

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



ARIZONA WILDERNESS COALITION

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Cover Photo: Javelina Peak, viewed from Point S1. 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.¹

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 6310.²

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

¹Memorandum 2011-154 is available online at:

² 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.

METHODS: The research approach to developing this citizens' proposal

The information presented in this report was developed systematically to ensure a comprehensive and accurate description of the proposed LWC that fulfills the citizens' proposal requirements of Manual 6310. Our intent has been to effectively combine the analytical power of technology with the equally important elements of qualitative observation, to produce a suite of products that can be used to facilitate the protection of a variety of lands with wilderness characteristics across the Safford Resource Area, meeting the conservation objectives of Arizona Wilderness Coalition *and* the legal obligation for the BLM to "preserve and protect certain public lands in their natural condition".

STEP 1: GIS ROADLESS ANALYSIS

The initial exercise in our inventory was to complete a geospatial analysis of the study area to identify potential roadless areas using a combination of Qgis, ESRI ArcGis, and Google Earth Pro. The BLM's Route Inventory dataset was gueried for keywords that indicated that a route may be maintained, such as "gravel-surfaced", "2WD use", "Recent grading", and numerous other terms. Several rounds of this process were verified over color aerial imagery to assess the quality of the output. During this step, some errors in the dataset were corrected, such as incomplete line features or very inaccurate digitization. Additionally, we performed a visual assessment of aerial imagery for roads that appeared obviously maintained, and added an attribute column to mark these features as such. We also acquired railroad data, US Census Lidar data for Primary & Secondary Roads, Interstate highway data, and county-maintained roads data from Cochise County. In addition, we digitized natural gas pipeline corridors, telephone and power lines, and the proposed route for the SunZia transmission line. Each feature type was buffered by distances ranging from 10 feet for dirt roads, to 50 feet for interstates and powerlines, and the results were dissolved and unioned to develop one master feature dataset that represented probable wilderness inventory roads and rights-of-way corridors. These data were then used to clip BLM's Surface Management dataset into contiguous blocks of BLM land. Areas less than 5,000 acres were then deleted (unless contiguous to wilderness, WSA, or Proposed Wilderness), and the resultant output was a dataset of 52 units of BLM lands that were probable roadless areas.

STEP 2: FIELD INVENTORY PRIORITIZATION

Prior to visiting any sites on the ground, we assessed each initial roadless area polygon to determine where our resources would be most effectively deployed. Our objectives were to maximize field inventory efforts on the areas that we estimated would possess the most outstanding wilderness values, while also covering a broad geographic sample of the study area. Our determinations were informed by EIS documents, past wilderness inventory reports by BLM and AWC, research by The Nature Conservancy and the Sky Island Alliance, and geospatial data we acquired from BLM, US Forest Service, academic institutions, and the Arizona Game and Fish Department, including the Heritage Database. It is important to make clear that the units we decided not to inventory probably possess wilderness characteristics, but given available resources, we could not visit every unit. In addition to the units we are proposing as LWC's, we are also providing recommendations for areas we have identified as "Potential LWC's". Those units should still be inventoried for wilderness characteristics.

STEP 3: FIELD PLANNING

Trips to the field were strategic, focused efforts. For each unit, we developed a list of field inventory points that we endeavored to visit either by foot or vehicle. By using the BLM Route Inventory Dataset, the BLM Range Improvements dataset, the USGS Springs dataset, the Arizona Land Resources Information System Mines dataset, and USGS Topographic Maps, we identified potential impacts to naturalness and areas of potential supplemental value. These datasets were exhaustively examined on Google Earth to validate feature locations. Additionally, other inventory features were identified on the aerial imagery. Once the field inventory points were identified, they were loaded into MotionX GPS HD for iPad. Also, we loaded high-resolution color aerial imagery for our target units and the surrounding area, to assist in navigation, identification of landscape features, and location of hard to detect features. Finally, standard logistical planning steps were completed to ensure that our team would enjoy safe and efficient days in the field.

STEP 4: FIELD INVENTORY

From January to March, 2016, and again in September, 2016, our team dedicated more than 800 hours to inventorying lands with wilderness characteristics. Our objectives were: 1) to refine unit boundaries to confirmed wilderness inventory roads and impacts to naturalness; 2) to identify and document primitive routes, ways, and trails; 3) locate and document minor impacts to naturalness that are permitted within LWC's; 4) identify and document opportunities for solitude and primitive recreation; and 5) discover and document supplemental values where they exist. The primary tool for documentation was GeoJot+ for iPhone, a data collection app that allows the user to develop dropdown data tables that are attached to geotagged .jpeg digital photographs. In making determinations whether a route was a road versus a way, we returned to the legislative definition of a road (discussed earlier), closely assessed the history of maintenance, and considered the purpose (or lack thereof) of the route, the level of use, its connectivity, and other aspects. We are confident that upon verification, our determinations meet the intent of Manual 6310.

STEP 5: FINAL ASSESSMENT, MAPPING, AND DATA COMPILATION

After a field trip, data were loaded into GeoJot + Core for PC, where edits were made where necessary, and final determinations for unit boundaries were made. A range of products were developed from this application: 1) the photopoint data in Section 5 of this report, complete with tables and geotaggs; 2) .kml files for Google Earth to visualize the photopoints across the landscape; and 3) a .kml file of scenic panoramas of the units, showcasing the immense beauty and wildness of our final unit proposals. It is the intent of AWC to share these interactive products with BLM to facilitate in the review of our proposals and to support our best efforts to put forth fair proposals in full transparency. Finally, edits were made to unit polygons in GIS, supplemental information was further explored, maps were developed, and the components of this report were produced. Arizona Wilderness Coalition is proud to share with the BLM this citizens' proposal report and accompanying GIS data, the product of an intensive and science-based conservation process that furthers our collective goal to "preserve and protect certain public lands in their natural condition".

