

A proposal report to the Bureau of Land Management, Kingman Field Office, Arizona



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Prepared by:
Joseph M. Trudeau &
Amber R. Fields



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Cover Photo: From the northeastern corner of the unit, looking over miles of roadless Mohave Desert expanse, to the rugged volcanic and gneissic peaks of the Mount Perkins section of the Black Mountains.

All Photos by the authors.

## PREFACE: This Proposal was developed according to BLM Manual 6310

#### General Overview

Instruction Memorandum 2011-154 and Manuals 6310 and 6320 set out the BLM's approach to protecting wilderness characteristics on the public lands. This guidance acknowledges that wilderness is a resource that is part of BLM's multiple use mission, requires the BLM to keep a current inventory of wilderness characteristics, and directs the agency to consider protection of these values in land use planning decisions. <sup>1</sup>

In March 2012, the Bureau of Land Management issued updated manuals for inventorying and managing Lands with Wilderness Characteristics on public lands (hereafter often referred to as LWC's). These manuals provide the agency with direction for implementing its legal obligations to inventory and consider management of Lands with Wilderness Characteristics, including the Federal Land Policy and Management Act's provision that BLM "preserve and protect certain public lands in their natural condition" (43 U.S.C. § 1701(a)(8)). Manual 6310 (Conducting Wilderness Characteristics Inventory on BLM Lands) guides the BLM on how to meet its obligations to inventory for and identify lands with wilderness characteristics. Manual 6320 (Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process) guides the BLM on the options available to address lands with wilderness characteristics in land use planning once they have been identified in the required inventory, such as putting management prescriptions in place to protect wilderness characteristics. The purpose of this report is to provide the BLM with recommendations for designation of Lands with Wilderness Characteristics in the Kingman Resource Area of northwestern Arizona, based on new, accurate, and up-to-date information according to Manual 6310.<sup>2</sup>

What does Manual 6310 require for the identification of LWC's?

Minimum standards for LWC proposals are described in Manual 6310 in section .06.B.1. There are three things required in a citizens' wilderness proposal in order to meet the minimum standard for BLM to consider it in an inventory and to consider it as new information:

- Detailed map with specific boundaries;
- Detailed narrative of the wilderness characteristics; and
- Photographic documentation.

Once there is new information that meets these standards, then "as soon as practicable, the BLM shall evaluate the information," including field checking as needed and comparing with existing data to see if previous conclusions remain valid. Further, BLM will document its rationale and make it available to the public. (.06.B.2). This proposal report provides the three necessary criteria listed above.

 $http://www.blm.gov/wo/st/en/info/regulations/Instruction\_Memos\_and\_Bulletins/national\_instruction/2011/IM\_2011-154.html$ 

http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information\_Resources\_Management/policy/blm\_manual.Par.38337.File.dat/6310.pdf

<sup>&</sup>lt;sup>1</sup>Memorandum 2011-154 is available online at:

<sup>&</sup>lt;sup>2</sup> Manual 6310 is available online at :

What does Manual 6310 require for an area to be identified as an LWC?

Requirements for determining lands have wilderness characteristics are found in section .06.C.2 of Manual 6310. Lands with Wilderness Characteristics must possess the following traits:

#### Size

<u>Sufficient roadless area to satisfy size requirements</u> (5,000 acres, of sufficient size to make management practicable or "any roadless island of the public lands"; or contiguous with Wilderness, Wilderness Study Areas, USFWS areas Proposed for Wilderness, Forest Service WSAs or areas of Recommended Wilderness, National Park Service areas Recommended or Proposed for Designation).

#### Naturalness

<u>Affected primarily by the forces of nature</u> – The criteria is "apparent naturalness" which depends on whether an area looks natural to "the average visitor who is not familiar with the biological composition of natural ecosystems versus human affected ecosystems." This is an important distinction between ecological integrity and apparent naturalness.

<u>Human impacts</u> – Human impacts must be documented and some are acceptable so long as they are "substantially unnoticeable"; Examples include trails, bridges, fire rings, minor radio repeater sites, air quality monitoring devices, fencing, spring developments, and stock ponds.

<u>Outside human impacts</u> – impacts outside the area are generally not considered, but major outside impacts should be noted and evaluated for direct effects on the entire area (the manual explicitly cautions BLM to "avoid an overly strict approach").

• Outstanding opportunities for either solitude or primitive and unconfined recreation

The area does not have to possess both opportunities for solitude and primitive and unconfined recreation, nor does the area need to have outstanding opportunities on every acre; BLM cannot compare lands in question with other parcels; BLM cannot use any type of rating system or scale.

#### • Supplemental values

Ecological, geological, scientific, scenic, educational or historical features should be documented where they exist, although they are not required traits.

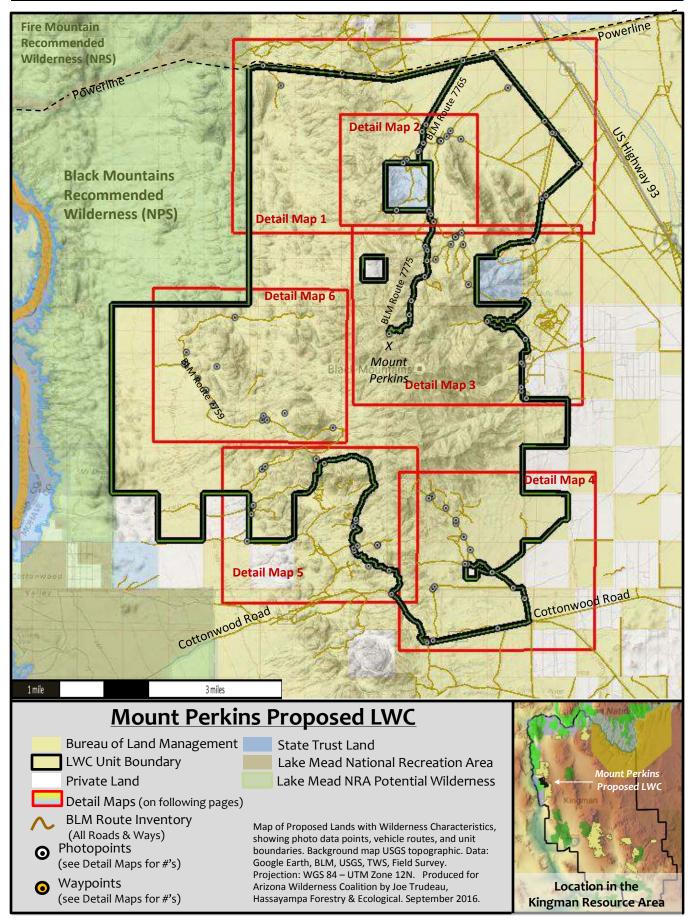
What does Manual 6310 require for the identification of the boundaries of an LWC?

Boundaries should be based on wilderness inventory roads and naturalness rather than opportunities for solitude or primitive and unconfined recreation. For inventorying wilderness characteristics, BLM will use the "road" definition from FLPMA's legislative history; the term "road" and "wilderness inventory road" are interchangeable in this guidance. The AWC survey team took a very literal, maintenance-driven approach to road/way determination.

- "Wilderness inventory roads" are routes which have been: (1) improved and maintained (when needed), (2) by mechanical means (but not solely by the passage of vehicles), (3) to insure relatively regular and continuous use.
- "Primitive routes" or "ways" are transportation linear features located within areas that have been identified as having wilderness characteristics and not meeting the wilderness inventory road definition.

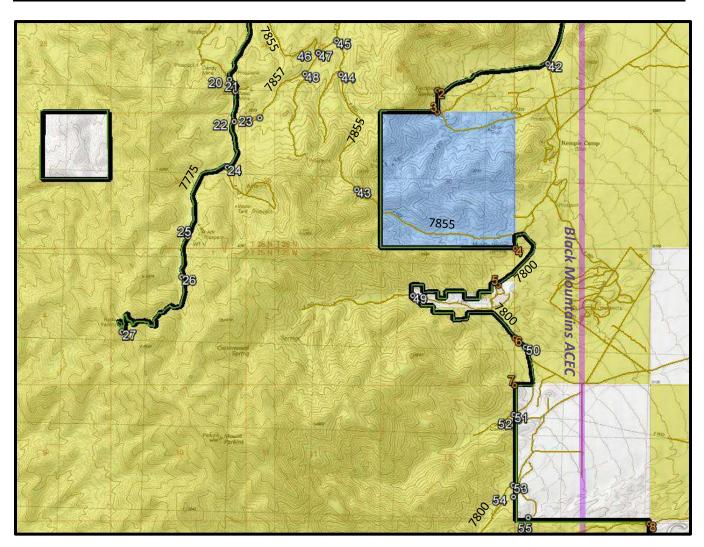
Lands between individual human impacts should not be automatically excluded from the area; no setbacks or buffers allowed; boundaries should be drawn to exclude developed rights-of-way; "undeveloped rights-of-way and similar possessory interests (e.g., as mineral leases) are not treated as impacts to wilderness characteristics because these rights may never be developed"; areas can have wilderness characteristics even though every acre within the area may not meet all the criteria.

MAP: Mount Perkins Proposed Lands with Wilderness Characteristics (LWC)

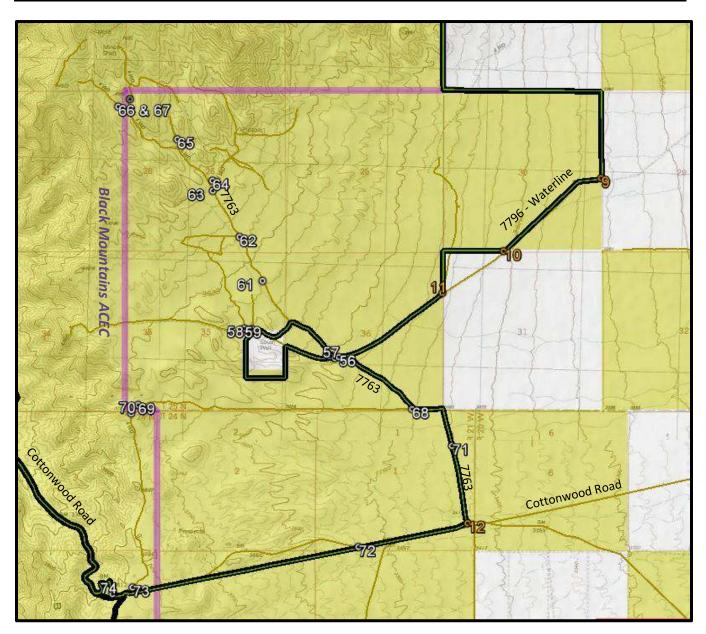


Detail Maps 1 & 2: Northern Unit Boundaries & Mockingbird Mine Inset Powerline Powerline Mockingbird Wilderness Study Area (1980-1989) **Black Mountains Proposed Wilderness** Wildlife Water Mocking bird 85 Mine **Black Mountains ACEC** Detail Map 2 - below **Detail Map 1 Mockingbird Wilderness Study Area** (1980-1989) 30 lack Mountains 3334835 13 992 **Black Mountains ACEC Detail Map 2** 

