

Grand Canyon – Parashant and Vermilion Cliffs National Monuments

Wilderness Proposal

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**Arizona
Wilderness
Coalition**

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Introduction

The Arizona Wilderness Coalition (AWC) presents this 950,000-acre conservationist's wilderness recommendation as part of the Bureau of Land Management's scoping process for the Arizona Strips Resource Management Plan revision process. This effort comprises the first comprehensive citizen's wilderness proposal for the Arizona Strip and provides thorough documentation of "requisite wilderness characteristics" for 22 units within the Grand Canyon-Parashant National Monument; seven within the Vermilion Cliffs National Monument; and one outside the Monuments but adjacent to an existing wilderness. The AWC is also preparing subsequent wilderness proposals outside the monuments for the Hurricane Cliff, Kanab Creek Wilderness addition (Robinson-Water Canyons, Grama Canyon), Castle Peak (GCPNM), Rock Canyon (Buck Pasture Quad), Lost Springs Mountain, and Seegmiller-Rock Canyon in the western House Rock region.

We believe our wilderness recommendations are well justified within the scope of BLM's continuing obligation to inventory and study lands exhibiting wilderness characteristics. We further believe that our wilderness recommendations are very reasonable, particularly in the context of the wilderness residual transportation network. These recommendations should have minimal affect on mechanized users that are currently and legally accessing the National Monuments:

- The roads adjacent to the proposed wilderness boundaries and our recommended cherry stems meet the legal BLM definition for roads.
- The wilderness recommendation does not close any County Roads and only two numbered BLM Routes within the two National Monuments.
- The wilderness residual transportation network provides for a very high level of legal motorized access within the National Monuments. 60% of the GCPNM is within one mile of a road. 88% of the GCPNM is within 2 miles of a road.
- The wilderness residual transportation network provides about 0.5 miles of legal road per section (sq. mi.) which is compatible with the preservation mandate for many of the proclaimed objects of the monuments.
- The conservationists' wilderness recommendation respects the permitted ranchers' access needs based on provisions within the Wilderness Act of 1964 and adherence to minimum requirement analysis.

While the wilderness residual transportation network supports our wilderness recommendations, the BLM still has a responsibility to conduct a comprehensive analysis that will provide a transportation network that is compatible with the purpose of preserving the proclaimed objects of the National Monuments. The following discussion provides the justification for our wilderness recommendations.

Mandate from Congress

In the 1976 Federal Land Policy and Management Act (FLPMA; Public Law 94-579), Congress gave BLM its first unified, comprehensive mandate on public lands management. The law established a policy of retaining the public lands in Federal ownership, and it directed the BLM to manage them under principles of multiple use and sustained yield. Management decisions for the public lands are made through land-use

planning processes that consider all potential uses of each land area, including wilderness. All public lands are to be managed so as to prevent unnecessary or undue degradation of the lands as required by Section 302(b) of FLPMA (USDI 1995).¹

FLPMA established wilderness preservation as part of BLM's multiple-use mandate, and recognized wilderness values as part of the spectrum of resource values considered in the land-use planning process. FLPMA (Section 603) specifically directed the BLM, for the first time, to carry out a wilderness review of the public lands. Section 202 of FLPMA provides for subsequent evaluation of lands qualifying as wilderness (USDI 1995).

The Arizona BLM Wilderness Inventory (1978-82)

The wilderness inventory began in the fall of 1978 when Arizona Strip District personnel identified roadless areas of 5,000 acres or more. Once inventory units were numbered and defined, the agency's district offices prepared a "Situation Evaluation" for every unit. This process described general conditions based on information readily available to the staff. Five wilderness criteria were, in theory, considered for each inventory unit: size, naturalness, outstanding opportunities for solitude or primitive and unconfined recreation, other supplemental values, and **"the unit's potential for returning to its natural condition if there had been human activity in the unit"** (emphasis added; USDI, BLM 1979:3 Preliminary Findings).

The review included "roadless parcels of public land of at least 5,000 acres...and all roadless parcels of public land adjacent to existing or proposed wilderness administered by another federal agency, again regardless of the size of the parcel" (USID, BLM, 1979, Decision Report). This latter criteria was consistently ignored (Arizona Wilderness Coalition 2002).

"Roads" were presented as "important factors in determining the wilderness potential of an area," specifically the **boundaries** of the Inventory Units:

The word 'road' refers to a means of access which has been improved and maintained by mechanical means (use of hand tools or power machinery) to ensure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road"...We need to know whether you have knowledge of roads which we overlooked in defining the unit boundaries, or whether the roads we did use may not meet the definition. (USDI, BLM, 1979, Preliminary Findings, page 8).

This definition is derived from the FLPMA legislative history (H.R. Rep. No. 94-1163 at 17 (1976).

When the Situation Evaluations were completed, District Managers reviewed and subsequently forwarded each to the State BLM Director for decisions on preliminary findings. The agency eliminated areas "clearly and obviously" lacking wilderness characteristics (USDI, BLM, 1979, Preliminary Findings, page 1; USDI, BLM, 1979, Decision Report). After a 90-day public review, lands believed to meet wilderness criteria were proposed for a more intensive inventory involving on-the-ground inspections to verify

the wilderness qualities. This "intensive inventory," including a 90-day public review, produced 41 Wilderness Study Areas (WSA's), subsequently evaluated in the 1982 Arizona Strip Wilderness Study Areas Draft Environmental Impact Statement (USDI, BLM 1982, page 7, 15).ⁱⁱ

After the WSA's were identified in the wilderness inventory, they became the wilderness recommendations in "Step 1" of the management framework plans (MFPs) for the study area. Step 2, "manageability," addressed whether or not the area could be "effectively managed to preserve its wilderness character." The agency's final step, Step 3, was the District Manager's final decision regarding wilderness suitability (USDI, BLM 1982:7-8). The historical review presented in this wilderness proposal disputes the manager's decision to drop from wilderness consideration most of the WSAs. The Secretary of the Interior forwarded the recommendation to the President, who in turn forwarded the recommendation to Congress as required by FLPMA.

