for a primitive and unconfined type of recreation. In making this determination, consider those activities that provide dispersed, undeveloped recreation which do not require facilities or motorized equipment.

(b) Some examples of primitive and unconfined types of recreation are: hiking, backpacking, fishing, hunting, spelunking, horseback riding, mountain or rock climbing, river running, cross-country skiing, snowshoeing, dog sledding, photography, bird watching, canoeing, kayaking, sailing, and sight seeing for botanical, zoological, or geological features, or other activities permitted in wilderness.

(c) An area may possess outstanding opportunities for a primitive and unconfined type of recreation either through the diversity in the number of primitive and unconfined recreational activities possible in the inventory area or the outstanding quality of one opportunity. Other factors to consider:

(i) Present visitor use of an area is not necessary in evaluating this criterion. The factor to be determined is whether an outstanding opportunity is present, regardless of present amount of use.

(ii) The absence of a trail system or convenient access is not a valid basis for concluding that an outstanding opportunity for primitive and unconfined recreation does not exist.

(iii) The absence of water in an area is not a valid basis for concluding that an outstanding primitive recreation opportunity does not exist.

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(iv) "Challenge" and "risk" are appropriate for consideration under this criterion. However, their presence is not necessary in order to conclude that an area does qualify under this criterion.

### 4. Supplemental Values.

a. Determine if the inventory area contains ". . . ecological, geological, or other features of scientific, educational, scenic, or historical value." The Wilderness Act states a wilderness "may also contain" these values. Supplemental values are not required for wilderness but their presence should be documented where they exist.

b. A finding that an area being inventoried lacks any or all of the supplemental values should not affect the determination of the existence of wilderness character.

C. Boundary Adjustments. Where substantially noticeable human caused impacts occur within an inventory area, reviewers should consider the opportunity to adjust the area boundary to exclude the human impacts. Minor human impacts normally will not require a boundary adjustment, but where there are several minor impacts, they should be evaluated as to their cumulative effect on the apparent naturalness of all or part of the area. Boundary adjustments should be made to identify the parts of the area that appear natural and parts that do not. When boundary adjustments are made, a decision must be made on whether the remaining portion of the area is of sufficient size to find that it has wilderness characteristics.

1. When multiple human impacts are considered to be substantially noticeable, caution must be used in relocating the boundary to define the part of the area found to have wilderness character. Natural portions of a area located between the individual human imprints should not be automatically excluded.

2. When the boundary of the area found to have wilderness character is adjusted due to human impacts, the boundary should, where possible, be located on the physical edge of the "imprint of man". In this case, the boundary must eliminate the "imprint of man" and as little adjacent land as necessary. The adjusted boundary must not be drawn on a "zone of influence" around the imprint for these reasons: (1) consistency between inventory teams in locating this "zone of influence" would be difficult to achieve, and (2) future impacts would in effect be able to encroach on a area creating a new "zone of influence."