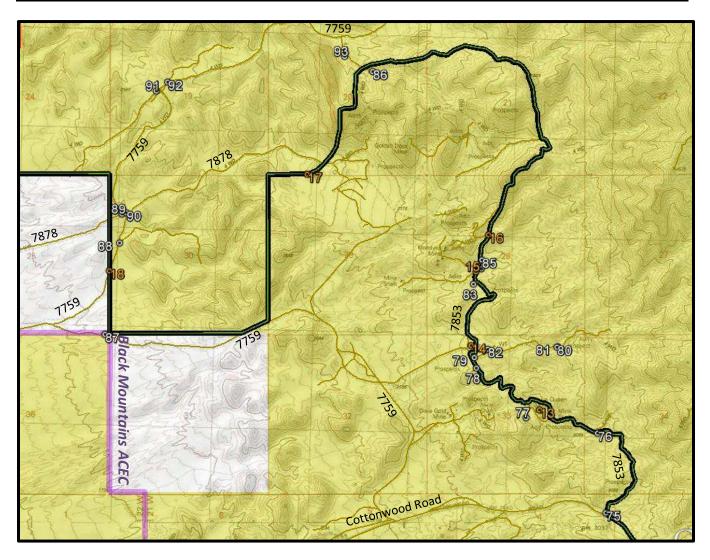
# **Detail Map 3: Mount Perkins Area**



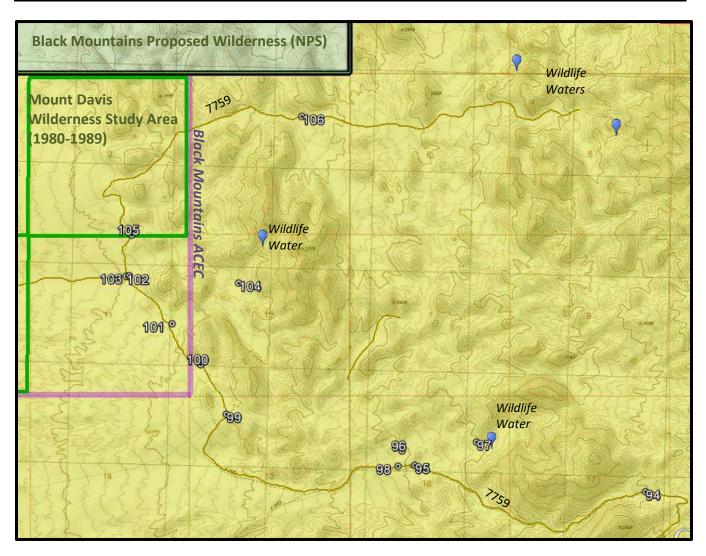
# **Detail Map 4: South Well Area**



# **Detail Map 5: Golden Door Mine Exclusion Area**



# **Detail Map 6: Western Canyons Area**



#### **SECTION 1: Proposed LWC Overview**

#### **Unit Location**

The Mount Perkins Proposed LWC is situated in the northwestern region of the Kingman Resource Area, in the northern part of the Black Mountains Range, about 40 miles northwest of the city of Kingman. Highway 93 in Detrital Valley is a few miles to the east, and the Colorado River is a few miles to the west. This proposed LWC is just north of the Black Mountains North Proposed LWC, and the two units share Cottonwood Road as a boundary in places. To the west is the Black Mountains Recommended Wilderness in Lake Mead National Recreation Area (NRA). The Black Mountains extend north another thirty miles to Lake Mead, and south another fifty miles to Interstate 40, southwest of Kingman.

# **Brief Boundary Description**

The boundary of Mount Perkins Proposed LWC consists of wilderness inventory roads, a powerline, the BLM property line, and a mining exclusion that follows a series of ridges and saddles. The northern proposed LWC unit boundary is entirely comprised of the 200 foot wide powerline right-of-way and its associated access road. The eastern boundary follows the BLM property line with State Trust and private lands, as well as several numbered and un-numbered wilderness inventory roads. The southern boundary is formed by wilderness inventory roads, including Cottonwood Road, an excluded area around the Golden Door, Dixie Queen, and Klondyke Mines, and the BLM property line with private land. The entire western unit boundary is the BLM property line with Lake Mead NRA.

## **Landforms & Biological Communities**

The proposed LWC encompasses 49,285 acres in the northern Black Mountains, a range which extends nearly one hundred miles from north to south, defining the rugged, scenic landscapes along the primary highways in northwestern Arizona. The Black Mountains are known for their convoluted volcanic geology, replete with steep mountainsides, knife-edge ridges, expanses of slickrock, and meandering canyons. Mount Perkins is the second highest peak of this range, soaring to 5,456 feet, which is ~4,300 feet higher than the units' lowest washes that drain to the west into the Black Mountains Proposed Wilderness in Lake Mead NRA. The summit rises nearly one mile above Lake Mohave. The Black Mountains run in a north-northwesterly to south-southeasterly direction through the unit, and with the exception of the farthest southwestern, northeastern, and southeastern corners of the unit, the area is entirely composed of rugged mountains incised by deep canyons.

The central band of highlands is composed of Early Proterozoic Metamorphic Rocks (1.6 to 1.8 billion years old) metasedimentary, metavolcanic, and gneissic rocks, forming the high, gently sloping ridges and peaks that form Mount Perkins. Most of the western third of the unit is composed of 11 to 38 million year old series of volcanic rocks, including, tuff, breccia, conglomerates, fine grained rhyolite & dacite, and pyroclastic flows. This section of the unit forms the most wild, contorted landscape one can imagine; a labyrinth of bright-colored, convoluted formations of slickrock domes, slot canyons, and broad, gravelly washes. The extreme edges of the unit consist of several million years of eroded sediments from the highlands (Arizona Geological Society, 2000).

The unit is within the Mohave Desert Ecoregion, and cloaked almost entirely by the Mohave Desertscrub Biotic Community, with the highest portion of Mount Perkins classified as the Great Basin Conifer Woodland Biotic Community (TNC, 2001; TNC, 2004). Most of the unit is relatively sparsely vegetated by the Sonoran and Mohave Mid-Elevation and Creosotebush-White Bursage Desert Scrub Ecological Systems, but there are also some expanses of Mogollon Chaparral and Pinyon-Juniper Woodlands (USGS, 2015). The landscape of the eastern slopes of the range would be far more densely vegetated with juniper, Mohave yucca, turbinella oak, mesquite, and other shrubs had it not experienced some widespread wildfires over the last few decades. The most intensely burned areas have converted to vast annual grasslands, punctuated with a range of desert wildflowers. This is in stark contrast to the western slopes, which are clad in mature representations of these plant communities.

#### **Previous Wilderness Inventories**

Portions of the proposed LWC have previously been identified by BLM as having wilderness character during the 1979/1980 Intensive Wilderness Inventory process. At that time, most of the proposed LWC was still a checkerboard of BLM and private ownership, so the land available for wilderness study was drastically less than today.

#### Mockingbird Wilderness Study Area

The northernmost portion of the proposed LWC was identified as "Unit AZ-020-008 - Mockingbird Proposed Wilderness Study Area" (BLM, 1980a). The agency said this about the 5,815 acre unit:

"The overall impact of the vehicle ways and mining activities within the unit is negligible and substantially unnoticeable, and the unit appears to be affected primarily by the forces of nature. The unit does not possess outstanding opportunities for solitude or primitive and unconfined recreation by itself because of its small size. But it does contain outstanding opportunities when considered with the contiguous National Park Service wilderness proposal. We propose that this unit undergo wilderness study." (BLM, 1980a: p. 71)

The BLM later furthered this when it again stated that the unit "contains outstanding opportunities when considered with the contiguous National Park Service wilderness proposal" (BLM, 1980c). Unfortunately, the BLM later proposed the unit be returned to multiple use management because

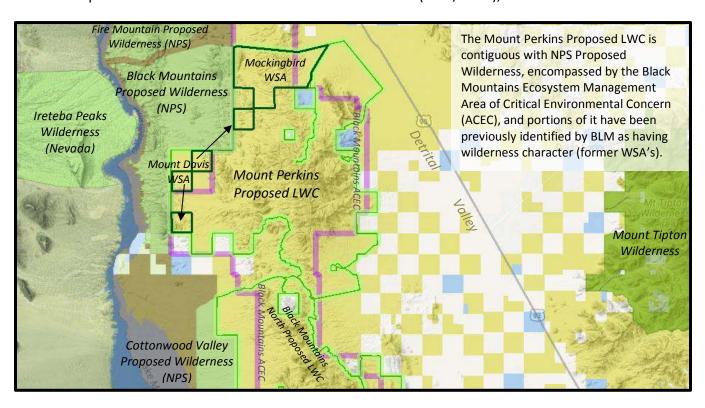
"Five expected exploration programs would produce one large open-pit mine in section 15 and one medium sized open-pit mine in section 7. The total disturbance (910 acres) would involve seven miles of road, 600 acres in the large open-pit and 300 acres in the medium sized mine" (BLM, 1987b: p. 13).

Nearly 30 years later, the open pit mines have never been developed. Some prospecting has occurred, but we are unsure if that happened before or after the 1987 decision. Photopoints 2, 7, 12, and 13 show examples of the routes developed by prospectors, which are undeniably minor, seldom-used primitive ways.

## Mount Davis Wilderness Study Area

Four sections of BLM land contiguous with the Black Mountains Suitable Wilderness (USDI, 1979) were proposed by BLM to undergo wilderness study because they were "a natural continuation of the National Park Service wilderness proposal and materially contribute to that proposal" (BLM, 1980a: p. 74). These parcels, collectively recorded as "Unit AZ-020-021 – Mt. Davis Proposed WSA" were later dropped from consideration by the BLM. However, under pressure from the public, who strongly supported wilderness study, the agency proceeded with the designation of the four parcels as the Mount Davis Wilderness Study Area, because of strong arguments in favor of the units being a "logical extension and natural continuation of the Lake Mead Recreational Area wilderness proposal" (BLM, 1980c).

The BLM later proposed that all 2,560 acres of the Mount Davis WSA be returned to multiple use management because of plans to develop an open-pit mine in Section 30 that would disturb 300 acres and require building two miles of road (BLM, 1987b). Our inventory did not discover any evidence of this activity ever occurring, so the former WSA retains the original wilderness characteristics that the BLM identified in their original inventory. The BLM has stated that "three of these four sections have remained free of disturbances and appear to have been affected entirely by the forces of nature" and that the WSA "is notable for its remoteness and difficulty of access" (BLM, 1987b: pp. 95-96). The BLM further cited the necessity of accessing the Mount Davis water catchment (the only disturbance noted, in the fourth section) as a reason for removing the unit's WSA status, however, the catchment appears to be on private land, a short distance south of the BLM section referenced in the 1987 EIS (the catchment is actually within the NW quadrant of Section 27 of T25N R22W). Also, the agency stated there were plans to construct a second catchment in the WSA (BLM, 1989), but that never occurred.