Criteria 1 consisted of four "wilderness study criteria and quality standards" applied to each WSA between Step 1 and Step 2: (USDI, BLM 1982, page 7-8).ⁱⁱⁱ "Mandatory Wilderness Characteristics" consisted of size, naturalness, and outstanding opportunities for solitude or primitive recreation. Other considerations included

- Special Features: ecological, geologic, or other features of scientific, educational, scenic, or historic value.
- Multiple Resource Benefits: benefits to other resources and uses that only wilderness designation could ensure.
- Diversity in the National Wilderness Preservation System: 1) expanding the diversity of natural systems, 2) assessing the opportunities for solitude or primitive recreation within a day's driving time (5 hours) of major population centers, and 3) balancing the geographic distribution of wilderness areas (conservationists dispute the validity of these criteria).

Of the 2.8 million acres on the Arizona Strip (USDI, BLM, 1990:S-1), 1,576,672 acres (56 percent) were considered for additional study (USDI, BLM, 1980 Proposal Report). Of this total, the BLM administratively designated 774,148 acres (about 50 percent of the intensively inventoried lands, and about 28 percent of the Arizona Strip) as WSA's. In 1982, the *Arizona Strip Wilderness Study Areas Draft Environmental Impact Statement* recommended designating as wilderness all or parts of only eight of the original 41 WSA's, including 26,186 acres of public land (approximately three and a half percent of the original 774,148 acres; USDI, 1982, DEIS:1). The Arizona Wilderness Act of 1984 designated 265,520 acres (34 percent of the WSA's acreage).^{iv}

Requirement for Wilderness Study

The 1984 Arizona Wilderness Act provided release of Wilderness Study Areas (WSAs) established under Section 603 (c) of FLPMA not designated wilderness on the Arizona Strip District and certain areas in Utah.^v Such lands were no longer subject to the requirement of section 603(c) to manage "in a manner that does not impair suitability for preservation as wilderness."^{vi} The Act's provided a "soft release" and did not preclude future consideration of public lands for wilderness.

The BLM's Wilderness Inventory and Study Procedures^{vii} reiterates direction for subsequent wilderness inventories

provided by FLPMA in Sections 102(a)(2)^{viii} & (8)^{ix}, 201(a)^x, and 202 (c)(4)^{xi} & (9)^{xii} and land-use planning in Sections 202(a)^{xiii}, (b)^{xiv}, (c)^{xv}, and 205(b)^{xvi}. These sections direct BLM to "preserve and protect certain lands in their natural condition" and to "prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern." These Sections also direct the Bureau to utilize inventory information in the development of land-use plans and coordinate public land inventories and planning efforts with other Federal, State, and local agencies and Indian tribes [endnotes added].

BLM is instructed to evaluate wilderness inventory areas "through the land use planning process, using regulations at 43 CFR 1600, and the BLM 1600 Manual and Handbook series, to analyze the values, resources, and uses with the area."^{xvii} The planning process will be used to determine whether these areas should be designated as Wilderness Study Areas (WSAs) to be managed under the IMP BLM Handbook 8550-1. The BLM will use the land use planning process to determine which inventory areas are to be managed as WSAs (USDI 2001 [H-6310-1, Section .06(A)]). The BLM's Draft Procedures and Policy^{xviii} notes that Title II of FLPMA (Section 201) affirms that the BLM has

*the mandate to prepare and maintain inventories of public land resources (including wilderness). In Section 202, BLM has the discretion and authority to conduct new wilderness studies and submit recommendations to the Secretary of Interior. Such reviews are to be conducted through the land use planning process (RMPs or their amendments) and recommendations must be accompanied by a legislative EIS. **Designations or de-designations of the WSA can only be made through an RMP amendment.** Management of the 202 WSAs is found in the 8550 manual. With a few exceptions, the non-impairment policy applies. Pre-FLPMA mining claims are to be managed under the unnecessary and undue standard.*

Citizen's Wilderness Proposals

Other public lands that may require a wilderness inventory include "lands within externally generated proposals that document new or supplemental information regarding resource uses and condition of the lands not addressed in current land use plans and/or prior wilderness inventories (USDI 2001 [H-6310-1, Section .06(D)]). According to a "Recently Issued Solicitor's Opinion Regarding Land Use Planning," the BLM may not refuse to consider credible new information which suggest that the WSA boundaries identified in the late 1970's do not include all public lands within the planning area that have wilderness characteristics are suitable for management as wilderness" (USDI, Bureau of Land Management 2001, Information Bulletin).

The FLPMA and the BLM planning manual require that the BLM provide opportunity for public participation in federal public land use decision making conducted under FLPMA (USDI 2001 [H-6310-1, Section .06(E), page 5]). This includes citizen or BLM generated information regarding wilderness suitability. In order for public requests to

be considered, they should be accompanied by (1) a map which identifies specific boundaries of the area in question; (2) a detailed narrative that describes the wilderness characteristics of the area and documents how that information significantly differs from the information in prior inventories conducted by BLM regarding the wilderness values of the area; and (3) photographic documentation (USDI 2001 [H-6310-1, Section .06(E, page 5])). This proposal provides the requisite information. The BLM is required to determine whether the area in question (or a significant portion thereof) may have wilderness characteristics, and if actions proposed that could degrade the wilderness values or the roadless character so as to disqualify the area from further consideration as a WSA. If so the BLM should initiate a new land use plan or plan amendment to address the wilderness values (USDI 2001 [H-6310-1, Section .06(E), page 5]; see Section .06(F), page 6).