Section 1:

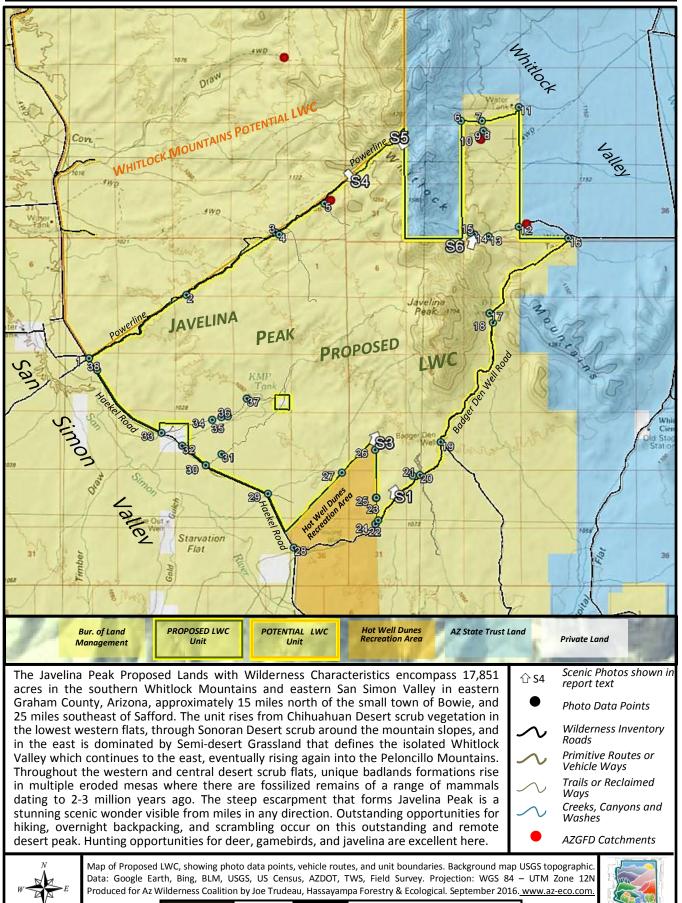
Overview of the Proposed Lands with Wilderness Characteristics



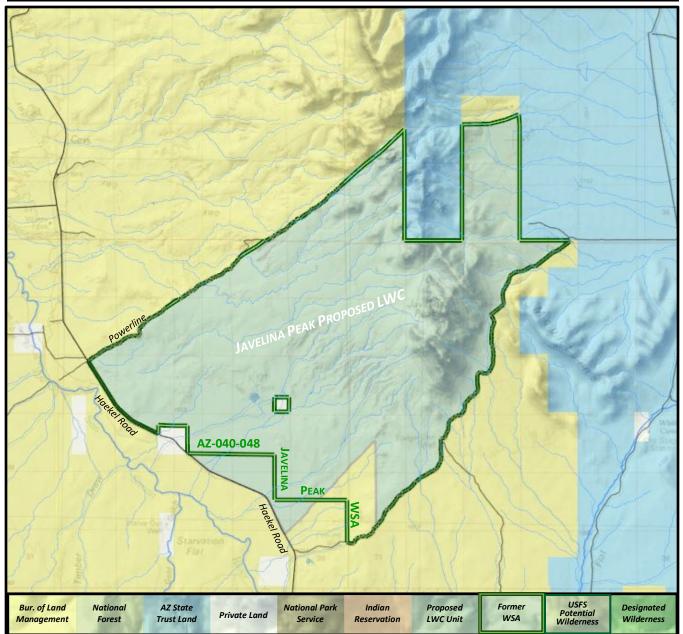
Javelina Peak rises more than 2300 feet above the San Simon River in a dramatic southeast-facing escarpment. The southern terminus of the Whitlock Mountains, the peak is a regional landmark, distinctive in its profile from many angles, and it's the wild centerpiece of our nearly 18,000 acre proposed Lands with Wilderness Characteristics. The Whitlock Mountains serve as the northeastern boundary of the San Simon Valley, a broad and desolate plain of creosote, blowing sand, and eroded gullies. Windblown sands, exposed following decades of overgrazing, collect at the base of Javelina Peak in stunning dune formations.

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Unit Introduction: Overview map showing unit location & labeled boundaries



Previous Wilderness Inventories: Map & discussion of former WSA's or inventory units



The Javelina Peak portion of the Whitlock Mountains has long been recognized for its wilderness characteristics. During the 1978-1980 initial wilderness inventory process, the BLM identified essentially the same unit that we are proposing here, except that the southern portion of the unit at that time was in private ownership. In 1980, the BLM established the Javelina Peak Wilderness Study Area (WSA), encompassing about 17,870 acres. In 1987 Arizona Wilderness Coalition recommended 18,853 acres for Wilderness designation, matching the BLM's All Wilderness option in their 1987 EIS analysis. The All Wilderness option laid out in the 1987 EIS differs from what AWC is currently proposing as an LWC in the following ways: 1) we have not provided a cherrystem from Haekel Road leading to KMP tank because this primitive route is not a maintained wilderness inventory road; 2) Haekel Road serves as almost the entire southwestern unit boundary, whereas the WSA boundary followed what was then the BLM property line; and 3) the Hot Well Dunes Recreation Area is completely excluded from the proposed LWC unit. The BLM did exclude a portion of this area from their Wilderness proposal, but since that time, the Recreation Area has been established and a managed area has been defined. Ultimately, the BLM chose the No Wilderness (No Action) option for the Javelina Peak Wilderness Study Area, and the WSA was released back to multiple use management. Their reasoning for this apparently was that "...unauthorized ORV use would temporarily impact solitude in many parts of the area recommended for wilderness" (BLM, 1987). Because the criteria for identifying Lands with Wilderness Characteristics laid out in BLM Manual 6310 states that most outside impacts may not be considered, this logic no longer makes sense for reasons laid out in detail under the discussion about solitude in this report.