#### **SECTION 2: Wilderness Characteristics**

### The proposed LWC meets the minimum size criteria for roadless lands

The Mount Perkins Proposed LWC encompasses 49,285 acres of roadless wildlands. The LWC unit excludes three private inholdings, two communications antennae, and two cherrystems:

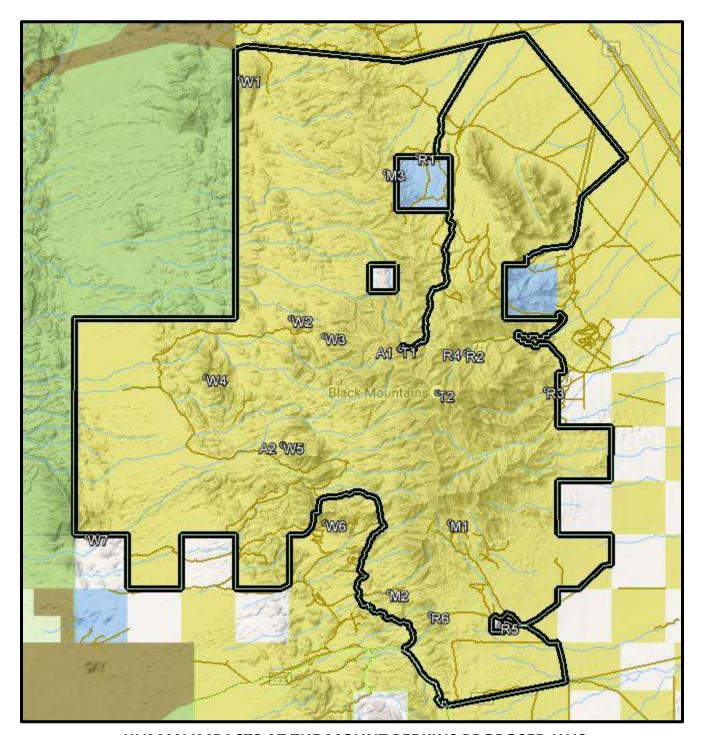
- 1) One full section of State Trust Land (Section 22 of T26N R21W) forms an inholding with a cherrystemmed road leading to it. The cherrystem is comprised of BLM Routes 7765, 7804, and 7859. This parcel contains the Mockingbird Mine and a number of related prospects and shafts.
- 2) The cherrystem mentioned above extends through the State Trust land and out the southern end becoming BLM Route 7775, which leads to a radio communications facility on the northern shoulder of Mount Perkins (in the SW quadrant of Section 3 of T25N R21W). The route is a lightly-used, narrow two-track that has relatively little impact on the surrounding area (see photopoints 17 and 25), and all of the primitive routes that spur from it are clearly unmaintained ways that are very lightly used and have no impact to naturalness (see photopoints 17-24, and 26). A second, much smaller antenna is one mile to the southeast, on the summit of Mount Perkins. This site is reached by foot or horseback, and is also excluded.
- 3) A private parcel (the NE quadrant of Section 33 of T26N R21W) of about 160 acres is located southwest of the Dandy Mine and has no vehicle access route or any developed improvements.
- 4) A private parcel (South Well; the SE quadrant of Section 35 of T25N R21W) of about 40 acres, located in the southeastern corner of the unit, has been excluded, along with two wilderness inventory roads providing access (BLM Routes 7763 and 7796), and the area impacted by ranching activities.

It is our determination that the above inholdings, infrastructure and cherrystems do not substantially affect the naturalness of the Mount Perkins Proposed LWC. When considering the impacts of these cherrystem roads and inholdings, it is important to remember that... "Human impacts outside the area will not normally be considered when assessing naturalness of an area" (BLM Manual 6310, p. 7). Because these routes and parcels are not included within the proposed unit, they do not detract from the naturalness of the Mount Perkins Proposed LWC.

#### The proposed LWC is affected primarily by the forces of nature

#### **Primitive Routes**

Some primitive routes (ways) occur in the unit. These routes, described in detail in Section 3, are lightly used or un-used, single lane two-tracks. It is our determination that the existence of these routes does not substantially affect the wilderness user experience. Describing vehicle ways in the eastern portion of the Mockingbird WSA, the BLM stated that the more than four miles of routes were "indistinct and unnoticeable for the most part and have very little impact on the apparent naturalness of the area" (BLM, 1987b: p. 75). We too believe that most of the routes documented within the proposed LWC have minimal impact to naturalness. Significant routes have been excluded from the unit or used to define the unit boundary.



**HUMAN IMPACTS AT THE MOUNT PERKINS PROPOSED LWC** 

(Locations shown are described in the following pages)

State Trust Lands, private lands, and active mining operations with currently maintained, ongoing uses have been provided with cherrystemmed access routes, or completely excluded from the unit. Human impacts within the proposed LWC boundary include deteriorating ranching infrastructure, abandoned mining and prospecting, wildlife water catchments, and weather monitoring stations. The impacts are generally localized and of minimal visual impact, causing negligible impacts to the apparent naturalness of the unit. Impacts such as these are not uncommon in wilderness areas elsewhere. The power of nature to reclaim sites that have been impacted in the past is profoundly displayed in the proposed LWC.

#### Ranch Infrastructure

Very little ranch infrastructure occurs within the proposed LWC. The map on page 15 shows six ranch-related impacts to naturalness. Point R1 is a windmill sunk into a flooded mine shaft, with deteriorated piping and plastic and steel tanks strewn about in the general area (see Photopoint 11). Most of the impacts are on State Trust Land, but they extend onto the proposed LWC. Because most of the impacts are not technically in the unit, their impacts to naturalness are negligible, however, it appears important to hold the responsible party accountable to clean up the debris. Points R2 and R3 are sandy canyon bottom areas with flood-destroyed piping exposed in some places. The impacts are minimal and only noticeable when directly encountering the debris, and could easily be cleaned up by volunteer land stewards. Point R4 is an antique dam structure that has been destroyed by post-wildfire flooding. Structures like this are not uncommon in wilderness areas. Point R5 is the South Well windmill and water tanks on private land, which has been excluded from the unit. Point R6 is a feed or water trough that is a tiny, localized impact. Fencing occurs throughout the unit in low densities, but that is not inconsistent with wilderness character.

#### Wildlife Water Catchments

In cooperation with the Arizona Desert Bighorn Sheep Society, AZGFD has constructed 25 water catchments in the Black Mountains to primarily benefit the desert bighorn sheep herds, including five water catchments within the proposed LWC, and two nearby. Point W1 is at a saddle between two hills at the edge of the unit, so it is blocked from view from most of the surrounding area and especially the core of the unit. Point W2 is the most visible of the catchments, but still only impacts the surrounding acres. Point W4 is tucked into a deep slot canyon and is almost impossible to see (see Photopoint 104). Point W5 is very well painted to match the yellow tuff in the basin (see Photopoint 97). Points W6 and W7 are outside of the proposed LWC and do not impact naturalness. Point W3 was not located during field inventory and therefore is obviously almost impossible to see and does not impact naturalness. These installments are built to blend in with the surroundings, and are often painted to match the local rocks. The BLM has stated that these catchments "were designed to blend into their surroundings [and] therefore have but a minimal impact on naturalness" (BLM, 1987: p. 75). Currently, AZGFD maintains catchments in several of the existing wilderness areas in the Kingman Resource Area. It is our determination that, because such installments can be accommodated within LWCs, that these five in particular do not substantially affect the naturalness of the unit.

#### Weather Radio

Mohave County maintains a system of 172 fully automated weather monitoring stations called the "Mohave County ALERT (Automated Local Evaluation in Real Time) Flood Warning System". These sites are distributed throughout the county across land ownership. Two such 20 foot tall towers occur in or around the unit. One is at the top of the north peak of Mount Perkins, included within the area excluded from the unit for the communications tower (Point A1). The other (Point A2) is located at the Tufa water catchment (Point W5) and is hardly noticeable compared to the dramatic colorful mountainsides. The units have no legal right-of-way access granted by BLM.

## **Inactive Mining**

Old evidence of mining and/or prospecting occurs at several areas within the proposed LWC, but all current activity was excluded from the unit. The diggings are revegetating with native plants and do not create a substantial visual impact to the casual visitor (see Photopoints 2, 6, 13, and 84 for examples). Point M1 is an area on the southeastern ridge of Mount Perkins that was mined at least 50 years ago. The excavations are all naturalizing very well. The photo below shows the view of this basin, where the impacts are barely discernable. Point M2 is one example of prospects along the southern unit boundary that have revegetated and see almost no current vehicle use (see Photopoints 76, and 79 through 93 for examples of how well vegetated and lightly travelled these abandoned routes are). Point M3 represents a general area that was prospected heavily a very long time ago. The prospects were already old when the BLM catalogued the Mockingbird WSA, stating that vehicle ways in that area were "indistinct and unnoticeable for the most part and have very little impact on the apparent naturalness of the area" (BLM, 1987b: p. 75). Claim stakes occur throughout the unit at claim corners, but no active mineral exploration is currently underway. The presence of mineral claims does not affect naturalness, as "undeveloped possessory interests (e.g., mineral leases) are not treated as impacts to wilderness characteristics because these rights may never be developed" (BLM Manual 6310, page 10).



This photo shows the basin that was mined decades ago. The hillside is covered with numerous excavated trenches or terraces, but has mostly revegetated and appears natural to the average visitor.

#### **Communications Towers**

The single largest impact to naturalness in the proposed LWC are the two communications tower sites, one at the summit of Mount Perkins, and one on the ridgeline north of the summit. Both sites are excluded from the unit, so their impact is considered an 'outside impact'. The summit site is actually a very small site and cannot be reached by vehicle; foot and helicopter access are the only way to reach the site. The northern site is reached by the cherrystemmed route that cuts into the unit from the northeast. When at the summit of the mountain, the sites are certainly noticeable, but from almost anywhere else in the unit they are a benign spot in an otherwise huge, empty wilderness, if visible at all. The photo below is a view from the western interior of the unit, looking almost five miles east at the summits of Mount Perkins. The antennae are absolutely of no impact to naturalness from this spot and many more elsewhere in the unit. This photo also highlights the incredible geologic scenery and the outstanding terrain for hiking and backpacking.



## Summary of Human Impacts

Collectively, the impacts described above do not substantially detract from the naturalness of the proposed LWC. The unit is considered substantially natural to the average visitor. Substantial impacts have been excluded from the unit, such as communications towers, State Trust lands, two frequently used windmill/corral sites, and the heavily impacted current and past mining at the Golden Door, Dixie Queen, and Klondyke Mines. These sites around the unit do not substantially impact the wilderness experience in the area.

#### The proposed LWC provides outstanding opportunities for solitude or primitive & unconfined recreation

The BLM stated that the Mockingbird WSA, despite being a small unit, does provide some opportunities for solitude where "the numerous washes provide a number of hidden, secluded spots, and the rugged topography in general provides screening from the sights and sounds of other people" (BLM, 1987b: p. 75), and they further elaborate that the opportunities are indeed outstanding when considered in conjunction with the adjoining National Park Service proposed wilderness area. Regarding the Mount Davis WSA, the BLM stated that because of their isolated location and small size, the four parcels would not provide solitude, but when considered with the adjoining proposed wilderness in Lake Mead NRA opportunities for solitude "are outstanding, and provide a large, wild area with excellent topographic relief and complexity" (BLM, 1987b: p. 95). The agency stated that opportunities existed for hiking, backpacking, photography, and sightseeing for geological and zoological features, specifically the colorful volcanic hills and the possibility of seeing bighorn sheep, golden eagles, desert tortoise, and Gila monsters (BLM, 1987b).

Now that the contiguous BLM acreage has grown from 6,500 acres to nearly 50,000 acres, these opportunities are vastly more outstanding. Multi-day backpacking trips can be enjoyed, linking the Colorado River to the myriad peaks of Mount Perkins by way of a number of washes, canyons, and foothills. Opportunities for observing wildlife are outstanding, considering the 5,000 feet of relief available in this area, across arbitrary administrative boundaries. Because of this relief, combined with the sprawling nature of Mount Perkins, hikers are presented with literally hundreds of ridgelines to scramble up from starting points around the unit boundary.

The sense of solitude and isolation available in this proposed LWC is profound. The western side of the unit is obviously very remote and seldom visited, but even the eastern savannas provide such opportunities, as they are broad, empty, desolate plains with expansive views of the Cerbat Mountains, the White Hills, and of course, the massive Mount Perkins. Three major canyons fall towards these plains from the summits of Mount Perkins, providing enjoyable, and challenging loop options for day ascents of the peak from the east. The volcanic peaks east of the Mockingbird Mine provide outstanding opportunities for technical scrambling to serrated ridgelines, and they form an isolated grassland valley with absolutely no trace of human impacts. While the unit is lacking in vegetative screening, it more than makes up for it in a prolific amount of topographic screening, and by the generally vast character, with tremendous expanses of undeveloped wilderness that can conceal many visitors at any given time.