Evaluation of Wilderness Values

The BLM defines "mandatory" and "optional" wilderness characteristics as presented in Section 4(b) of the Wilderness Act (USDI 2001 [H-6310-1, Section .22(A), page 19]). Mandatory wilderness characteristics include size, naturalness, and outstanding opportunities for solitude and a primitive and unconfined type of recreation (USDI 2001 [H-6310-1, Section .22(A)(1), page 20]).

A. Mandatory Wilderness Characteristics (Wilderness Character)^{xix}

1) Size

The BLM states (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) that the size criteria will be satisfied for inventory units if the area is greater than 5,000 acres,^{xx} or if the area is less than 5,000, if the following conditions apply

- The area is contiguous with lands which have been formally determined to have wilderness or potential wilderness value
- It is demonstrated that the area is clearly and obviously of sufficient size as to make practicable its preservation and use in an unimpaired condition, and of a size suitable for wilderness management
- The area is contiguous with an area of less than 5,000 acres of other Federal lands administered by an agency with authority to study and preserve wilderness lands, and the combined total is 5,000 acres or more.

The BLM cautions against concluding

that simply because an area is relatively small, it does not have an outstanding opportunity for solitude. Consideration must be given to the interrelationship between size, screening, configuration, and other factors that influence solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]).

2) Naturalness

The BLM requires determination as whether or not the area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]).

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs the agency to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammeled" (uncontrolled) by humans and their activities?

- Roads

The BLM Wilderness Inventory and Study Procedures Handbook (Section .14, page 18) states that "[a]ny portion of an inventoried area found to be roaded...will not be studied further" (this assertion is not supported by wilderness legislative history; see discussion below). A road is defined as a vehicle way "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]).

- "Improved and maintained" requires actions taken physically by people to keep the road open to vehicle traffic. Note that according to the BLM, "improved" does not necessarily mean formal construction, and "maintained" does not necessarily mean annual maintenance(USDI 2001 [H-6310-1, Section .13(A)(2)(a), page 10]).
- "Mechanical Means" requires the use of hand or power machinery or tools(USDI 2001 [H-6310-1, Section .13(A)(2)(b), page 10]). The sole use of hands and feet to move rocks or dirt without the use of tools or machinery does not meet the definition of "mechanical means"(USDI 2001 [H-6310-1, Section .13(A)(3), page 10]). Vehicle routes constructed by mechanical means but which are no longer being maintained by mechanical methods are not roads (USDI 2001 [H-6310-1, Section .13(A)(3), page 10]).
- "Relatively regular and continuous use" means vehicular use which has occurred and will continue to occur on a relatively regular basis. Examples given include access roads for equipment to maintain a stock water tank or other established water sources, mining claims, or maintained recreational sites or facilities (USDI 2001 [H-6310-1, Section .13(A)(2)(c), page 10]). Roads need not be maintained on a regular basis but rather when road conditions warrant actions to keep it in a stable condition (USDI 2001 [H-6310-1, Section .13(A)(3), page 10]).
- A way maintained solely by the passage of vehicle does not constitute a road" (USDI 2001 [H-6310-1, Section .13(A)]). A route established or maintained solely by the passage of vehicles is not considered a road, even if it is used on a relatively regular and continuous basis (USDI 2001 [H-6310-1, Section .13(A)(3), page 9]).

- Roads and Wilderness

The presence of a "road" does not disqualify an area for wilderness. In fact, the Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.^{xxi} Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)^{xxii}, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)^{xxiii}, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25). The BLM provides for WSA designation "when it is reasonable to expect that human imprints will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

- Facilities

Provided that such influences are "substantially unnoticeable, the inventory area may include some human impacts such as trails, trail signs, foot or stock bridges, fire towers fire pre-suppression facilities, pit toilets, research monitoring markers and devices, wildlife enhancement facilities, fisheries enhancement facilities (such as fish traps and stream measuring devices), radio repeater sites, air quality monitoring devices, fencing, spring developments, and small reservoirs" (USDI 2001 [H-6310-1, Section .13(B)(2)(a)(2), page 12]).

- "Purity Standards"

The BLM cautions against an "overly pure approach to assessing naturalness"(USDI 2001 [H-6310-1, Section .13(B)(2)(b)(2), page 13]).

- Outside Human Impacts

The BLM states that human impacts outside the inventory will not "normally" be considered in assessing naturalness of an area, but the agency makes allowances for evaluating such impacts for their "direct affects on the inventory area (USDI 2001 [H-6310-1, Section .13(B)(2)(c)]). The Wilderness Act, and subsequent legislation such as the Eastern Areas Wilderness Act, generally prohibit outside "sights and sound" precluding wilderness designation (see Scott 2001).

3) Solitude or a Primitive and Unconfined Type of Recreation

The BLM states that "[e]ach inventory area must be assessed on its own merits or in combination with an adjacent wilderness area or WSA as to whether an outstanding opportunity exists. There must be no comparison among areas. [H-6310-1, Section .13(B)(3)(b), page 13]). Inappropriate comparisons were invoked as reasons to drop from wilderness consideration a significant number of WSAs (Arizona Wilderness Coalition 2002).

The BLM requires evaluation of the area's "outstanding^{xxiv} opportunities^{xxv} for solitude^{xxvi} or a primitive and unconfined type or recreation"^{xxvii} as specified by Section 2(c) of the Wilderness Act. The agency states the area need not provide outstanding opportunities for both solitude and wilderness^{xxviii} recreation, it "has only to possess one or the other"(USDI 2001 [H-6310-1, Section .22(A)(1)(b), page 21]). A significant number of

WSA's were inappropriately dropped by the 1982 analysis for lacking one element or the other (Arizona Wilderness Coalition 2002).