Data: Google Earth, Bing, BLM, USGS, US Census, AZDOT, TWS, Field Survey. Projection: WGS 84 – UTM Zone 12N Produced for Az Wilderness Coalition by Joe Trudeau, Hassayampa Forestry & Ecological. September 2016. www.az-eco.com.



3 miles

1 mile

Section 2:

Documentation of Wilderness Characteristics



The northern extent of the Javelina Peak Proposed Lands with Wilderness Characteristics is rolling tobosa grassland and low shrub/scrub that spreads into the isolated Whitlock Valley, bordered by the distant Peloncillo Mountains. The canyon seen here features a series of rock and mortar dams that have been identified by BLM as having a negligible effect on wilderness character. We agree that these antiquated structures have no detrimental effect on the areas natural character, as they are not visible from this vantage just a few hundred feet away. Outstanding mule deer hunting can be had in this undulating terrain, highlighting the importance of maintaining the units' wild character.

Size Criteria

The Javelina Peak Proposed Lands with Wilderness Characteristics meets the minimum size criteria specified in BLM Manual 6310 with approximately 17,851 acres of contiguous, roadless land under BLM ownership. There is one undeveloped 40 acre private inholding contained within the LWC unit boundary which is not accessed by a wilderness inventory road (see points 30-37 which document the condition of routes that lead to this parcel).

Naturalness

The proposed LWC is striking in its natural beauty and features an extensive core of wild terrain that is largely undisturbed by human impacts. This unit is surely dominated by the forces of nature, and undeniably appears natural to average visitors to this area. There are relatively few primitive routes permeating its boundaries, and no cherrystems. The primitive routes that do enter the proposed unit receive fairly low use, and do not cut deeply into the core of the LWC. Documented human impacts include several old, low-profile rock dams, some small dirt water tanks, some antiquated wildlife water catchments, and a few primitive routes. Substantial human impacts, including the Hot Well Dunes motorized recreation area, a powerline, and maintained roads have been excluded from the proposed LWC with clear, simple, and well-defined unit boundaries.

Few primitive routes, or ways, are located within the LWC unit boundaries. These ways are generally short and do not penetrate into the heart of the unit. Most of the existing primitive routes were not constructed and appear to be user-created (points 2, 20-23, 26, 27 & 38), and/or have revegetated and been reclaimed by natural processes (points 3-5, 7, 29, 30, 31 & 33). The remainder of these unmaintained ways appear to receive very low amounts of vehicular use (points 12, 14, 17, 32, 34-36). The presence of these primitive routes within the proposed LWC does not substantially affect the naturalness of the area within because, as discussed above, many of these routes are barely visible.

Human impacts included within the Javelina Peak Proposed LWC unit are minor and do not affect the naturalness of the unit as a whole. These impacts include fences, several small dams, earth-bermed water tanks, and two wildlife water catchments. Fencing is listed in BLM Manual 6310 as a human impact that can be considered substantially unnoticeable, and the amount of fencing in the unit is relatively minimal. The small rock and mortar dams can be seen in points 13, 15 and 17. As point 18 demonstrates, these relatively small impacts are hardly noticeable when viewed from only a short distance away. Many of the dams have been breached and no longer retain water. Additionally, the BLM determined in their 1987 EIS that these dams have "little impact on naturalness" (BLM, 1987) and were therefore included in the All Wilderness option of that EIS. Furthermore, small dams such as these can be found in existing Wilderness areas; setting the precedent that such structures do not significantly impact qualities of naturalness. Points 9 and 10 display images of a wildlife water catchment that is apparently out of order. Point 8 reveals that this infrastructure is virtually indistinguishable from a nearby vantage point. If indeed this water catchment is non-operational, it is our recommendation that the components be removed and the site rehabilitated. Another similar

catchment is located a short distance from point 5, and is hardly visible from the surrounding area. Again, there are other examples of wildlife water catchments in current Wilderness areas, reinforcing that such sites may be accommodated in LWCs. Other minor human disturbances contained within the proposed LWC are earth-bermed water tanks. BLM Manual 6310 lists earth-bermed tanks among the human impacts that can be considered substantially unnoticeable to the average visitor, and thus do not detract from naturalness. As our photopoints document, the Javelina Peak Proposed LWC has sufficient topographic and vegetative screening throughout to render the relatively minor impacts discussed above unnoticeable.

The Hot Well Dunes Recreation Area is located to the southwest of the proposed LWC unit. A portion of this area was included in the Javelina Peak Wilderness Study Area. This LWC proposal excludes the entire Hot Well Dunes Recreation Area with the LWC unit boundary following a fence line that encloses the recreation area. BLM Manual 6310 states that, "Human impacts outside the area will not normally be considered in assessing naturalness of an area". During our inventory, we did not encounter or observe any OHVs in the recreation area. In addition, the proposed LWC contains abundant topographic relief and vegetative screening to mask backcountry users from detecting the presence of OHVs in the recreation area.

The proposed LWC is dominated by the forces of nature, not man's influences. As we have discussed above, few minor human disturbances can be found within the unit. Those that do exist are generally located at the periphery of the unit and do not detract from the high degree of naturalness throughout the unit. No significant human impacts are located within the core. Ample topographic screening helps to camouflage the impacts of the minor disturbances that do exist. This wild and very scenic unit is largely untouched by human impacts, and as such, appears to exist in a very natural state to the average visitor.