Photographic opportunities are incredible in this place, which we believe has the possibility of becoming a popular backcountry destination. The splendor of the geologic formations in the western portion of the unit is amazing, showcasing a range of colors and textures on par with the Grand Canyon. Incredible images could be captured at a number of isolated summits or narrow canyons, showcasing spring wildflower blooms, flash floods, waterfalls during thunderstorms, the play of light over rocks, and of the abundant wildlife. Reaching these locations by foot or horseback would make the experience of capturing the images of wildness even more rewarding.

#### The proposed LWC has supplemental values that enhance the wilderness experience & deserve protection

The proposed LWC would protect a portion of an Area of Critical Environmental Concern Approximately 36,000 acres of the proposed LWC are encompassed by the Black Mountains Ecosystem Management ACEC. This special management area is protected for premiere bighorn sheep and wild burro habitat, federal candidate plant species habitat, outstanding scenic values, open space near major population centers, and rare and outstanding cultural resources (BLM, 1993: p. 89). The additional level of protection offered by designation as an LWC would help the BLM achieve the conservation objectives that the ACEC was intended to protect.

The proposed LWC is contiguous with National Park Service Recommended Wilderness

The entire western boundary of the Black Mountains North Proposed LWC is contiguous with the Black Mountains Recommended Suitable Wilderness in Lake Mead National Recreation Area. This 17,970 acre unit provides the backdrop to users of Lake Mohave, with "scattered washes and side canyons [that] transect the Black Mountains from east to west as they wend their way to the Colorado River" (USDI, 1979: p. I-7). The proposed LWC shares twelve miles of contiguity with the entire eastern boundary of the Black Mountains unit, suggesting that the wilderness characteristics within the Park Service unit are also present in the proposed LWC. In fact, the BLM has previously stated that the wilderness values present in the proposed LWC are made outstanding by the adjoining proposed wilderness in Lake Mead NRA (BLM, 1980a; BLM, 1987b; BLM, 1989).

The proposed LWC has previously been recognized for its wilderness characteristics. The Mockingbird and Mount Davis Wilderness Study Areas were established in 1980 after the BLM recognized the apparent naturalness of the areas and the outstanding opportunities for primitive recreation and solitude provided by the units in conjunction with the neighboring Park Service Recommended Wilderness. Since the BLM released the WSA's to multiple-use management, the agency has substantially consolidated ownership and 'blocked up' a substantial portion of the Black Mountains in public ownership, and the mining that was used as a reason to remove the units from wilderness consideration never occurred. Now that the formerly checkerboarded lands form contiguous BLM-owned land, we argue that the previously identified wilderness qualities described for the WSA's have in fact expanded and improved to provide an exceptional degree of outstanding opportunity for primitive recreation and solitude, and the naturalness of the area has improved by three more decades of revegetation and naturalization of older mining and ranching impacts.

The proposed LWC would help the BLM achieve the agencies ecosystem management goals. The Black Mountains Ecosystem Management Plan, a collaboratively developed management vision for the Black Mountains, identified the following goals for the Black Mountains ecosystem: maintaining diverse and abundant native plant communities; maintaining biodiversity and overall ecological integrity; maintaining wildlife movement corridors; providing for a spectrum of recreational opportunities; preserving the areas wilderness character; increasing our knowledge of the ecosystem; and protecting cultural resources (BLM, 1996). In this, and other documents (for example, BLM, 1993 & AZGFD, 2007), the BLM has identified roads, off-road driving, mining, and ranch developments as

threats to the stability of sensitive wildlife species, habitat vitality, and overall ecosystem health. Protection of the Mount Perkins unit as Lands with Wilderness Characteristics would provide an effective tool for meeting the goals stated above, and would be congruent with the agencies previous determinations in that portions of the area contained wilderness characteristics.

The proposed LWC would protect exceptional wildlife habitat for sensitive species

The proposed LWC unit includes abundant, high-quality wildlife habitat in a pristine, largely untrammeled mountain range. The predominately public ownership of the Black Mountains over a long period has protected them from significant habitat disturbance. The Black Mountains contain crucial bighorn sheep habitat for the wildlife watcher or hunter, and the proposed LWC in fact provides tens of thousands of acres of crucial bighorn sheep habitat (BLM, 1987b). The Black Mountains also provide habitat for wild burros. "The Black Mountains have been identified as one of the BLM's outstanding wild burro herd areas in the West" (BLM, 1993: p. 87) and the range is managed as a special herd management area by the BLM. The proposed LWC offers prime opportunities for burro enthusiasts to watch or photograph these beautiful animals, regardless of the management challenges that the animal presents with regards to balancing forage needs for multiple species and livestock demands.

The Arizona Heritage Data Management System confirms the following species occurrences:

## Confirmed in the Middle Water Spring quadrangle

(the eastern third of the proposed LWC)

| Form | Common Name     | Scientific Name   |
|------|-----------------|-------------------|
| bird | Golden eagle    | Aquila chrysaetos |
| bird | Swainson's hawk | Buteo swainsoni   |

plant Cerbat beardtongue Penstemon bicolor ssp. roseus

plant Owens Valley cotton thorn Tetradymia stenolepis

Source: http://www.habimap.org/habimap/

#### Confirmed in the Mount Perkins quadrangle

(the western two-thirds of the proposed LWC)

| Form | Common Name  | <b>Scientific Name</b> |
|------|--------------|------------------------|
| n/a  | Bat colonies | n/a                    |

mammal Pale Townsends big-eared bat Corynorhinus townsendii pallescens

mammal California leaf-nosed bat Macrotus californicus

plant Gray gilia Gilia cana

plant Eplings monarda Monarda eplingii

Source: http://www.habimap.org/habimap/

Known occurrences of rare and imperiled species only tell part of the story. Places like the Mount Perkins Proposed LWC are typically under-surveyed for such species. The Arizona Heritage Data Management System's records for known special status species occurrences in the entire Black Mountains suggest that there is appropriate habitat within the proposed LWC such that many of the following species may in fact occur within the unit, including ten vascular plants (*Castilleja minor* 

spiralis, Senna armata, Selinocarpus nevadensis, Arctomecon californica, Stillingia linearifolia, Chrysothamnus teretifolia, Petalonyx nitidus, Enceliopsis argophylla, Opuntia echinocarpa, and Purshia glandulosa); and eight bats (Allen's Big-eared Bat, Big Brown Bat, Brazilian Free-tailed Bat, California Myotis, Fringed Myotis, Greater Western Bonneted Bat, Pallid Bat, and the Western Pipistrelle) (AZGFD, 2007; http://www.azgfd.gov/w\_c/edits/species\_concern.shtml). Additionally, the BLM has reported that a number of iconic species probably occur in this area:

## Species which probably occur in the proposed LWC

(based on reported species for Wilderness Study Areas)

| Form    | Common Name               | Scientific Name       |
|---------|---------------------------|-----------------------|
| bird    | Prarie falcon             | Falco mexicanus       |
| bird    | Merlin                    | Falco columbarius     |
| bird    | Ferruginous hawk          | Buteo regalis         |
| bird    | Zone-tailed hawk          | Buteo albonotatus     |
| bird    | Sharp-shinned hawk        | Accipiter striatus    |
| bird    | Coopers hawk              | Accipiter cooperii    |
| bird    | Burrowing owl             | Athene cunicularia    |
| bird    | Cattle egret              | Casmerodius albus     |
| bird    | Snowy egret               | Egretta thula         |
| bird    | Black-crowned night heron | Nycticorax nycticorax |
| reptile | Desert tortoise           | Gopherus agassizi     |
| reptile | Gilberts skink            | Eumeces gilberti      |
| reptile | Desert night lizard       | Xantusia vigilis      |
| reptile | Gila monster              | Heloderma suspectum   |
| reptile | Desert rosy boa           | Lichenura trivirgata  |
| mammal  | Kit fox                   | Vulpes macrotus       |

Source: BLM, 1989: Arizona Mohave Wilderness Final EIS

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### **SECTION 3: Detailed Boundary & Routes Description**

### Narrative Description of the Proposed LWC Boundary

This section of the report provides a detailed boundary description for the Mount Perkins Proposed LWC unit, including all wilderness inventory roads that comprise the unit boundary, all of the primitive routes/ways that permeate the unit boundary, and all other boundaries, such as land ownership, utility corridors, and other excluded areas. Many portions of the unit boundary have been determined according to wilderness inventory road identification protocols described in BLM Manual 6310, which states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying lands with wilderness characteristics. Furthermore, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means, but is no longer being maintained by mechanical methods is not a road. A wilderness inventory road, by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310, p. 11). Based on these criteria, the Mount Perkins Proposed LWC unit contains approximately 49,285 contiguous roadless acres. The Photopoints described here of the Mount Perkins Proposed LWC are listed in detailed tables with photographs following this description. Beginning at Waypoint 1, the proposed LWC unit description will move clockwise around the unit.

## **Northern Boundary**

The northern proposed LWC unit boundary is entirely comprised of the powerline and its associated right-of-way. Waypoint 1 marks the northwestern corner of the Mount Perkins Proposed LWC unit. From Waypoint 1, the northern Mount Perkins Proposed LWC unit boundary is the powerline and associated right-of-way. Continuing to the east, Photopoint 1 depicts the beginning of an unnamed way that enters the proposed LWC unit from the north. This way contains no signs that it is being maintained; making it a way, not a road as defined by BLM Manual 6310. Photopoint 2 documents that the primitive route shown in Photopoint 1 eventually fades out and ends. Beyond Photopoint 2, this way has naturalized. The BLM route inventory data layer shows this way continuing down a nearby wash, but no evidence of such a route was located on the ground. Photopoint 3 was taken looking down the powerline running along Mount Perkins northern proposed LWC boundary. Photopoint 4 looks south down an unmaintained primitive route with no apparent purpose. Due to a lack of maintenance the route shown in Photopoint 4 is a way, not a road.

Photopoint 5 was taken looking down a cherrystem that goes south into the Mount Perkins Proposed LWC. Photopoint 5 depicts BLM Route 7765 (wilderness inventory road), which accesses State Land to the south. BLM Route 7765 is a cherrystem because it is likely to be maintained if needed because it serves as access to State property. Photopoint 6 documents an unnamed primitive route that was not constructed, displays no signs of mechanical maintenance, has no clear purpose, and is maintained solely by the passage of vehicles. Because the primitive route in Photopoint 6 has no signs of mechanical maintenance, it is a way, not a road as defined by BLM Manual 6310. Photopoint 7 displays

the image of an unnamed primitive route heading north into the proposed LWC unit. As Photopoint 7 illustrates, this is an unmaintained route that appears to be kept open solely by the passage of vehicles, and has no obvious purpose. Due to a lack of maintenance, this is a way, not a road. The BLM route inventory data displays a "Need to Verify" route stemming from the way in Photopoint 7, however, no such route exists on the ground. Photopoint 8 shows BLM Route 7804 as it heads northeast from the cherrystem. The primitive route in Photopoint 8 contains no signs of maintenance; meaning that it is an unmaintained way. South of Photopoint 8, the cherrystem road becomes BLM Route 7804 for a short distance. Just north of Photopoint 9, the cherrystem becomes BLM Route 7859. Photopoint 9 was taken looking south down BLM Route 7859, which serves as access to the State Land to the south. Again, this is a cherrystem because this road is likely to be maintained since it accesses State property. Photopoint 10 depicts BLM Route 7804 heading southeast toward the State Land. As the photo displays, this is an unmaintained primitive route which is evidenced by the vegetation growing in the middle of the way. This much vegetation indicates that this way has not been mechanically maintained within the last few years.