The BLM stresses that each inventory unit must be assessed on its own merits or in combination with an adjacent wilderness area or wilderness study area (USDI 2001 [H-6310-1, Section .13(B)(3)(b), page 13]). In the earlier review, several WSAs or intensively inventoried units were dropped from wilderness consideration because adjacent unit's wilderness characteristics were not taken into consideration (Arizona Wilderness Coalition 2002). Comparisons are not permitted nor are numerical, alphabetical, or qualitative rating systems. Again, a number of early WSAs or intensively inventoried units were not recommended for wilderness designation because of inappropriate qualitative assumptions (Arizona Wilderness Coalition 2002).

Consideration should be given of only whether factors which influence a person's opportunity to avoid the sights, sounds, and evidence of other people **in** the inventory unit, rather than evaluate opportunity for solitude in comparison to human habitation (USDI 2001 [H-6310-1, Section 13(B)(3)(c)(1)(a), page 15]). The BLM states that "[t]he fact that non-wilderness activities or uses can be seen or heard from areas within the inventory area shall not be considered when analyzing an area's manageability as a WSA" (USDI 2001 [H-6310-1, Section .2(B)(4), page 24]). The agency instructs its staff to

- Avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). Do not assume that simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude (USDI 2001 [H-6310-1, Section 13(B)(3)(c)(1)(b), page 14]). Similarly, do not conclude that simply because an area is relatively small, it does not have an outstanding opportunity for solitude. Consideration must be given to the interrelationship between size, screening, configuration, and other factors that influence solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]), and
- Consider factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

B. Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The Presidential Proclamations specify a number of optional wilderness characteristics (objects) possessed by units proposed for wilderness designation by conservationists (Arizona Wilderness Coalition).

Inventory Process

The primary purpose of the wilderness inventory is to document the presence or absence of public lands with *wilderness character* (USDI 2001 [H-6310-1, Section .11(A), page 8]). The wilderness inventory is the process of determining the presence of roadless

areas (inventory area) with wilderness character (USDI 2001 [H-6310-1, Section .12]). The BLM utilizes its own seven-page "Wilderness Inventory Evaluation" form that describes and documents each inventory unit's presence, extent, and "quality" of wilderness values. Conservationists expanded on the BLM format and extensively documented travel ways and wilderness character in 26 units proposed as wilderness within both monuments.

Wilderness Study Area (WSA) Recommendation

The BLM Wilderness Inventory and Study Procedures Handbook (Section .14, page 18) states that

[a]n inventory area found to possess the requisite wilderness characteristics as defined by the Wilderness Act of 1964 will be further evaluated through the land use planning process to determine if it should be designated as a WSA.

The conservationist's wilderness recommendation provides a thorough documentation of "requisite wilderness characteristics" for 28 units within the two national monuments (Arizona Wilderness Coalition 2002).

WSA Management

Once public lands designated as a WSA through a land use plan (Section 202) shall be managed under the Interim Management Policy for Lands Under Wilderness Review (IMP), Handbook H8550-1 so as not to impair their suitability for wilderness designation (USDI 2001 [H-6310-1, Section .06(G)]). For FLPMA Section 603 WSAs, existing and new mining operations under the 1872 Mining Law are regulated according to the nonimpairment standard.^{xxix} The BLM has the authority under Section 302 of FLPMA to manage Section 202 lands similarly (USDI 1995).

ⁱ Sec. 302(b) "...In managing the public lands the Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands."

ⁱⁱ Note that the 1980 November WSA Map depicts 35 WSA,s, and the 1980 May Proposal Report recommends 24 (or 25 if Kanab Creek is included). In addition to the WSA's, the Arizona Strip contained five "instant study areas" (ISA's). These areas consisted of formally designated "natural" or "primitive" areas designated prior to passage of the FLPMA and included the Paria Canyon and Paiute Primitive Areas, and the Vermilion Cliffs Natural Area. The other ISAs consisted of Big Sage and Gambel-Turbinella Natural Areas. See USDI, BLM 1982, page 7, and USDI, BLM, 1979, Preliminary Findings, page 3).

ⁱⁱⁱ Guidelines for conducting the initial inventory were published on September 27, 1978 by the BLM in the "Wilderness Inventory Handbook."

^{iv} Beaver Dam Mountains, 15,100 acres; Cottonwood Point, 6,860 acres; Grand Wash Cliffs, 37,030 acres; Kanab Creek, 6,700 acres; Mt. Logan, 14,650 acres; Mt. Trumbull, 7,880 acres; Paiute, 87,900 acres; Paria Canyon-Vermilion, 89,400 acres (Arizona acreage only).

^v The Utah areas included "portions of the Starvation Point Wilderness Study Area (UT-0-10-057) and Paria Canyon Instant Study Area and contiguous Utah units in the Cedar City District of the Bureau of Land, Utah, not designated as wilderness by the Act..."

^{vi} Note that, according to the Wilderness Inventory and Study Procedures Handbook (USDI 2001), "[s]ince all wilderness review mandates of Section 603 have been completed, except for Alaska, this section of FLPMA no longer provides pertinent direction for our present recurring land-use planning wilderness inventories."

^{vii} USDI, 2001, (BLM Manual H-6310-1), Section .08(B) Historic Background (page 7).

^{viii} 102(a)(2): "[The Congress declares that it is the policy of the United States that] the national interest will be best realized if the public lands and their resources are periodically and systematically inventoried and their present and future use is projected through a land use planning process coordinated with other Federal and state planning efforts."

^{ix} Sec.102(a)(8): "[Congress declares that it is the policy of the United States that] the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use;"

^x Sec. 201(a) The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern. This inventory shall be kept current so as to reflect changes in conditions and to identify new and emerging resource and other values. The preparation and maintenance of such inventory or the identification of such areas shall not, of itself, change or prevent change of the management or use of public lands.

