

Now, let's turn to Sam and Sam, I have a question for you.

And that has to do with the new guidance requires us to conduct the inventories, but does it require us to connect inventories on every single piece of BLM public lands?

>> S. Gaugush: No, Don.

The -- this new policy, it doesn't require a bureau-wide inventory or a state-wide inventory, or even a district-wide reinventory.

What it does require is that we maintain inventories and keep them up to date.

So managers have the discretion in when a wilderness characteristics inventory should be updated but I will run through some examples of when it would be worth checking and updating the inventory.

One of those is when the BLM or members of the public have identified wilderness -- lands with wilderness characteristics as an issue through scoping and in other phases of the NEPA process.

Another example would be when the BLM is undertaking a land use planning process, another example would be if the BLM has received information from the public or elsewhere that constitutes new information regarding lands with wilderness characteristics and I will just mention briefly that the inventory guidance attached in the I.M. does include a minimum standard that submissions from external parties would have to meet for the BLM to be able to consider that information.

It's also important to note that when the BLM does receive information from outside parties about lands with wilderness characteristics, it's important that the BLM conduct its own verification of the accuracy of that info and whether, indeed it meets our criteria.

Getting back to examples of when it would be a good idea to update the inventory, another final example is if the BLM has acquired additional lands that have not yet been inventories.

So the policy doesn't require a bureau-wide reinventory, but as time goes on and as plans are revised and amended, in this way, you eventually get up to date inventory bureau-wide that would be continuously maintained.

>> D. Charpio: Thanks, Sam.

It sounds like there are a number of triggers there, but we are not constantly doing this. It just depends on the situation.

Okay.

Now I have heard that a lot of our advocacy groups say that size is irrelevant.

We heard that 5,000-acre threshold and so forth.

How are the wilderness act's criteria applied to the new inventory guidance with respect to size?

>> D. Harmon: Okay.

Size is one of the mandatory criteria mentioned in Section 2c of the wilderness act.

So it's a very important criteria.

We normally start with identifying the boundaries as a unit we are looking at and then determining if it's of sufficient size.

The wilderness act, I want to describe one of its characteristics implies that wilderness characteristics are associated with a very large block of undeveloped roadless public land, and it gives the 5,000-acre minimum, contiguous acreage as the normal minimum size where one could consider they have wilderness characteristics present, but there can be exceptions to that and one of them, the wilderness act mentions that when it's demonstrated that the area is of sufficient size as to make practicable its preservation and use in an unimpaired condition.

So what does that mean?

It's saying there can be areas smaller than 5,000 acres under certain circumstances.

Well, it would be up to you to -- and your description analysis for size, you could consider an area less than 5,000 acres.

If there's something different about it, perhaps it's extremely remote, extremely rugged, it's extreme rugged topography might lend itself to offering outstanding opportunities for solitude even though it's not quite 5,000 acres.

I'm familiar with some areas like that in bureau of lands.

But it would be up to the person doing the inventory to make a clear case for that, and on the documentation forms, and to -- to carry that forward.

So that's one of the exceptions for the size criteria.

>> D. Charpio: Okay, guys.

So it's not an ironclad rule, but we have to have documentation as to when we will make the exception and you gave us --

>> D. Harmon: Right and I should emphasize we think it will be a rare case that happens here and there.

It's the exception rather than the rule.

>> D. Charpio: You mentioned contiguous lands.

How do contiguous lands that are federally owned affect the size criteria?

>> D. Harmon: Well, sometimes BLM shares the road with another agency that has authority to manage to protect wilderness characteristics.

There are three other agencies in that category.

That would be the forest service, the National Park Service and the U.S. Fish & Wildlife Service.

So sometimes we will have an area that's perhaps less than 5,000 acres on our side of the line, but there's an area that -- of the same roadless area that overlaps into the other agency's administration and so we have one roadless area, the public doesn't really care which side is which.

You know, it's a roadless area on public lands and so this is a case where as long as the BLM portion is in a natural condition, it would be considered to share the same characteristics identified on the other agency's land and it could be essentially a roadless area that meets the size exception on our side.

We need to make sure that whenever we are talking about adjacent lands we really coordinate closely with those agencies so they -- we know what they are thinking and they know what we are doing, you know, we need to really work closely together.

>> D. Charpio: Dave, just a side question here, is the National Park Service, forest service, are they doing inventories regularly to your knowledge?

>> D. Harmon: No, not regularly.

They -- they have -- they have had requirements under the wilderness act to review their roadless areas and they have made recommendations for those over time and then they also have roadless lands that they consider in their planning processes, but they are not under -- well, neither are we, under a straight requirement to inventory everything on a specific schedule.

So we want to make sure we talk to them closely whenever we're dealing with adjacent lands.

>> D. Charpio: Understood.

Sam, so this is a lot of work, obviously.

Who can conduct a wilderness inventory?

>> S. Gaugush: Well, maintaining the wilderness characteristics inventory is the BLM's responsibility.

That means it should be conducted by BLM staff or by trained contractors with BLM oversight.

The folks on the inventory teams don't necessarily need to be wilderness specialists or outdoor recreation planners, but they should have received some training in wilderness inventory procedures. So members of the public, whether it's cooperating agencies or members of external groups should not be on BLM inventory teams.

As I said, it's the BLM's responsibility; however, folks outside the BLM can still submit their own independent wilderness characteristics inventory information and the BLM will review that and consider it as it's updating its inventory.

So, again, I have said it before, but it's important that we always verify that information and receive it rather than taking it at face value.

Now, with that said about the public and the cooperating agencies not being on inventory teams, sometimes it's beneficial for the local manager to conduct a demonstration session for interested

parties and stakeholders where you would take the inventory team and those interested members of the public out to a piece of BLM land and walk them through the inventory process that you had already completed and explain how you reached that, be instructive and helpful to do that with the public.

>> D. Charpio: And I know Bob really supports that and so does the secretary.

It's all about that transparency.

So while we may get some input from the general public, we always have to validate that information, and we do want to try to educate them on the process as well.

Thanks, Sam.

We appreciate it.