Photopoints 11- 16 document various primitive routes that leave the State Land and enter BLM property. Photopoint 11 depicts BLM Route 7804 as it leaves State Land and ends at a windmill. As Photopoint 11 displays, there is not a maintained route here. This area is debris-filled, with old plastic pipes and other junk strewn about; a trash clean-up would beneficial. The BLM route inventory data shows a couple of routes leaving this area. It was very difficult to find these supposed routes on the ground. Photopoint 12 shows one such primitive route that has been reclaimed and is naturalizing. Photopoint 13 displays a BLM "Need to Verify" route that is revegetating, shows no signs of vehicular use, and has been reclaimed by nature. On the southern side of the State inholding, Photopoint 14 pictures an unnamed primitive route that is not maintained, has no apparent purpose, and is revegetating; making it a way, not a road. This route is entirely grown in and is used extremely rarely. Vehicle passage into BLM from State Land required tough route-finding. For all these reasons, we determined that this old

way has been reclaimed. To the east of Photopoint 14, Photopoint 15 displays the image of a natural wash that the BLM identified in their route inventory as BLM Route 7775. This supposed route passes onto BLM property to the east of Photopoint 15, which is why it is documented here. As Photopoint 15 displays, this is a natural wash with no signs of vehicular use. Photopoint 16 shows the unmaintained condition of BLM Route 7859. This primitive route used to access a mine, but now has no clear purpose, and is a way due to a lack of maintenance.

Photopoint 17 depicts BLM Route 7775, which was constructed, and is likely to be maintained because it provides access to two radio towers on top of one of the mountains to the northwest of Mount Perkins. BLM Route 7775 is likely to be maintained because it provides access to important infrastructure; it is therefore a wilderness inventory road and a cherrystem into the Mount Perkins Proposed LWC from State Land. Photopoints 18-27 will describe this cherrystem and the primitive routes branching from it. Photopoint 18 shows a faint track heading northeast from BLM Route 7775. As the photograph depicts, vehicles may have driven here in the past, but this is not a maintained road or way. To the south Photopoint 19 displays an image of BLM Route 7855, which was not constructed,

gets almost no vehicular use, and is not being maintained; making it a way, not a road. The BLM route inventory data has BLM Route 7855 displayed in the wrong location compared to what actually exists on the ground. Continuing south down the cherrystem, Photopoint 20 is the next point of interest. Photopoint 20 was taken looking northwest up the southern end of BLM Route 7859. As the photograph shows, there is mature perennial vegetation growing in the middle of this primitive route indicating that it is not being maintained. Due to a lack of maintenance and because this primitive route is kept open solely by the passage of vehicles; BLM Route 7859 is a way, not a road as defined by BLM Manual 6310. Farther to the south, Photopoint 21 shows a short unnamed spur that contains no evidence of construction, is apparently kept open only by the passage of vehicles, is not maintained, and is therefore a primitive route. This short spur used to access a now abandoned mine, and now this way is used by AZGFD to monitor bat colonies. Continuing south, Photopoint 22 was taken looking east down BLM Route 7857, which is maintained solely by the passage of vehicles. Although this primitive route was constructed, it is not currently being maintained, and for that reason is a way, not a road. BLM Route 7857 is substantially unnoticeable across the landscape. Photopoint 23 serves to further document that BLM Route 7857 is not being maintained, is revegetating, and receives no vehicular use at this location. BLM Route 7857 is a redundant route that is a great candidate for closure. Continuing south down the cherrystem, Photopoint 24 depicts an unnamed route that leads to an abandoned mine. As Photopoint 24 shows, this primitive route is not being maintained, and is thus a way, not a road. Photopoint 25 was taken looking south down the cherrystem (BLM Route 7775). Photopoint 26 shows an unnamed way that is not in the BLM route inventory data, and has no obvious purpose. As Photopoint 26 illustrates, this primitive route is not being maintained, is revegetating, and is kept open solely by the passage of vehicles; making it a way, not a road. Photopoint 27 displays an image of the radio towers on the top of the mountain at the end of BLM Route 7775 (wilderness inventory road). Returning to the Mount Perkins northern unit boundary at Photopoint 5, the powerline right-of-way continues to serve as the proposed LWC boundary to Photopoint 28.

#### **Eastern Boundary**

The BLM property line and various wilderness inventory roads make up the eastern Mount Perkins Proposed LWC boundary. Photopoint 28 marks the northeastern proposed LWC unit corner. Photopoint 28 was taken looking south down BLM Route 7767, which is a maintained wilderness inventory road and serves as the eastern LWC boundary. Heading south down BLM Route 7667, Photopoint 29 depicts BLM Route 7804 heading west. BLM Route 7804 shows no signs of mechanical maintenance (perennial vegetation growing in median), which means that it is a way, not a road as defined by BLM Manual 6310. Farther to the southwest, Photopoint 30 confirms that BLM Route 7804 is not being maintained. Photopoint 31 was taken looking southeast down BLM Route 7765, which shows no signs of construction, and is not being maintained; classifying it as a way. Returning to BLM Route 7804, Photopoint 32 substantiates a continued lack of maintenance along this way. BLM Route 7804 turns to the west at Photopoint 33. Photopoint 33 documents BLM Route 7775 at its northern terminus. As Photopoint 33 depicts, BLM Route 7775 was constructed, but displays no signs of maintenance and gets very low use. Due to a lack of mechanical maintenance, BLM Route 7775 is a

way, not a road. West of here, Photopoint 34 documents an unnamed primitive route that was not constructed, is maintained solely by the passage of vehicles, receives low use, and is not being maintained; making it a way, not a road. To the north, Photopoint 35 depicts a supposed route that the BLM route inventory data displays as a "Need to Verify" route. However, as Photopoint 35 illustrates, this is not a road or a way, but instead is a natural wash.

Returning to the Mount Perkins eastern proposed LWC unit boundary, Photopoint 36 is the next point of interest. Photopoint 36 depicts BLM Route 7773, which contains no obvious signs of construction, serves no purpose because it is a redundant route, has mature perennial shrubs growing in the median, and is clearly not being maintained; making it a way, not a road. Continuing southeast along the eastern LWC boundary, Photopoint 37 shows an old primitive route that has been reclaimed by nature, and is no longer a way. Photopoint 38 displays an image of BLM Route 7800, which was not constructed, serves no apparent purpose, is revegetating, and is not being maintained. Because of a lack of maintenance, BLM Route 7800 is a way, not a road. Farther to the southeast, Photopoint 39 shows another image of BLM Route 7767 (eastern LWC boundary). Photopoint 39 also marks the location where the proposed LWC unit boundary turns to the west and becomes BLM Route 7771, which is another wilderness inventory road. Photopoint 40 was taken looking southwest down BLM Route 7771, which has received a recent blade, and therefore qualifies as a LWC unit boundary. Photopoint 41 was taken where two primitive routes (BLM Route 7800 & an unnamed way) head north from BLM Route 7771 in one location. As Photopoint 41 displays, this primitive route is not being mechanically maintained, meaning that the two routes that are accessed from Photopoint 41 are both ways. From Photopoint 41, the BLM route inventory shows BLM Route 7771 continuing straight heading to the southwest, but this route does not exist on the ground. It is probable that whoever identified this supposed route was looking at a fence line in the aerial imagery, and incorrectly identified it as a route. From Photopoint 41, the Mount Perkins Proposed LWC unit boundary turns to the south and becomes BLM Route 7800, which is a maintained wilderness inventory road. This portion of BLM Route 7800 serves as the proposed LWC boundary until Photopoint 42. Photopoint 42 depicts an

unnamed route that has received a recent blade, and accesses Kemple Spring and a nearby mine. Because this route has been mechanically maintained it is a wilderness inventory road, and acts as the LWC boundary heading to the southwest until Waypoint 2.

At Waypoint 2, the unnamed wilderness inventory road ends, and the proposed LWC boundary cuts due south along the section line. At Waypoint 3, the Mount Perkins Proposed LWC unit boundary becomes the BLM property line until Waypoint 4. Between Waypoints 3 and 4, BLM Route 7855, a primitive unmaintained way (discussed previously and seen in Photopoint 19), enters the LWC unit. We encountered a rancher out on his dirt-bike using this primitive route, and he said that he regularly uses it as a thru-way. Although this way is regularly used for ranching, it is in bad shape with numerous rough sections, it is severely overgrown in places, and no evidence that it is being mechanically maintained. Traveling northwest up BLM Route 7855, Photopoint 43 displays an unnamed way with no evidence of construction or maintenance. This way is kept open solely by the passage of vehicles, and goes a short distance up to a viewpoint. Continuing north up BLM Route 7855, Photopoint 44 depicts

another unnamed way that was not constructed, is not being maintained, and is revegetating; making it a way, not a road as defined by BLM Manual 6310. Farther north, Photopoint 45 shows another faint primitive route with no signs of construction or maintenance that is revegetating. To the east from this junction, Photopoint 46 was taken looking east down BLM Route 7855. As Photopoint 46 illustrates, BLM Route 7855 displays no signs of mechanical maintenance, and is thus a way, not a road. Photopoint 47 depicts BLM Route 7855 to the north, and shows that this way continues to lack any signs of maintenance. From Photopoints 46 and 47, BLM Route 7857 (previously discussed with Photopoint 23) stems to the southwest. Photopoint 48 documents a primitive route branching from BLM Route 7857. As Photopoint 48 displays, this unnamed way is revegetated and definitely contains no evidence of maintenance; making it a primitive route, not a road.

Returning to the Mount Perkins Proposed LWC unit boundary, the BLM property line continues to serve as the proposed boundary until Waypoint 4. From Waypoint 4, the proposed LWC boundary cuts due south along the section line until intercepting BLM Route 7800 (maintained wilderness inventory road) which then serves as the boundary once again for a short distance to Waypoint 5. At Waypoint 5, the BLM property line becomes the LWC unit boundary until the property line intercepts with BLM Route 7800. At the west end of the private property, Photopoint 49 depicts an unnamed primitive route as it leaves the private land and enters BLM property. This way contains no evidence that it is being maintained, and there appears to no longer be a purpose for this primitive route as it was once used for piping water from Cottonwood Spring, but all pipes are currently in disrepair. Due to a lack of maintenance, the unnamed route seen in Photopoint 49 is a way, not a road. Photopoint 50 was taken outside of the proposed LWC unit looking northwest up BLM Route 7800 (LWC unit boundary), and shows that this is indeed a maintained wilderness inventory road. BLM Route 7800 serves as the proposed LWC unit boundary heading southeast until intercepting private land, which then becomes the unit boundary for several miles before the next wilderness inventory road.

Heading south from Waypoint 7 along the BLM property line (LWC boundary), Photopoint 51 is the next point of interest. Photopoint 51 was taken looking east up a primitive route that enters the proposed LWC unit. As Photopoint 51 documents, this primitive route is not being maintained, evidenced by the abundant vegetation within the way, and is kept open solely by the passage of vehicles. Furthermore, this way was once used to access a cow camp and water, but everything burned in the last wildfire, fallen into disrepair, and is not being used anymore. To the south, Photopoint 52 displays another image of BLM Route 7800 looking east. As the photo shows, this is section of BLM Route 7800 is a primitive way because it is not being maintained and is in disrepair. This way was once used for cattle watering, but has since been abandoned and the water line is out-of-service. Farther south, Photopoint 53 depicts another portion of BLM Route 7800. The BLM route inventory data displays BLM Route 7800 heading southwest down a dry wash. However, as Photopoint 53 documents, this is a natural wash with no evidence of vehicular use or maintenance. Photopoint 54 depicts an old unnamed primitive route that has since revegetated and been reclaimed. Photopoint 55 displays the image of another old primitive route that used to enter the proposed LWC unit, but this way was abandoned after the last wildfire in this area.