^{xi} Sec. 202(c)(4): "[In the development and revision of land use plans, the Secretary shall] rely, to the extent it is available, on the inventory of the public lands, their resources, and other values;"

^{xii} Sec. 202(c)(9): " [In the development and revision of land use plans, the Secretary shall] to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other federal departments and agencies and of the States and local governments within which the lands are located, including, but not limited to, the statewide outdoor recreation plans developed under the Act of September 3, 1964 (78 Stat. 897), as amended , and of or for Indian tribes by, among other things, considering the policies of approved State and tribal land resource management programs. In implementing this directive, the Secretary shall, to the extent he finds practical, keep apprised of State, local, and tribal land use plans; assure that consideration is given to those State, local, and tribal plans that are germane in the development of land use plans for public lands; assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans, and shall provide for meaningful public involvement of State and local government officials, both elected and appointed, in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant impact on non-Federal lands. Such officials in each State are authorized to furnish advice to the Secretary with respect to the development and revision of land use plans, land use guidelines, land use rules, and land user regulations for the public lands within such State and with respect to such other land use matters as may be referred to them by him. Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal lands and the purposes of this Act.

^{xiii} Section 202(a) The secretary shall, with public involvement and consistent with the terms and conditions of this Act, develop, maintain, and, when appropriate, revise land use plans which provide by tracts or areas for the use of the public lands. Land use plans shall be developed for the public lands regardless of whether such lands previously have been classified, withdrawn, set aside, or otherwise designated for one or more uses.

^{xiv} Section 202(b) In the development and revision of land use plans, the Secretary of Agriculture shall coordinate land use plans for lands in the National Forest system with the land use planning and management programs of and for Indian tribes by, among other things, consider the policies of approved tribal land resource management programs.

^{xv} Section 202 (c) In the development and revision of land use plans, the Secretary shall—

- (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law;
- (2) use a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic and other sciences;
- (3) give priority to the designation and protection of areas of critical environmental concern;

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- (4) rely, to the extent it is available, on the inventory of the public lands, their resources, and other values;"
- (5) consider present and potential uses of the public lands;
- (6) consider the relative scarcity of the values involved and the availability of alternative means (including recycling) and sites for realization of those values;
- (7) weigh long-term benefits to the public against short-term benefits
- (8) provide for compliance with applicable pollution control laws, including State and Federal air,
- (9) to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other federal departments and agencies and of the States and local governments within which the lands are located, including, but not limited to, the statewide outdoor recreation plans developed under the Act of September 3, 1964 (78 Stat. 897), as amended, and of or for Indian tribes by, among other things, considering the policies of approved State and tribal land resource management programs. In implementing this directive, the Secretary shall, to the extent he finds practical, keep apprised of State, local, and tribal land use plans; assure that consideration is given to those State, local, and tribal plans that are germane in the development of land use plans for public lands; assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans, and shall provide for meaningful public involvement of State and local government officials, both elected and appointed, in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant impact on non-Federal lands. Such officials in each State are authorized to furnish advice to the Secretary with respect to the development and revision of land use plans, land use guidelines, land use rules, and land user regulations for the public lands within such State and with respect to such other land use matters as may be referred to them by him. Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal lands and the purposes of this Act.

^{xvi} Sec. 205(b) Acquisitions pursuant to this section shall be consistent with the mission of the department involved and with applicable departmental land-use plans.

^{xvii} USDI, 2001, (BLM Manual H-6310-1), Section .21 (p.19).

^{xviii} USDI, 1999, Wilderness Proposals, Section 2: Section 202 Wilderness Study Areas.

^{xix} "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

^{xx} Wilderness Act, Section 2(c).

^{xxi} The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

^{xxii} "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

^{xxiii} "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

^{xxiv} Defined in USDI 2001 [H-6310-1, Section .13(B)(3)(b)(1)(b)] as "standing out among others of its kind, conspicuous, prominent," or "superior to others of its kind; distinguished; excellent."

^{xxv} Defined in USDI 2001 [H-6310-1, Section .13(B)(3)(b)(1)(c)] as "a situation or condition favorable to the attainment of a goal."

^{xxvi} Defined in USDI 2001 [H-6310-1, Section .13(B)(3)(b)(1)(a)] as "the state of being alone or remote from others; isolation," or as "a lonely or secluded place."

^{xxvii} Defined in USDI 2001 [H-6310-1, Section .13(B)(3)(b)(2)] as "nonmotorized (sic), non-mechanical (except as provided for by law), and undeveloped types of recreation activities."

^{xxviii} I.e, a primitive and unconfined type or recreation.

^{xxix} "During the period of review of such areas and until Congress has determined otherwise, the Secretary shall continue to manage such lands according to his authority under this Act and other applicable law in a manner so as not to impair the suitability of such areas for preservation as wilderness...." This language is referred to as the "nonimpairment" mandate.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Billy Goat Peak East Proposed Wilderness (Quads: St. Thomas Gap, Azure Ridge, Virgin Peak and Pakoon Springs).

Summary:

The Arizona Wilderness Coalition recommends the (25-432-acreage) Billy Goat Peak East¹ for Wilderness designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

This scenic, rugged, proposed wilderness consists of Mojave Desert vegetation and wildlife, including the endangered desert tortoise and bighorn sheep. An important component of the larger Nevada's proposed Billy Goat Peak Wilderness (30,541 acres), Arizona's 24,832 acres create a combined proposed wilderness of 55,373-acres. The Arizona portion includes the dramatic northern "Cockscomb," a prominent ridge visible throughout much of the southwestern National Monument (see photo H-5). This unit is part of the Pakoon ACEC, an area managed primarily for recovery of desert tortoise (USDI, BLM, 1998, page 5 and Map 4).