A view into the rugged and pristine heart of the unit from the western powerline boundary road, across washes and rolling ridgelines towards Javelina Peak nearly three miles in the distance. The sights and sounds of the Hot Well Dunes are nearly five miles from this location.

Solitude & Recreation

The proposed LWC provides outstanding opportunities for solitude and primitive and unconfined recreation. Javelina Peak itself is unquestionably the tallest, most scenic and rugged mountain in the entire Whitlock Mountain Range. The LWC unit not only contains the entirety of Javelina Peak, but also includes an area of colorful badlands, natural sand dunes, numerous canyons, and plenty of stunning land to find solitude and to engage in primitive forms of recreation. High-quality solitude can be found throughout the proposed LWC. The rolling lowlands of the San Simon Valley offer plenty of topographic relief to find seclusion among desert vegetation, including cholla, prickly-pear, wolfberry, yucca, creosote, catclaw, Mormon tea, mesquite and more. As visitors climb from the valley floor at about 3,300 feet above sea level, up the steeply sloped Javelina Peak topping out at almost 5,600 feet elevation, there are numerous outstanding opportunities for finding solitude and adventure.



"Varied topography, including numerous desert washes, rolling hills, highly eroded badlands and the mountainous topography of Javelina Peak combine to provide outstanding opportunities for solitude. This same topographic diversity enhances a variety of primitive recreational uses including hiking, horseback riding, rock collecting, rock scrambling, camping and sightseeing" (BLM, 1987: p. 132).

"The size, shape and topography of Javelina Peak WSA provide outstanding opportunities for solitude. Several canyons in the Whitlock Mountains, rolling hills and highly eroded badlands at the base of these mountains and numerous lowland washes combine to offer opportunities for isolation. The high points in the WSA offer excellent views of the surrounding undeveloped countryside and add to the feeling of isolation" (BLM, 1987: p. 62).

The BLM itself has recognized the outstanding potential for primitive recreation within the proposed LWC, stating that the "Javelina Peak WSA offers outstanding opportunities for such primitive recreation as hiking, horseback riding, rock collecting, rock scrambling, camping, photography and sightseeing. Topographic diversity greatly enhances many of these activities" (BLM, 1987 Wilderness EIS: p. 62). Indeed, outstanding hiking, backpacking and horsepacking options are present within the Javelina Peak Proposed LWC today, as they were in 1987. The terrain in the units' western lowlands is ideal for horseback riders seeking to travel cross country through the badlands or among the sand dunes that are not enclosed by the Hot Well Dunes recreation area. Javelina Peak is absolutely unique with its striking, extensive cliff bands and simply being on or around this mountain transforms ordinary primitive recreational experiences into outstanding ones, where hikers and backpackers will find outstanding prospects for navigating challenging terrain. This prominent mountain provides opportunities for extremely challenging ascents, rewarding climbers with exposed summits and expansive views, where rock climbers can explore a number of rugged vertical cliffs with outstanding opportunities for those looking for an out-of-the-ordinary climbing experience.

Exceptional backcountry hunting opportunities can be found within the proposed LWC. Wildlife species of economic and recreational importance include band-tailed pigeon, Gambel's quail, javelina, scaled quail, mountain lion, mule deer, and white-winged dove (www.habimap.com). The Whitlock Mountain Range has a high concentration of species of economic and recreational importance, especially when compared to other areas of the state. A significant portion of the proposed LWC provides habitat for species not found in the surrounding low-elevation desert such as javelina, scaled quail, and mule deer. It is of the utmost importance that public hunting areas with the most species of economic and recreational importance, such as the Javelina Peak Proposed LWC, be protected in order to ensure this vital form of primitive recreation can continue for generations to come.

The proposed LWC unit provides remarkable options for nature study as well. As the photographs in this report attest, nature photographers are presented with a spectacular landscape with a variety of stark settings to photograph. Rock collectors and others interested in geologic features are sure to find many interesting formations to study, including areas with fossils. Those sightseeing for botanical or zoological features will also find a number of unique and noteworthy habitats to explore. Outstanding birdwatching prospects exist in the proposed LWC. Javelina Peak is flanked by a profusion of vertical volcanic cliffs that provide the perfect habitat for a variety of uncommon raptors. Indeed, Peregrine falcons are known to live among these extensive cliff bands. With such great elevational relief, a diversity of birds can be observed in a variety of ecosystems within the LWC unit. Whether a person wants to explore the unit's lowlands or uplands, they're sure to have an outstanding time studying nature's wonders on this magnificent piece of public land.

In the 1987 Wilderness EIS, the BLM concluded that the OHV area (currently the Hot Well Dunes Recreation Area) negatively affected opportunities for solitude within the Javelina Peak WSA, stating that without Wilderness designation:

"Off-road vehicle use of the dunes in the southern part of the WSA would continue, resulting in impacts to opportunities for solitude and primitive recreation. While ORVs are using the area, it would be difficult to find and experience solitude. As ORV use continues to increase, so would impacts to the natural qualities of the WSA" (BLM, 1987: p. 132).