Continuing east, the BLM property line continues to serve as the Mount Perkins Proposed LWC boundary. Waypoint 8 marks the location of an unnamed, unmaintained way that enters the LWC unit. This way is not being mechanically maintained, and is thus a way, not a road. Heading south, the BLM property line continues to serve as the proposed LWC unit boundary until Waypoint 9. At Waypoint 9, BLM Route 7796 becomes the Mount Perkins Proposed LWC unit boundary. Farther to the southwest, Photopoint 56 displays an image of this maintained wilderness inventory road (BLM route 7796). From Waypoint 9, BLM Route 7796 is the proposed LWC boundary until it intercepts the BLM property line at Waypoint 10. The BLM property line serves as the proposed LWC boundary from Waypoint 10 to Waypoint 11. Between Waypoints 10 and 11, there is a primitive route that enters the LWC unit. This is an unmaintained way that does not meet the definition of a wilderness inventory road as defined by BLM Manual 6310. From Waypoint 11, the proposed LWC boundary becomes BLM Route 7796 again until Photopoint 57 (which displays an image of BLM Route 7796). Photopoint 57 depicts another section of BLM Route 7796, which is presently an unmaintained route, but contains a functioning waterline, which alternates between surface and buried, that originates from a private inholding used for ranching, and leads to tanks downhill. The section of BLM Route 7796 seen in Photopoint 57 serves as the proposed LWC unit boundary that leads to the private inholding. BLM Route 7796 is a proposed LWC unit boundary because it is likely to be maintained due to the waterline that follows its course. BLM Route 7763 serves as access to ranching infrastructure, shows signs of maintenance, and is a wilderness inventory road that forms a portion of the proposed LWC boundary. Using BLM Routes 7763 and 7796, and the property boundaries, the private inholding, its access routes, and their collective effects on naturalness have been excluded from the proposed LWC unit.

The next points of interest are located near the northwestern corner of the private inholding mentioned above. Photopoint 58 depicts an old unnamed way that no longer gets any vehicular use, is revegetating, and is clearly not maintained. Photopoint 59 was taken looking at a supposed route that the BLM identified in their route inventory. However, as Photopoint 59 shows, this is not a road or a way, but just a natural wash that cows walk in. Photopoint 60 was taken looking west down BLM Route 7796. As Photopoint 60 displays, this primitive route has perennial vegetation growing in its median indicating a lack of maintenance. This section of BLM Route 7796 appears to be kept open solely by the passage of vehicles; making it a way, but not a road.

Returning to BLM Route 7763, Photopoint 61 documents the condition of this primitive route beyond the cherrystem section. Photopoint 61 shows that this way has perennial vegetation in the median, and contains no evidence that it is being maintained. The mine that BLM Route 7763 leads to has been abandoned and is naturalizing. Photopoints 62-67 document the condition of some BLM route inventory "Need to Verify" routes and several other primitive ways located farther to the northwest up BLM Route 7763. All of these ways are either unmaintained, or reclaimed and naturalizing. Refer to each Photopoint for more details.

Returning to the Mount Perkins eastern LWC boundary at Photopoints 56 and 57; these Photopoints mark the location where the proposed LWC unit boundary changes from BLM Route

7763. This section of BLM Route 7763 is a maintained wilderness inventory road. Heading southeast down BLM Route 7763, Photopoint 68 is the next point of interest. Photopoint 68 depicts BLM Route 7761, which follows a fence line, is kept open solely by the passage of vehicles, has perennial vegetation growing in the median, and is not maintained; making it a way, not a road as defined by BLM Manual 6310. Farther east along BLM Route 7761, Photopoint 69 further documents that BLM Route 7761 is an unmaintained way. Photopoint 70 depicts another image of BLM Route 7761. As the photograph illustrates, BLM Route 7761 continues south as a primitive route with no signs of maintenance; this way is kept open solely by the passage of vehicles. Returning to the Mount Perkins eastern proposed LWC boundary, BLM Route 7763 continues to act as the LWC unit boundary road. Photopoint 71 depicts an image of BLM Route 7763, which continues to be a maintained wilderness inventory road.

#### Southern Boundary

The southern Mount Perkins Proposed LWC boundary is formed by various wilderness inventory roads, a mining exclusion, and the BLM property line. At Waypoint 12, the proposed LWC unit boundary turns to the west and becomes BLM Route 7946 or Cottonwood Road; a maintained wilderness inventory road. Heading west along Cottonwood Road, Photopoint 72 depicts an old primitive route displayed in the BLM route inventory data. Photopoint 72 shows that this old primitive route has grown in with vegetation and naturalized, and is no longer a way, or a road. This reclaimed way crosses Cottonwood Road three more times in the next 1.5 miles to the west. All of these reclaimed sections of old ways are the old course that Cottonwood Road used to take, but are now abandoned and in a similar condition as shown in Photopoint 72. Farther to the west, Photopoint 73 depicts an image of BLM Route 7761 near where it meets Cottonwood Road. Photopoint 73 shows that this end of BLM Route 7761 was not constructed, is not receiving maintenance, and is just a way. Just to the south of Photopoint 73, a short spur, which is part of the "old" Cottonwood road mentioned above, cuts up to BLM Route 7761. This short spur route appears to get some maintenance for a short ways because it is part of a large maintained clearing adjacent to the cattle guard on Cottonwood Road. This short spur route is unneeded because it is redundant and serves no purpose, and has not been excluded from the proposed LWC unit. Crossing over the cattle guard and continuing west on Cottonwood Road,

Photopoint 74 is the next point of interest. Photopoint 74 depicts an unnamed road that has received recent maintenance and serves as the LWC unit boundary for a short distance. This wilderness inventory road is used by 2-wheel drive passenger vehicles to access a scenic viewpoint overlooking the Colorado River to the west. This unnamed wilderness inventory road serves as the proposed LWC boundary until it intersects with Cottonwood Road just a short distance to the west. Cottonwood Road then

until it intersects with Cottonwood Road just a short distance to the west. Cottonwood Road then becomes the Mount Perkins Proposed LWC unit boundary once again.

Continuing down the hill to the northwest on Cottonwood Road (LWC unit boundary) Photopoint 75 marks the location where the LWC unit boundary turns to the north and becomes BLM Route 7853. Photopoint 75 displays an image of BLM Route 7853, which is a wilderness inventory road that serves as mine access and contains old evidence of mechanical maintenance. BLM Route 7853 is the Mount

Perkins Proposed LWC unit boundary heading north. Photopoint 76 depicts an unnamed way that the BLM route inventory has labeled as a "Need to Verify" route that leads to an abandoned prospecting area. As Photopoint 76 shows, this primitive route is revegetating, is not being maintained, and contained no evidence of vehicular use at the time of inventory. Continuing east along BLM Route 7853 (LWC boundary), Photopoint 77 is the next point of interest and was taken outside the proposed LWC unit boundary. Photopoint 77 displays an image of the abandoned Dixie Queen Mine (Waypoint 13). This mine has been excluded from the Mount Perkins Proposed LWC unit because of the scenic impacts to naturalness qualities. As seen in Photopoint 77, there is a convenient ridge surrounding the worst of the mining impacts that has been used as the proposed LWC boundary in this area. The mine impacts are entirely contained on the slope below the ridge, which conceals those impacts from the LWC unit interior.

BLM Route 7853 continues to serve as the Mount Perkins Proposed LWC unit boundary continuing to the northwest. Photopoint 78 shows another picture of BLM Route 7853, which is still a maintained wilderness inventory road. Photopoint 79 depicts an unnamed way heading east into the LWC unit. This primitive route has perennial vegetation growing in the median and shows no signs of maintenance. Photopoint 80 further documents a lack of maintenance on this unnamed way that leads to an abandoned mine. Photopoint 81 pictures an old mine contained within the LWC unit that is naturalizing. This is a good example of how the old mining looks now that disturbances have had time to naturalize. Photopoint 81 depicts some mine tailings that blend into the landscape exceptionally well, and are therefore substantially unnoticeable to the average visitor. The primitive route (Photopoints 79 and 80), leading to the abandoned mine, is only 20 feet away and cannot be detected in Photopoint 81. Continuing along the proposed LWC unit boundary, Photopoint 82 was taken looking east up an unnamed, unmaintained way that goes just a short distance into the LWC unit before ending with no apparent purpose. Waypoint 14 marks the location of a restored mine site that has been excluded from the proposed LWC unit. BLM Route 7853 (unit boundary) goes to the west of the reclaimed mine (Waypoint 14), while most of the vehicular traffic goes to the east of the mine on an unnamed maintained road that serves as the LWC boundary for just a short distance until intercepting BLM Route 7853 once again. BLM Route 7853 continues to be the proposed Mount Perkins LWC unit boundary continuing north until Waypoint 15. At Waypoint 15, the unit boundary becomes an unnamed maintained wilderness inventory road and continues to the north.

Photopoint 83 was taken looking at an old mine located just within the Mount Perkins Proposed LWC unit. As the photograph illustrates, this mine blends in well with the surrounding landscape, and will naturalize slowly over time. For these reasons, this old mine is included in the proposed LWC unit. Continuing north, Photopoint 84 displays an image of an unnamed way that is not maintained, is revegetating, and has no apparent purpose for its existence. Farther north, Photopoint 85 shows another primitive route enter the proposed LWC unit that leads to a small abandoned mine. As the photo illustrates, although this way was constructed, it is not being maintained, and is not a road as defined by BLM Manual 6310.

At Waypoint 16, the proposed unit boundary leaves BLM Route 7853 and begins to follow a series of ridges and saddles with the explicit purpose of excluding the impacts of historic mineral prospecting, abandoned mined areas, and active mining operations. Specifically, these are the heavily disturbed areas associated with the Golden Door Mine, Klondyke Mine, and a network of roads, routes, and tailings that overlap several periods of mining activity. The proposed boundary follows a ridge northnortheasterly from Waypoint 16 to the summit of a hill that is the highest point in Section 28. From here, the proposed boundary follows an abandoned prospecting route that is aligned on a ridge that leads to the northeast, where it drops into a wash, meets another abandoned prospecting route, and then heads north-northwesterly, climbing a ridge to the highest point in Section 21 (Point 3845'). From this summit, the boundary generally runs to the west, following an arching ridge down into a wash in the northeastern quadrant of Section 20. Here, the boundary crosses a lightly used and badly eroded unmaintained way at Photopoint 86 that was constructed to access the excluded areas of heavy impact. From this point, the proposed boundary follows a ridge up to the highest point of Section 20, then down the southwesterly ridge that drops into a wash and meets BLM Route 7878. From this route, the proposed boundary curves to the southwest where it meets and follows the border of Sections 20 and 29 at Waypoint 17. From Waypoint 17, the entirety of Section 29 is excluded along the north-south border with Section 30, and the boundary is adjusted slightly to exclude a wilderness inventory road, BLM Route 7759, that is shown in Photopoint 87.

The BLM property line continues to serve as the proposed LWC boundary. At Waypoint 18, a primitive route (BLM Route 7759) that receives no apparent mechanical maintenance enters the proposed LWC unit. This primitive route is used as an alternate way to get around the nearby mining impacts. This way is also used to access some AZGFD wildlife water catchments (Photopoints 97 & 104) on the west side of the Black Mountains. Photopoints 88-106 display photographs of unmaintained primitive routes that appear to get low vehicular use, as well as routes that the BLM has identified in their route inventory data, but that do not actually exist on the ground, or are just natural washes. See individual Photopoints for more details. From Waypoint 18, the BLM property line with private land forms the remainder of the southern proposed LWC boundary.

#### Western Boundary

The entire western Mount Perkins Proposed LWC unit boundary is the BLM property line with the adjacent National Recreation Area to the west. There are no roads or primitive routes that enter the western proposed LWC boundary for its entire length all the way back to Waypoint 1.