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1982, the agency stated that

overall, the unit is in a fairly natural condition (USDI, BLM, 1982, EIS:52-3) [and] meets the minimum standards for solitude and recreation...but overall its wilderness character is not of high quality (USDI, BLM, 1982, EIS:21).

Based on this assessment, the BLM proposed entire unit as nonsuitable for wilderness designation (USDI, BLM, 1982, EIS:20).

The Wilderness Act's "minimum standard" for solitude or a primitive and unconfined type of recreation consists of "outstanding opportunities" for those experiences. The agency admitted, albeit reluctantly, that this area met that standard. In addition, policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the agency's earlier, unsubstantiated "high-quality" exclusionary logic.

C. AWC Recommendation

The AWC proposes the entire Billy Goat Peak East (former Pakoon Springs WSA) for wilderness designation based on the analysis presented below.

1) Mandatory Wilderness Characteristics (Wilderness Character)²

a) Size

The proposed Billy Goat Peak Wilderness (55,973 acres: Nevada, 30,541 acres; Arizona, 25,432-acreage) meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1),

page 11]) size criteria of greater than 5,000 acres. The Nevada BLM component is already proposed wilderness.

b) Naturalness

In 1982, the BLM stated that "overall, the unit is in a fairly natural condition" (USDI, BLM, 1982, EIS:52-3). The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs the agency to assess the latter: "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Billy Goat Peak Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable ["fairly natural?"]," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos H-4,5).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Billy Goat Peak East's human imprints consist primarily of an abandoned or little-use travel way not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). As mentioned above the BLM considered Billy Goat Peak East (Pakoon Springs WSA) as "fairly natural," noting that a "pipeline route and vehicle trails are returning to a natural condition, and if closed to vehicles and scarified, they would not be noticeable" (USDI, BLM, 1982, EIS:52-3). AWC maintains that it is reasonable to assume past impacts created by the travel ways described below (see Travel Way Closure section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.³ Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)⁴,

provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁵, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The entire proposed Billy Goat Peak Wilderness size, terrain variation ranging from the softly undulating badlands, to rugged canyons and mountains contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos H-4,5). In the past, the BLM stated Billy Goat Peak East (Pakoon Springs WSA) met the "minimum standards for solitude and recreation" but recommended against wilderness designation because it lacked "high quality" wilderness characteristics (USDI, BLM, 1982, EIS:21). As mentioned above, policy prohibits qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the agency's earlier, unsubstantiated "high-quality" exclusionary logic.

The agency's 1982 decision regarding naturalness and outstanding opportunities for solitude should have supported, not precluded wilderness designation. In addition, the failure to consider the BLM Arizona WSA as an integral part of a much larger wilderness resulted in a seriously flawed suitability analysis. Current BLM policy states that "[e]ach inventory area must be assessed on its own merits **or in combination with an adjacent wilderness area or WSA** as to whether an outstanding opportunity exists [H-6310-1, Section .13(B)(3)(b), page 13]. The AWC firmly believes that the proposed Billy Goat Peak Wilderness (Nevada and Arizona) possesses the requisite mandatory wilderness characteristics and that the BLM should re-evaluate the Arizona portion area under the current criteria.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Billy Goat Peak's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including... numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument."

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces ...a distinctive and remarkable feature
- Riparian corridors...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife
- Numerous threatened or endangered species including the desert tortoise (most of the unit lies within the Pakoon ACEC, an area managed primarily for desert tortoise recovery (USDI, BLM, 1998, page 5 and Map 4).

We urge the BLM to reconsider its earlier analysis and provide Billy Goat Peak East interim protection as a WSA.

1) Proposed Boundary

Beginning in the unit's northwest corner at the intersection of State Route 111 with the Arizona-Nevada state line in Section 18 (Virgin Peak Quad; T36N, R16W); then along SR 111 in a southerly direction (excluding the Pakoon Springs landing strip on the east⁶) to its junction with State Route 113 in Section 15 (Azure Ridge Quad; T34N, R16W); then along SR 113 in a northwesterly direction to its intersection with the Arizona-Nevada state line; then due north to the intersection of the Arizona-Nevada state line with State Route 111 in Section 18 (Virgin Peak Quad; T36N, R16W).

2) Travel Way Closures

A-B; this travel way appears on the BLM map (USDI 2000) and the Azure Ridge and Pakoon Springs quads. Beginning at its junction with State Route 113 in Section 5 (Azure Ridge Quad; T34N, R16W; see photo H-1), A-B becomes generally revegetated and appears abandoned (photos H-2,3) and completely fades. This route is substantially

unnoticeable and should be closed to mechanized access to protect Monument values, especially the habitat for the endangered desert tortoise.

¹ Formerly the Pakoon Springs WSA (unit 1-114; 24,832 acres).

² "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

³ The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

⁴ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁵ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

⁶ The BLM mentioned adjusting the boundary to eliminate 32 acres including the landing strip and access road (USDI, BLM, 1982, EIS:52-3).