While these statements may have made sense at the time, this line of reasoning is fundamentally flawed regarding impacts to solitude when considering the guidelines laid out in BLM Manual 6310, which states that LWC inventory should "Only consider the impacts of sights and sounds from outside the inventory area on the opportunity for solitude if these impacts are pervasive and omnipresent". Pervasive means existing in every part of something or spreading to every part of something, and omnipresent means present in all places at all times. Our inventory team did not see any ORV users within the Hot Well Dunes Recreation Area during either of our two inventory trips (January and March, 2016). The recreation area most likely receives almost all of its visitors during the spring and autumn when the weather and ground conditions are best. This means that virtually no one is around for the other half of the year. The sights and sounds from the Hot Well Dunes Recreation Area therefore cannot be considered pervasive and omnipresent, and therefore should not be considered detrimental to opportunities for solitude that are found within the proposed LWC. Additionally, the entire northern half of the LWC unit is far from the recreation area and has a tremendous amount of rugged terrain blocking all sights and sounds of the recreation area.



This view into the Javelina Peak Proposed Lands with Wilderness Characteristics is from the northern tip of the Hot Well Dunes Recreation Area, a popular motorized recreation area where users drive over hundreds of acres of sand dunes. Most users stay within the fenced area, though we discovered two locations where some users cross breaks in the fence. The remaining dunes, badlands, and sprawling desert flats are sensitive areas where there should be no off-road vehicle travel. Protection of these fragile formations from off-road vehicles could be achieved through management for the protection of wilderness characteristics. The proposed LWC features a truly impressive expanse of desert terrain that is deserving of this level of protection and enhanced management.

Conclusion

The Arizona Wilderness Coalition recommends to the Bureau of Land Management that the proposed area should be managed for protection of wilderness characteristics according to the policies established in BLM Manuals 6310 and 6320. In this report, we have provided the requirements for a citizens' proposal, and documented that the proposed unit meets the criteria for size, naturalness, solitude, and primitive and unconfined recreation. The landscape within the proposed LWC unit is ideal for experiencing outstanding solitude. The heavily featured badlands at the western base of Javelina Peak, as well as unique sand dunes, and various drainages and basins all over the mountain, provide countless locations to be alone in a wilderness-like setting. It is especially easy to find solitude in the secluded northeastern part of the proposed LWC in the eastern slopes of the Whitlock Mountains adjacent to the isolated and largely undeveloped Whitlock Valley. Outstanding solitude can also be found at the rarely summited top of Javelina Peak where one can gaze out across an expansive landscape in a remote region with few signs of civilization present for many miles. The Javelina Peak proposed LWC provides outstanding opportunities to pursue primitive and unconfined recreation. Backcountry visitors can choose from many different forms of recreation, and with almost 18,000 acres to explore, they will most certainly find solitude as well. The dramatic landscape with expansive views and over 2,300 feet of elevational relief transforms ordinary recreational activities into outstanding experiences creating memories that may last a lifetime.

The BLM stated in their 1987 Wilderness EIS that, "The natural qualities of the area not recommended for wilderness would show increasing signs of ORV use". Indeed, today this is the case; points 26 and 27 document the illegal cutting of fencing meant to keep ORV users within the Hot Well Dunes Recreation Area. The Javelina Peak unit needs to be managed as an LWC in order to prevent further degradation of the wilderness quality lands including unique sand dunes, sensitive natural areas, and desert vegetation. Protection of these wilderness characteristics is essential to preserving the natural values present throughout the unit.

Arizona Wilderness Coalition has previously stated that:

"If this area is not protected by wilderness status, the ecologically significant southern end would face a significant increase in ORV use. This would have an extremely detrimental effect on both the land and the wildlife. Moreover, since fossils have been found in the badlands, increased ORV use could have an adverse impact on undiscovered sites" (AWC, 1987: p. 193).

Since that time, the area now managed for motorized recreation has lost its wilderness characteristics. We strongly believe that the BLM must not sacrifice any more of this special, wild landscape to off-road recreation. Management for preservation of wilderness characteristics is needed at Javelina Peak.

Works Cited:

AWC. 1987. Arizona Wilderness: A proposal prepared by the Arizona Wilderness Coalition, December, 1987.

BLM. 1987. Safford District Final Environmental Impact Statement: Proposed Wilderness Program for the Safford District Wilderness EIS Area. Department of the Interior, Bureau of Land Management, Safford District, Arizona.

Section 3: Detailed Description of the Unit Boundary, Roads, Ways and Human Impacts

Narrative Description of the Proposed LWC Boundary & Vehicle Routes

Segment A: Northwest Boundary - Powerline

General Description: The northwestern boundary of the Javelina Peak Proposed LWC is a powerline and an unnamed powerline access road (point 1).

Ways:

-Point 2 shows an image of a short user-created primitive route that is kept open solely by the passage of vehicles. As the photo illustrates, this way minimally affects naturalness, and would naturally revegetate if vehicle use were terminated.

-Point 3 displays a photograph of an old way that was once used to access a water tank, but has since revegetated and been reclaimed by nature. Point 4 provides further evidence that this old primitive route has naturalized.

-Point 5 was taken looking southeast down another old vehicle way that has been reclaimed by natural processes and can no longer be negotiated by a vehicle.

Segment B: Northeast Boundary

General Description: The northeastern unit boundary is comprised of the BLM property line with State Trust Land, as well as a wilderness inventory road seen in points 6 and 11. Point 16 was taken at the northeastern unit boundary from Badger Well Den Road looking west down a fence line that runs along the BLM property line (unit boundary).

Boundary Adjustments:

An earth-bermed tank just to the west of point 7 and directly along the boundary road is excluded from the proposed LWC because it is likely to be mechanically maintained.

Ways:

-Point 7 shows a reclaimed way that has naturally revegetated and no longer receives vehicular use.

-Points 12 and 14 depict an unmaintained primitive route that leads to a series of small dams (points 13 & 15). These dams were analyzed during the initial wilderness inventory and BLM determined that they did not substantially affect the naturalness of the unit.