# Data Tables & Photographs to accompany Maps and the Detailed Boundary & Routes Description

| Attributes    |                                |  |
|---------------|--------------------------------|--|
| Title         | Photopoint 001                 |  |
| Unit name     | Mount Perkins                  |  |
| Route name    | Not Named                      |  |
| Determination | Way                            |  |
| Maintenance   | None                           |  |
| Feature       | Typical condition of Route/Way |  |





| Attributes    |                |  |
|---------------|----------------|--|
| Title         | Photopoint 002 |  |
| Unit name     | Mount Perkins  |  |
| Route name    | Not Named      |  |
| Determination | Reclaimed      |  |
| Maintenance   | None           |  |
| Feature       | Revegetated    |  |





| Attributes    |                |  |
|---------------|----------------|--|
| Title         | Photopoint 003 |  |
| Unit name     | Mount Perkins  |  |
| Route name    | BLM Route 7814 |  |
| Determination | Road           |  |
| Maintenance   | Recent blade   |  |
| Feature       | Powerline      |  |





| Attributes    |                                |  |
|---------------|--------------------------------|--|
| Title         | Photopoint 004                 |  |
| Unit name     | Mount Perkins                  |  |
| Route name    | BLM Route 7880                 |  |
| Determination | Way                            |  |
| Maintenance   | None                           |  |
| Feature       | Typical condition of Route/Way |  |





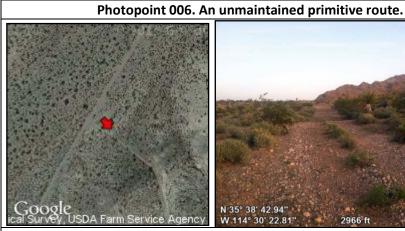


| Attributes    |                  |  |
|---------------|------------------|--|
| Title         | Photopoint 005   |  |
| Unit name     | Mount Perkins    |  |
| Route name    | BLM Route 7765   |  |
| Determination | Road             |  |
| Maintenance   | Likely if needed |  |
| Feature       | Junction of      |  |
|               | Routes/Ways      |  |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 006                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |





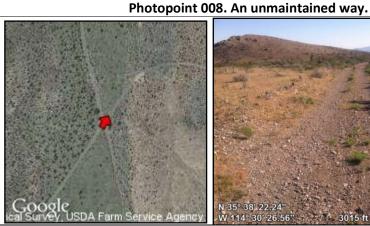
| Attributes    |                                |  |
|---------------|--------------------------------|--|
| Title         | Photopoint 007                 |  |
| Unit name     | Mount Perkins                  |  |
| Route name    | Not Named                      |  |
| Determination | Way                            |  |
| Maintenance   | None                           |  |
| Feature       | Typical condition of Route/Way |  |







| Attributes    |                                |  |
|---------------|--------------------------------|--|
| Title         | Photopoint 008                 |  |
| Unit name     | Mount Perkins                  |  |
| Route name    | BLM Route 7804                 |  |
| Determination | Way                            |  |
| Maintenance   | None                           |  |
| Feature       | Typical condition of Route/Way |  |





| Attributes    |                      |  |
|---------------|----------------------|--|
| Title         | Photopoint 009       |  |
| Unit name     | Mount Perkins        |  |
| Route name    | BLM Route 7859       |  |
| Determination | Road                 |  |
| Maintenance   | Likely if needed     |  |
| Feature       | Typical condition of |  |
|               | Route/Way            |  |





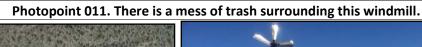
| Attributes    |                                |  |
|---------------|--------------------------------|--|
| Title         | Photopoint 010                 |  |
| Unit name     | Mount Perkins                  |  |
| Route name    | BLM Route 7804                 |  |
| Determination | Way                            |  |
| Maintenance   | None                           |  |
| Feature       | Typical condition of Route/Way |  |







| Attributes    |                |  |
|---------------|----------------|--|
| Title         | Photopoint 011 |  |
| Unit name     | Mount Perkins  |  |
| Route name    | BLM Route 7804 |  |
| Determination | Way            |  |
| Maintenance   | None           |  |
| Feature       | Windmill       |  |







| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 012 |
| Unit name     | Mount Perkins  |
| Route name    | BLM Route 7804 |
| Determination | Reclaimed      |
| Maintenance   | None           |
| Feature       | Revegetated    |





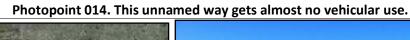
| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 013 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Reclaimed      |
| Maintenance   | None           |
| Feature       | Revegetating   |







| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 014 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Reclaimed      |
| Maintenance   | None           |
| Feature       | Revegetated    |







| Attributes    |                     |
|---------------|---------------------|
| Title         | Photopoint 015      |
| Unit name     | Mount Perkins       |
| Route name    | BLM Route 7775      |
| Determination | Not a road or a way |
| Maintenance   | None                |
| Feature       | Natural wash        |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 016                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7859                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |







| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 017                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7775                 |
| Determination | Road                           |
| Maintenance   | Likely if needed               |
| Feature       | Typical condition of Route/Way |

Photopoint 017. This wilderness inventory road is likely to be maintained.

Photopoint 018. This is not a road or way.





| Attributes    |                     |
|---------------|---------------------|
| Title         | Photopoint 018      |
| Unit name     | Mount Perkins       |
| Route name    | Not Named           |
| Determination | Not a road or a way |
| Maintenance   | None                |
| Feature       | Natural vegetation  |





| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 019 |
| Unit name     | Mount Perkins  |
| Route name    | BLM Route 7855 |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Revegetating   |





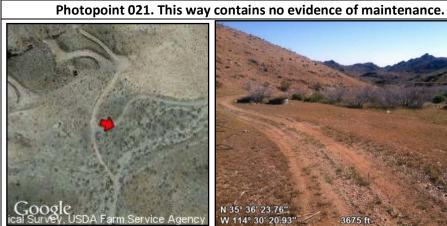


| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 020                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7859                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |



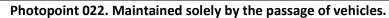


| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 021                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 022                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7857                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |







| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 023 |
| Unit name     | Mount Perkins  |
| Route name    | BLM Route 7857 |
| Determination | Reclaimed      |
| Maintenance   | None           |
| Feature       | Revegetated    |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 024                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 025                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7775                 |
| Determination | Road                           |
| Maintenance   | Likely if needed               |
| Feature       | Typical condition of Route/Way |







| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 026 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Revegetated    |



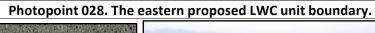


| Attributes    |                       |
|---------------|-----------------------|
| Title         | Photopoint 027        |
| Unit name     | Mount Perkins         |
| Route name    | End of route at North |
|               | Tower                 |
| Determination | ROW - Wilderness      |
|               | Inventory Road        |
| Maintenance   | Old evidence          |
| Feature       | North Tower Site      |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 028                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7767                 |
| Determination | Road                           |
| Maintenance   | Recent blade                   |
| Feature       | Typical condition of Route/Way |







| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 029                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7804                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |







| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 030 |
| Unit name     | Mount Perkins  |
| Route name    | BLM Route 7804 |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Low use        |





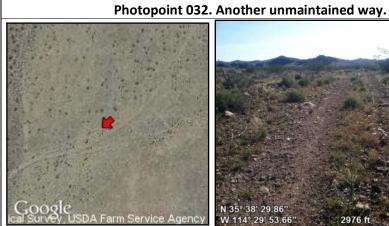
| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 031                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7765                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |





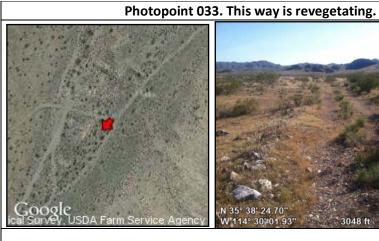


| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 032                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7804                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |





| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 033 |
| Unit name     | Mount Perkins  |
| Route name    | BLM Route 7775 |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Revegetating   |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 034                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |



Photopoint 036. Another revegetating way with low use.





| Attributes    |                     |
|---------------|---------------------|
| Title         | Photopoint 035      |
| Unit name     | Mount Perkins       |
| Route name    | Not Named           |
| Determination | Not a road or a way |
| Maintenance   | None                |
| Feature       | Just a wash         |





| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 036 |
| Unit name     | Mount Perkins  |
| Route name    | BLM Route 7773 |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Revegetating   |





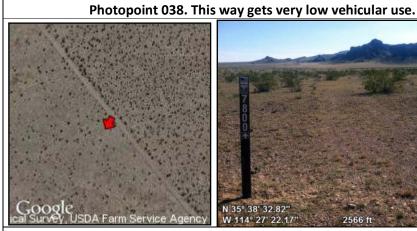
| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 037 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Reclaimed      |
| Maintenance   | None           |
| Feature       | Revegetated    |





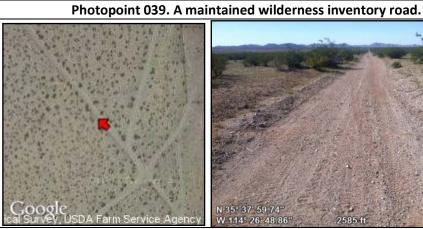


| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 038 |
| Unit name     | Mount Perkins  |
| Route name    | BLM Route 7800 |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Revegetating   |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 039                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM route 7767                 |
| Determination | Road                           |
| Maintenance   | Recent blade                   |
| Feature       | Typical condition of Route/Way |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 040                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM route 7771                 |
| Determination | Road                           |
| Maintenance   | Recent blade                   |
| Feature       | Typical condition of Route/Way |







| Attributes    |                      |
|---------------|----------------------|
| Title         | Photopoint 041       |
| Unit name     | Mount Perkins        |
| Route name    | BLM Route 7800 &     |
|               | Unnamed Way          |
| Determination | Ways                 |
| Maintenance   | None                 |
| Feature       | Typical condition of |
|               | Route/Way            |





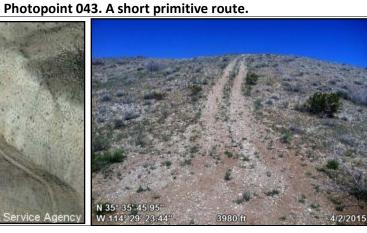
| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 042                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Road                           |
| Maintenance   | Recent blade                   |
| Feature       | Typical condition of Route/Way |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 043                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |





**Attributes** Photopoint 044 Title Unit name **Mount Perkins** Route name **Not Named** Determination Way None Maintenance Revegetating Feature

Photopoint 044. This way was not constructed and shows no signs of maintenance.





| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 045 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Revegetated    |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 046                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7855                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |







| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 047                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7855                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |







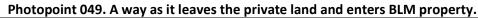
| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 048 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Revegetated    |

Photopoint 048. This primitive route has grown in with vegetation.





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 049                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |







| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 050                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7800                 |
| Determination | Road                           |
| Maintenance   | Recent blade                   |
| Feature       | Typical condition of Route/Way |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 051                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7800                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 052                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7800                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |

Photopoint 052. Clearly not a maintained route. Take note of abandoned waterline strewn across the way that was left for trash.