BILLY GOAT PEAK EAST



1. H-1; T34N, R16W, Section 5; travel way A-B at its junction with State Route 113.



4. H-4; T35N, R16W, Section 34; travel way A-B completely fades in desert vegetation



3. H-3; T35N, R16W, Section 34; travel way A-B appears revegetated and abandoned.



2. H-2; T34N, R16 West, Section 4; travel way A-B appears revegetated and abandoned.

**Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Grand Wash Cliffs Wilderness Addition (Quads: Grand Gulch Bench, Last
Chance Canyon, Mustang Point, Olaf Knolls, St. George Canyon, Wildcat Ranch)**

Summary:

The Arizona Wilderness Coalition recommends the 36,347-acre Grand Wash Cliffs Addition for Wilderness designation. A review of the 1979-82 WSA process demonstrates wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory reveals that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Grand Wash Cliff Wilderness addition consists primarily of the former Last Chance WSA (1-111; 34,625 acres) excluding approximately 1200 acres on its western margin that became part of the Grand Wash Cliffs Wilderness. The area's most prominent feature is 19 miles of the Upper Grand Wash Cliffs and parts of Hidden and Pigeon Canyons. The Grand Wash Cliffs form part of the boundary for two physiographic provinces: the Basin and Range to the west, and the Colorado Plateau to the east. The Upper Grand Wash Cliffs, formed by erosion along the Grand Wash Fault, present a 1800-foot escarpment of the Kaibab and Toroweap formations and Coconino sandstone. Steep slopes comprised of the Hermit and Supai formations, and supporting desert vegetation consisting primarily of blackbrush, sagebrush, and pinyon-juniper with scattered sagebrush and cliffrose, lie at the cliff's base (USDI, BLM, 1982, Briefing Paper).

B. Historical Review and Critique of the 1982 WSA Decision Process

The BLM described the former Last Chance WSA as possessing

Outstanding opportunities for solitude and unconfined types of recreation (emphasis added). *The viewpoints from atop the rim along with the exposure of geologic formations provide outstanding opportunities for sightseeing and photography...excellent opportunities for hiking and solitude...supplemental features such as prehistoric sites, geologic features, and wildlife are of additional interest...excellent habitat for mule deer and the cliffs themselves provide nesting sites for raptors such as red-tailed and Cooper's hawks and golden eagles* (USDI, BLM, 1982, Briefing Paper).

The BLM documented Last Chance WSAs'

outstanding opportunities for primitive recreation, especially hunting, hiking, and backpacking (USDI, BLM, 1982, EIS:52) [including] [n]umerous side canyons along the escarpment [that] screen visitors for the rest of the unit.... [t]he unit has high-quality wilderness characteristics and has few impacts on naturalness(emphasis added)....[as well as] *16 miles of the Grand Wash Cliffs, an important geologic supplemental value* (USDI, BLM, 1982, EIS:52).

Unfortunately, the Shivwits MFP Step II recommended the entire unit as nonsuitable for wilderness designation:

the unit is 17 miles long and 1.5 to 6 miles wide. It contains 12.2 miles of vehicle trails, 640 acres of state land, and 22 mining claims. The unit's narrowness combined with these other considerations detracts from its manageability as wilderness (USDI, BLM, 1982, EIS:20).

At the time the BLM understood it would (and could) have to "acquire 640 acres of state land to assure this unit's manageability as wilderness" (USDI, BLM, 1982, EIS:20). The agency also stated that "several human impacts occur, including 12.25 miles of vehicular trail, four reservoirs, one catchment, and a mineshaft." But, "except for the trails, the impacts dispersed along the unit's boundary are largely unnoticeable because of the unit's large size" (USDI, BLM, 1982, EIS:52). While

vehicular trails are scattered throughout the unit...many that penetrate the unit below the cliffs do not extend as far as a mile and are returning to a natural state. The trails above the cliffs wind through pinyon-juniper and are largely unnoticeable (USDI, BLM, 1982, EIS:52).

The recent citizen's inventory of travel ways is discussed below, but we concur that the "impacts along the unit's boundary are largely unnoticeable" to this day. The "unit's narrowness" is not a relevant issue today since Last Chance is contiguous with an existing designated wilderness. The BLM raised another objection to wilderness designation:

The National Park Service has endorsed 2.9 million acres of similar country [not specified] for designation, and MFL has recommended designation of similar country within 20 miles [amount and location not specified]. This WSA would not add to the diversity or improve upon the distribution of wilderness within the National Wilderness Preservation System (USDI, BLM, 1982, EIS:20).

Current BLM policy stresses that each inventory unit must be assessed on its own merits or in combination with an adjacent wilderness area or wilderness study area (USDI 2001 [H-6310-1, Section .13(B)(3)(b), page 13]) including other federal agencies such as the NPS (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]). Proximity and similarity to other non-contiguous wilderness areas does not detract from the unit's wilderness character. In addition, comparisons are not permitted nor are numerical, alphabetical, or qualitative rating systems. Even under the earlier criteria, the unit should have been recommended for wilderness designation and not dropped.

C. AWC Recommendation

The Arizona Wilderness Coalition recommends the (acreage) Grand Wash Cliffs Addition for WSA designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New

information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

1) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed 36,347-acre addition to the Grand Wash Cliffs Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.²

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed addition to the Grand Wash Cliffs Wilderness, the answer to both questions is yes (see photos KC-29-1,4,9,12; KC-37-2,4,10,20,23,24)). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). The Grand Wash Wilderness addition's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]) and are in fact "substantially unnoticeable."

In 1982, the BLM noticed that "vehicular trails are scattered throughout the unit...[but] many that penetrate the unit below the cliffs do not extend as far as a mile and are returning to a natural state." The agency also pointed out "[t]he trails above the cliffs wind through pinyon-juniper and are largely unnoticeable" (USDI, BLM, 1982, EIS:52). The BLM stated that the Last Chance WSA "has high-quality wilderness

characteristics and has few impacts on naturalness" (USDI, BLM, 1982, EIS:52). The recent citizen's inventory of travel ways is discussed below, but we concur that the "impacts along the unit's boundary are largely unnoticeable" to this day.

The AWC maintains that it is reasonable to assume past impacts created by the travel ways described below "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]). In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.³

Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)⁴, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁵, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25). For example, Congress designated the adjacent Grand Wash Cliffs WSA (also recommended by the BLM as nonsuitable for wilderness designation; USDI, BLM, 1982, EIS:20) as wilderness in 1984 and included the eight-mile "road" separating the former Grand Wash Cliffs WSA from Last Chance WSA. That road is now a hiking trail.