Associated Human Impacts:

-Points 8, 9, and 10 document an old wildlife water catchment that appears to be non-functional. Point 8 illustrates that this water catchment is substantially unnoticeable across the landscape.

-Points 13 and 15 show two small dam structures that do not substantially affect the naturalness of the area. As point 15 displays, the upper dam has been breached and is no longer effective.

Segment C: Southeast Boundary – Badger Den Well Road & Hot Well Dunes Recreation Area

General Description: This boundary consists of a maintained road called Badger Den Well Road (points 19 & 24). From the cattle guard seen in point 24, the LWC unit boundary turns to the north and follows a fence line (point 25) that delineates the boundary of the Hot Well Dunes Recreation Area. The fence line (Hot Well Dunes Recreation Area boundary) continues to serve as the proposed unit boundary until it intercepts Haekel Road. Point 28 (taken outside of the proposed LWC unit) shows the Hot Well Dunes Recreation Area, and Haekel Road (left) and Badger Den Well Road (right), which further down each road becomes the southwestern and southeastern unit boundaries, respectively.

Ways:

-Point 17 shows a primitive route with no evidence of maintenance that leads to an old dam at Dripping Springs.

-Point 20 was taken looking north up a user-created way. This primitive route is not maintained and ends where vegetation restricts vehicle passage just a short distance up the wash.

-Point 21 depicts another user-created way that slowly fades as it travels away from the boundary road. This primitive route is kept open solely by the passage of vehicles and does not substantially affect naturalness.

-Point 22 shows a faint primitive route that is kept open solely by the passage of vehicles. Point 23 displays an image of this route near its terminus.

-Points 26 and 27 document two locations where the fence that delineates the boundary of the Hot Well Dunes Recreation Area was cut, and off-highway vehicles were used to create two primitive routes that enter the proposed LWC unit. As stated above, these are user-created ways that have never been mechanically maintained. It is our recommendation that the fence line be mended to keep the motorized vehicle use within the recreation area.

Associated Human Impacts:

-Points 17 and 18 show images of an old dam at Dripping Springs that was built by the Civilian Conservation Core. The reservoir is dry behind the dam and the metal pipe leading to a water tank is broken allowing water to drain into the creek. As these photographs depict, this human impact is substantially unnoticeable to the average visitor and does not detract from naturalness.

Segment D: Southwest Boundary

General Description: Haekel Road is a chip-sealed secondary road that forms most of the southwestern unit boundary of the proposed LWC. There is a small parcel of private land along Haekel Road where the LWC boundary follows the BLM property line around the private parcel.

Ways:

-Point 29 shows an old vehicle way with no apparent purpose that has naturally revegetated and been reclaimed by nature. There was no evidence of vehicular use at the time of our inventory.

-Points 30 and 31 display images of a reclaimed way in a natural wash that is listed in the BLM's route inventory. Our inventory team found no evidence of such a route and the wash showed no signs of vehicular use.

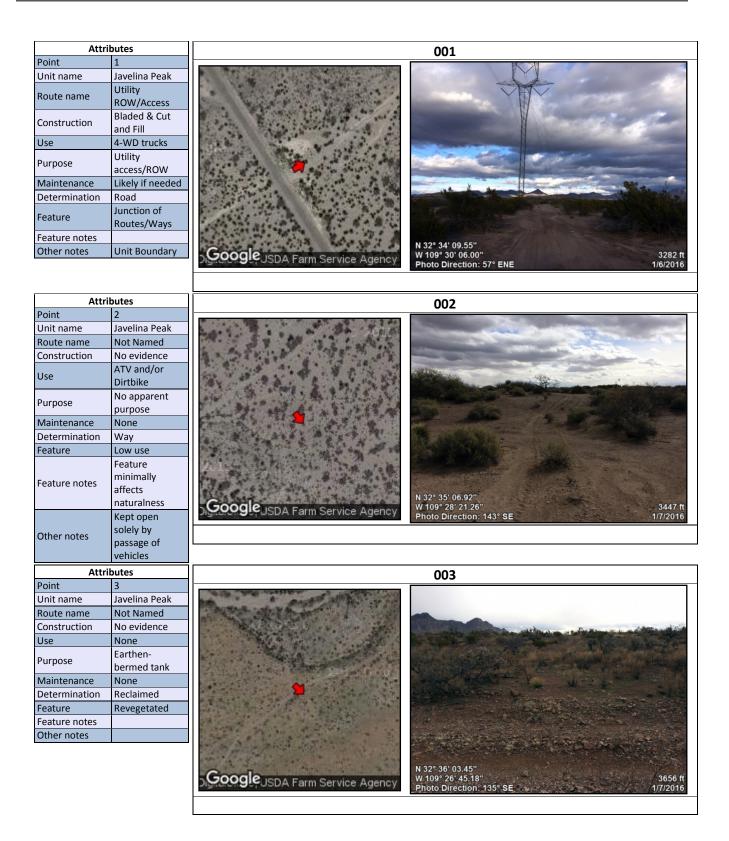
-Point 32 was taken from Haekel Road on private land looking toward the proposed LWC unit. This point documents a rarely used way that leads to an earth-bermed tank on BLM land.

-Point 33 (also taken from Haekel Road on private land) depicts an old way that has been closed to vehicles. Points 34-36 show images of this same way farther to the east where it apparently does receive vehicular use, albeit very infrequently. This primitive route leads to an old corral that appears to be defunct (point 37) and an earth-bermed tank (KMP tank). As points 34-36 display, this way is revegetating and does not detract from the naturalness of the area.

-Point 38 was taken from the unit boundary looking to the northeast up a natural wash that receives some vehicular use. This wash contains no evidence of construction or maintenance.

Associated Human Impacts:

-Point 37 documents the unmaintained condition of a corral near KMP tank.