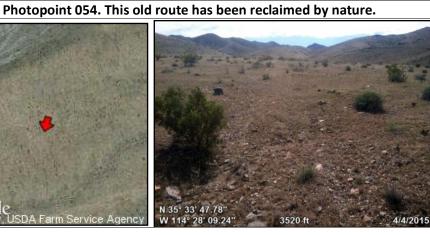
| Attributes    |                     |
|---------------|---------------------|
| Title         | Photopoint 053      |
| Unit name     | Mount Perkins       |
| Route name    | BLM Route 7800      |
| Determination | Not a road or a way |
| Maintenance   | None                |
| Feature       | Natural wash        |





| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 054 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Reclaimed      |
| Maintenance   | None           |
| Feature       | Revegetated    |





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| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 055 |
| Unit name     | Mount Perkins  |
| Route name    | Not named      |
| Determination | Reclaimed      |
| Maintenance   | None           |
| Feature       | Revegetated    |

Photopoint 055. This way was abandoned after the last wildfire in the area, and has been reclaimed by nature.





Title Photopoint 056
Unit name Mount Perkins
Route name BLM Route 7796
Determination Road
Maintenance None
Feature Typical condition of Route/Way

Photopoint 056. This road makes up a portion of the eastern proposed LWC unit boundary.





Title Photopoint 057
Unit name Mount Perkins
Route name BLM Route 7796
Determination Waterline
Maintenance None
Feature Typical condition of Route/Way

Photopoint 057. This waterline and the associated route is likely to be maintained.





| Attributes    |                     |
|---------------|---------------------|
| Title         | Photopoint 058      |
| Unit name     | Mount Perkins       |
| Route name    | Not Named           |
| Determination | Not a road or a way |
| Maintenance   | None                |
| Feature       | Revegetated         |







| Attributes    |                     |
|---------------|---------------------|
| Title         | Photopoint 059      |
| Unit name     | Mount Perkins       |
| Route name    | Not Named           |
| Determination | Not a road or a way |
| Maintenance   | None                |
| Feature       | Just a wash         |





**Attributes** Title Photopoint 060 Unit name **Mount Perkins** Route name BLM route 7796 Determination Way Maintenance None Typical condition of Feature Route/Way

Photopoint 060. This way appears to be kept open solely by the passage of vehicles.





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 061                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7763                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |

Photopoint 061. This photo documents a lack of maintenance beyond where the cherrystem ends.





| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 062 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Reclaimed      |
| Maintenance   | None           |
| Feature       | Revegetated    |





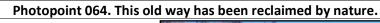
| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 063                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |

Photopoint 063. A primitive route lacking signs of maintenance.





| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 064 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Reclaimed      |
| Maintenance   | None           |
| Feature       | Revegetated    |







| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 065 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Revegetated    |



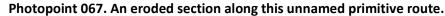


| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 066                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |





| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 067 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Erosion        |







Title Photopoint 068
Unit name Mount Perkins
Route name BLM Route 7761
Determination Way
Maintenance None
Feature Typical condition of Route/Way

Photopoint 068. This way follows a fenceline and is kept open solely by the passage of vehicles.





Title Photopoint 069
Unit name Mount Perkins
Route name BLM Route 7761
Determination Way
Maintenance None
Feature Typical condition of Route/Way

Photopoint 069. This photo further documents that BLM Route 7761 is an unmaintained way.





| Attributes    |                      |
|---------------|----------------------|
| Title         | Photopoint 070       |
| Unit name     | Mount Perkins        |
| Route name    | BLM Route 7761       |
| Determination | Way                  |
| Maintenance   | None past entrance   |
|               | at Cottonwood Road   |
| Feature       | Typical condition of |
|               | Route/Way            |

#### Photopoint 070. This primitive route contains no evidence that it is being mechanically maintained.





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 071                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7763                 |
| Determination | Road                           |
| Maintenance   | Old evidence                   |
| Feature       | Typical condition of Route/Way |





**Attributes** Title Photopoint 072 Unit name **Mount Perkins** Route name **Not Named** Determination Reclaimed Maintenance None **Feature** Revegetated

Photopoint 072. This old route has revegetated and been reclaimed by nature.





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 073                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7761                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |







**Attributes** Photopoint 074 Title **Mount Perkins** Unit name Route name **Not Named** Determination Road Recent blade Maintenance Typical condition of Feature Route/Way

Photopoint 074. This unnamed road serves as the LWC unit boundary for a short distance.





| Attributes    |                      |
|---------------|----------------------|
| Title         | Photopoint 075       |
| Unit name     | Mount Perkins        |
| Route name    | BLM Route 7853       |
| Determination | Road                 |
| Maintenance   | Old evidence         |
| Feature       | Typical condition of |
|               | Route/Way            |





| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 076 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Revegetating   |







Title Photopoint 077
Unit name Mount Perkins
Route name Dixie Queen Mine (abandoned)
Determination NA
Maintenance NA
Feature Abandoned mine

Photopoint 077. The abandoned Dixie Queen Mine which has been excluded from the proposed LWC unit.





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 078                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7853                 |
| Determination | Road                           |
| Maintenance   | Recent blade                   |
| Feature       | Typical condition of Route/Way |

Coarle



| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 079                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | Old evidence                   |
| Feature       | Typical condition of Route/Way |

Photopoint 079. Perennial vegetation in median indicates a lack of mechanical maintenance along this primtive route.





**Attributes** Title Photopoint 080 Unit name **Mount Perkins** Route name **Not Named** Determination Way Maintenance None Typical condition of Feature Route/Way

Photopoint 080. Further documentation of a lack of maintenance on this unnamed way that leads to an abandoned mine.





| Attributes    |                             |  |
|---------------|-----------------------------|--|
| Title         | Photopoint 081              |  |
| Unit name     | Mount Perkins               |  |
| Route name    | N/A                         |  |
| Determination | N/A                         |  |
| Maintenance   | N/A                         |  |
| Feature       | Naturalizing abandoned mine |  |





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 082                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |

Photopoint 082. Looking east up an unmaintained way with no apparent purpose.





| Attributes    |                           |
|---------------|---------------------------|
| Title         | Photopoint 083            |
| Unit name     | Mount Perkins             |
| Route name    | N/A                       |
| Determination | N/A                       |
| Maintenance   | N/A                       |
| Feature       | Low visual impact of mine |

Photopoint 083. This abandoned mine is naturalizing and revegetating; making it blend into the surrounding landscape exceptioinally well.





| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 084 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Revegetating   |

Photopoint 084. An unmaintained way with no purpose.





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 085                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |







| Attributes    |                |
|---------------|----------------|
| Title         | Photopoint 086 |
| Unit name     | Mount Perkins  |
| Route name    | Not Named      |
| Determination | Way            |
| Maintenance   | None           |
| Feature       | Erosion        |





**Attributes** Title Photopoint 087 Unit name **Mount Perkins** Route name BLM Route 7759 Determination Road Recent blade Maintenance Typical condition of Feature Route/Way

Photopoint 087. A wilderness inventory road that serves as part of the proposed LWC unit boundary.





| Attributes    |                     |
|---------------|---------------------|
| Title         | Photopoint 088      |
| Unit name     | Mount Perkins       |
| Route name    | Not Named           |
| Determination | Not a road or a way |
| Maintenance   | None                |
| Feature       | Just a wash         |

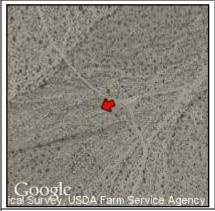






Title Photopoint 089
Unit name Mount Perkins
Route name BLM Route 7878
Determination Way
Maintenance None
Feature Typical condition of Route/Way

Photopoint 089. This unmaintained way crosses private land with no infrastructure or facilities & then crosses back into BLM with no infrastructure & then fades in a wash. Low vehicular use is evident.





Attributes
Title Photopoint 090
Unit name Mount Perkins
Route name BLM Route 7878
Determination Way
Maintenance None
Feature Typical condition of Route/Way

Photopoint 090. This old mine access is not being maintained which is evidenced by the perennial vegetation growing in the median.





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 091                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |







| Attributes    |                     |
|---------------|---------------------|
| Title         | Photopoint 092      |
| Unit name     | Mount Perkins       |
| Route name    | Not Named           |
| Determination | Not a road or a way |
| Maintenance   | None                |
| Feature       | Dry wash            |

Photopoint 092. This natural dry wash shows no signs of vehicular use.





Title Photopoint 093
Unit name Mount Perkins
Route name Not Named
Determination Way
Maintenance None
Feature Typical condition of Route/Way

Photopoint 093. This way is revegetating and eroding, and is kept open solely by the passage of vehicles.





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 094                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7759                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |







| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 095                 |
| Unit name     | Mount Perkins                  |
| Route name    | Not Named                      |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |





**Attributes** Title Photopoint 096 Unit name **Mount Perkins Not Named** Route name Way Determination Maintenance None Typical condition of Feature Route/Way

Photopoint 096. Perennial vegetation growing in median indiactes a long-term lack of mechanical maintenance.





| Attributes    |                               |
|---------------|-------------------------------|
| Title         | Photopoint 097                |
| Unit name     | Mount Perkins                 |
| Route name    | Not named                     |
| Determination | Way                           |
| Maintenance   | None                          |
| Feature       | Wildlife Water<br>Enhancement |

Photopoint 097. Water catchment and county weather alert antenna blend in remarkably well with the natural landscape.





| Attributes    |                                |
|---------------|--------------------------------|
| Title         | Photopoint 098                 |
| Unit name     | Mount Perkins                  |
| Route name    | BLM Route 7759                 |
| Determination | Way                            |
| Maintenance   | None                           |
| Feature       | Typical condition of Route/Way |





| Attributes    |                     |
|---------------|---------------------|
| Title         | Photopoint 099      |
| Unit name     | Mount Perkins       |
| Route name    | Not Named           |
| Determination | Not a road or a way |
| Maintenance   | N/A                 |
| Feature       | Natural wash        |





| Attributes    |                                |  |
|---------------|--------------------------------|--|
| Title         | Photopoint 100                 |  |
| Unit name     | Mount Perkins                  |  |
| Route name    | BLM Route 7759                 |  |
| Determination | Way                            |  |
| Maintenance   | None                           |  |
| Feature       | Typical condition of Route/Way |  |

# Photopoint 100. This unmaintained way leads to an AZGFD water catchment.





| Attributes    |                                |  |
|---------------|--------------------------------|--|
| Title         | Photopoint 101                 |  |
| Unit name     | Mount Perkins                  |  |
| Route name    | Not Named                      |  |
| Determination | Way                            |  |
| Maintenance   | None                           |  |
| Feature       | Typical condition of Route/Way |  |







| Attributes    |                     |  |
|---------------|---------------------|--|
| Title         | Photopoint 102      |  |
| Unit name     | Mount Perkins       |  |
| Route name    | Not Named           |  |
| Determination | Not a road or a way |  |
| Maintenance   | None                |  |
| Feature       | Just a wash         |  |





| Attributes    |                                |  |
|---------------|--------------------------------|--|
| Title         | Photopoint 103                 |  |
| Unit name     | Mount Perkins                  |  |
| Route name    | Not Named                      |  |
| Determination | Way                            |  |
| Maintenance   | None                           |  |
| Feature       | Typical condition of Route/Way |  |







**Attributes** Title Photopoint 104 **Mount Perkins** Unit name N/A Route name Determination N/A None Maintenance Wildlife Water **Enhancement hardly** visible among the **Feature** majesty of the surrounding peaks

Photopoint 104. This photo was taken at the end of the unnamed way that leads to an AZGFD water catchment.





Title Photopoint 105
Unit name Mount Perkins
Route name Not Named
Determination Way
Maintenance None
Feature Typical condition of Route/Way

Photopoint 105. This unmaintained primitive route is kept open solely by the passage of vehicles.





| Attributes    |                                |  |
|---------------|--------------------------------|--|
| Title         | Photopoint 106                 |  |
| Unit name     | Mount Perkins                  |  |
| Route name    | BLM Route 7759                 |  |
| Determination | Way                            |  |
| Maintenance   | None                           |  |
| Feature       | Typical condition of Route/Way |  |