Attributes	
Point	5
Unit name	Javelina Peak
Route name	Not Named
Construction	No evidence
Use	None
Purpose	No apparent
	purpose
Maintenance	None
Determination	Reclaimed
Feature	Revegetated
Feature notes	
Other notes	





Attributes	
Point	006
Unit name	Javelina Peak
Route name	Not Named
Construction	Bladed & Cut and Fill
Use	4-WD Trucks
Purpose	Wildlife Water
Purpose	Catchment
Maintenance	Old evidence -
Maintenance	3-5 years ago
Determination	Road
Feature	Typical
	Condition of
	Route/Way
Feature notes	
Other notes	Unit Boundary





Attributes	
Point	7
Unit name	Javelina Peak
Route name	Not Named
Construction	Bladed & Cut and Fill
Use	None
Purpose	None
Maintenance	None
Determination	Reclaimed
Feature	Revegetating
Feature notes	
Other notes	





Attributes	
Point	8
Unit name	Javelina Peak
Route name	N/A
Construction	N/A
Use	N/A
Purpose	N/A
Maintenance	N/A
Determination	N/A
Feature	Over view of water catchment
Feature notes	Substantially unnoticeable
Other notes	

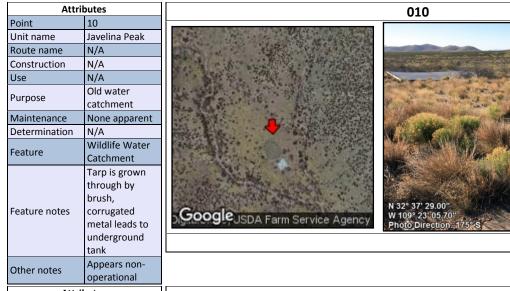




Attributes	
Point	9
Unit name	Javelina Peak
Route name	N/A
Construction	N/A
Use	None apparent
Purpose	N/A
Maintenance	N/A
Determination	N/A
Feature	Water trough -
reature	no H2O
	No water
	available, no
Feature notes	water when
	pipe turned
	on=empty tank
	No access
Other notes	route, seems
	ahandoned







Other notes	operational		
Attr	ributes		011
Point	11	AND EVALUATION OF THE PROPERTY	
Unit name	Javelina Peak		
Route name	Not Named	经国际公共 一种 人名英格兰	
Construction	Bladed		The state of the s
Use	4-WD Trucks		
Purpose	Wildlife water		
Maintenance	Old evidence -		
Maintenance	3-5 years ago		
Determination	Road		
	Typical		
Feature	Condition of		
	Route/Way		
Feature notes		· · · · · · · · · · · · · · · · · · ·	AND THE RESERVE OF THE PARTY OF
Other notes	Unit Boundary	2.200 N N N N N N N N N N N N N N N N N N	N 200 274 56 74W
		Google	N 32° 37' 56.71" W 109° 22' 23.59"

Attributes	
Point	12
Unit name	Javelina Peak
Route name	Not Named
Construction	Bladed
Use	4-WD trucks
Purpose	Dam developments
Maintenance	No evidence
Determination	Way
Feature	Typical Condition of Route/Way
Feature notes	
Other notes	<none></none>

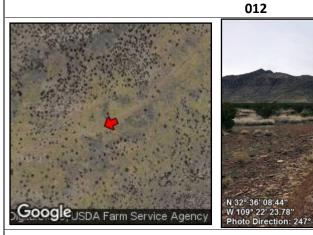


Photo Direction: 216°, SW 3/13/2016

Attributes	
Point	13
Unit name	Javelina Peak
Route name	N/A
Construction	Concrete/stone
	dam
Use	N/A
Purpose	N/A
Maintenance	Periodic
Determination	N/A
Feature	Dam
Feature notes	
Other notes	<none></none>





Attributes	
Point	14
Unit name	Javelina Peak
Route name	Not Named
Construction	No evidence
Use	ATV and/or Dirtbike - very rare
Purpose	Dams
Maintenance	None
Determination	Way
Feature	Typical Condition of Route/Way
Feature notes	Feature minimally affects naturalness
Other notes	











Attributes		
Point	16	
Unit name	Javelina Peak	
Route name	N/A	
Construction	N/A	
Use	N/A	
Purpose	N/A	
Maintenance	N/A	
Determination	N/A	
Feature	Fence line	
Feature notes		
Other notes	Unit Boundary	





Attributes	
Point	17
Unit name	Javelina Peak
Route name	Not Named
Construction	Probably only bladed once
Use	4-WD trucks
Purpose	Small Concrete Dam
Maintenance	None
Determination	Way
Feature	Typical Condition of Route/Way
Feature notes	Dripping Springs Access
Other notes	Dry behind dam, metal pipe to tank is broken allowing water to drain into creek

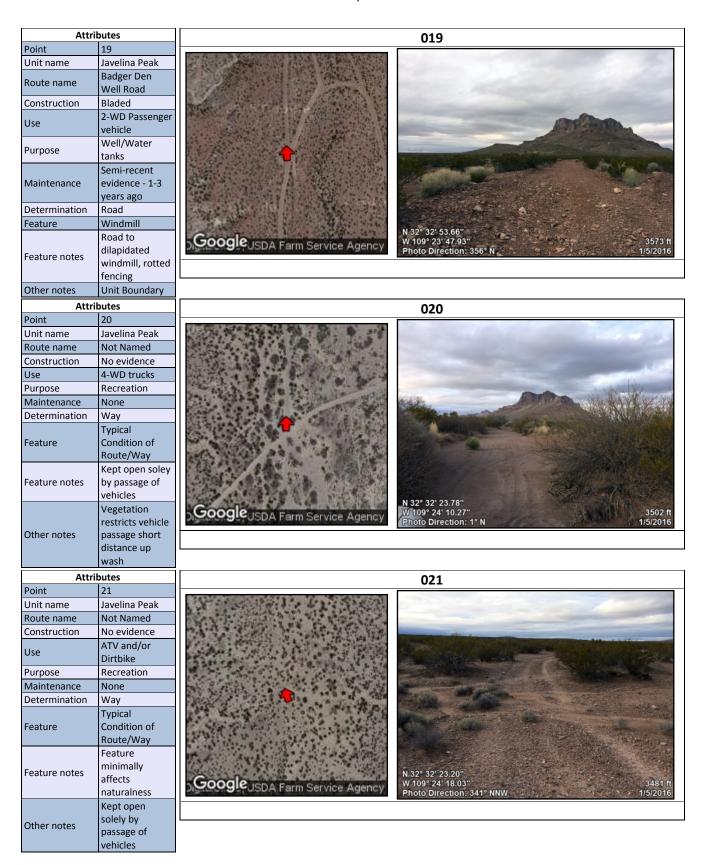


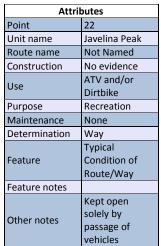
















Attributes	
Point	23
Unit name	Javelina Peak
Route name	Not Named
Construction	No evidence
Use	ATV and/or
	Dirtbike
Purpose	Recreation
Maintenance	None
Determination	Way
Feature	End of Way
Feature notes	Way ends
	before drop off
Other notes	Kept open
	solely by vehicle
	passage





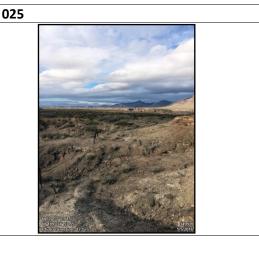
Attributes	
Point	24
Unit name	Javelina Peak
Route name	Badger Den Well Road
Construction	Bladed
Use	2-WD Passenger vehicle
Purpose	Multiple uses
Maintenance	Very recent blade - past year
Determination	Road
Feature	Typical Condition of Route/Way
Feature notes	Cattleguard in foreground
Other notes	Possible boundary of the ATV play area







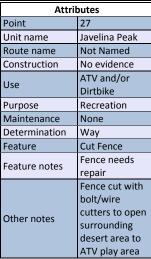




Attributes	
Point	26
Unit name	Javelina Peak
Route name	Not Named
Construction	No evidence
Use	ATV and/or Dirtbike
Purpose	No apparent purpose
Maintenance	None
Determination	Way
Feature	Fence cut illegally
Feature notes	Fence should be repaired
Other notes	Kept open solely by passage of vehicles



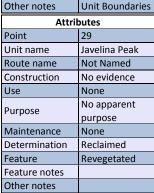


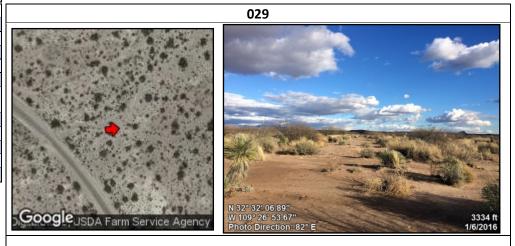












Attributes	
Point	30
Unit name	Javelina Peak
Route name	Not Named
Construction	No evidence
Use	None
Purpose	None apparent
Maintenance	None
Determination	Reclaimed
Feature	Revegetated
Feature notes	Feature
	minimally
	affects
	naturalness
Other notes	











Attributes	
Point	32
Unit name	Javelina Peak
Route name	Not Named
Construction	No evidence
Use	4-WD trucks
D	Earthen-
Purpose	bermed tank
Maintenance	None
Determination	Way
Feature	Typical
	Condition of
	Route/Way
Feature notes	Feature
	minimally
	affects
	naturalness
Other notes	

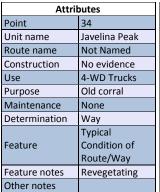




Attributes	
Point	33
Unit name	Javelina Peak
Route name	Not Named
Construction	No evidence
Use	None
Purpose	KMP tank
Maintenance	None
Determination	Reclaimed
Feature	Revegetated
Feature notes	Feature minimally affects naturalness
Other notes	Way closed to vehicles











Attributes	
Point	35
Unit name	Javelina Peak
Route name	Not Named
Construction	No evidence
Use	4-WD Trucks
Purpose	Old corral
Maintenance	None
Determination	Way
Feature	Typical Condition of Route/Way
Feature notes	
Other notes	Kept open solely by vehicle passage

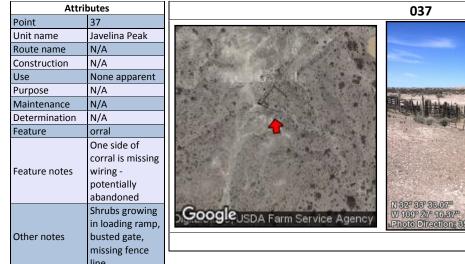




Attributes	
Point	36
Unit name	Javelina Peak
Route name	Not Named
Construction	No evidence
Use	4-WD Trucks
Purpose	Earth-bermed
	tank/corral
Maintenance	None
Determination	Way
Feature	Typical
	Condition of
	Route/Way
Feature notes	Obvious lack of
	maintenance
Other notes	









ime	
Attributes	
38	
Javelina Peak	
Not Named	
No evidence	
Off Road	
Vehicles	
No apparent	
purpose	
None	
Way	
Natural Wash	
Low use	
probable	