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Grand Wash Wilderness addition's size, terrain variation ranging from the gently undulating juniper and pinyon forests to rugged canyons and cliff contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (see photos KC-29-1,4,9,12; KC-37-2,4,10,20,23,24).

In 1982, the BLM assessed that the area possessed "outstanding opportunities for solitude and unconfined types of recreation" (USDI, BLM, 1982, Briefing Paper; USDI, BLM, 1982, EIS:52). The agency stressed that "[n]umerous side canyons along the escarpment screen visitors for the rest of the unit." The recent citizen's inventory demonstrates the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and primitive and unconfined types of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation and located within the proposed Grand Wash Wilderness Addition provide a compelling list of "optional Wilderness Characteristics" and include:

- a) **A remote area** consisting of
 - open, undeveloped spaces
 - engaging scenery
 - natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

- b) **A geological treasure**, including
 - colorful... Paleozoic strata against the highly faulted terrain
 - recent sinkholes and breccia pipes
 - fossils including invertebrate fossils.
 - portions of geologic faults, including 16 miles of the Grand Wash Cliffs, an important geologic supplemental value [see USDI, BLM, 1982, EIS:52].

- c) **Important watersheds** for the Colorado River and the Grand Canyon....

- d) **Features** indicating a long and rich human history spanning more than 11,000 years including:
 - Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
 - Areas of importance to existing Indian tribes
 - Historic features protected in nearly their original context...[by] the remote and undeveloped nature of the monument"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

- e) **Outstanding biological resources** preserved by remoteness and limited [vehicle] travel corridors:
 - intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
 - Riparian corridors linking the plateau to the Colorado River corridor below, allowing wildlife movement and plant dispersal
 - Diverse wildlife
 - Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

3) Proposed Boundary

The unit is contiguous to the Grand Wash Cliffs Wilderness to the west. Beginning in the northeastern corner at the junction of the Grand Wash Cliffs Wilderness and BLM Route 1003 (St. George Canyon Quad; T36N, R13W, Section 7), in an easterly direction along BLM Route 1003 (approximately 2.2 miles) to its junction with BLM

Route 1071 in Section 13; then in a southerly direction along 1071 to its junction with an unnumbered route beginning immediately west of "Eastview 6593" (Last Chance Canyon quad; T34N, R13W, Section 32); then along that unnumbered route in a southerly direction to point "H" (Mustang Pt. Quad; T34N, R13W, Section 16); then continuing in an easterly direction to point "E" in Section 23; then continuing in an easterly direction along the unnumbered route (Wayne Cummings Gardner Road) to its junction with State route 103 in Section 18 (Wildcat Ranch Quad; T34N, R12W); then continuing in a southerly direction along State Route 103 to its junction with BLM Route 1002 (Pigeon Canyon Road) in Section 29; then in a southerly to westerly direction along BLM Route 1002 to its junction with BLM Route 1050 (see the "Other Recommended Travel Way Closures" section); then along BLM Route 1050 in a westerly direction (approximately 1/2 mile) to its junction with the Grand Wash Cliffs Wilderness boundary.

4) Travel Way Closures

- Route "W" (St. George Canyon quad; T36N, R13W, section 18) depicted as a jeep trail on the 2000 BLM map and the quad as a jeep trail, is substantially unnoticeable and could not be located.
- Route "Y" (St. George Canyon quad; T36N, R13W, section 16-17) is depicted as a jeep trail on the 2000 BLM map and the quad. It is completely blocked by a washout immediately near its junction with BLM Route 1071 (see photos KC-13-1,2). It should remain closed to mechanized transport.
- Route "X" (Last Chance Canyon Quad; T35N, R3W, sections 6,7, and 8) is depicted as a 2.5 mile jeep trail on the 2000 BLM map and the quad. The travel way is completely revegetated at its junction with BLM Route 1071 with no signs of use (see photos KC-13-3,4,5). It should be closed to all mechanized use.
- Route "Z" (Last Chance Quad; T35N, R13W, section 20) provides access to a wildlife water catchment immediately (20 yards) to the west of BLM Route 1071. The route, indicated on the 2000 BLM map and the quad, is revegetated and is difficult to discern on the ground (see photos KC-13-7,8,9). It should be closed to all mechanized travel beyond the water catchment.
- G-G1 (Mustang Point Quad; T34N, R13W, Sections 21,27,28) a 1.4 mile little-used spur, should be closed and restored to a natural condition. Vistas afforded at travel way H-H1 (Section 20; see photos KC-37-23,24), Hudson Point, or F-F1 (Sections 22,27; see photo KC-37-16), routes AWC proposes to remain open, are much more spectacular.
- K-E begins just west of Pigeon Tank (Wildcat Ranch Quad; T33N, R12W, Section 6; see photo KC-36-24) on BLM Route 1002 and continues four miles until its junction with the "Wayne Cummings Gardner Road" (Mustang Point Quad; T34, R13W, Section 23; see photo KC-37-7). The first 1/2 mile is heavily eroded (photos KC-36-25, KC-37-1). Most of the travel way is generally revegetated with dense, encroaching pinyon-juniper and shrub vegetation (photos KC-37-2,3,4,5,6). The route should be closed to mechanized travel and restored to a natural condition to protect Monument values such as soil and microbial crusts, wildlife, and native vegetation. The first 1/2 mile should be stabilized with log checks and drainage bars, and close to mechanized travel.

- C-D (Grand Gulch Bench Quad) begins in Section 10 (T34N, R14W; photo KC-30-5) on BLM Route 1002 as an indistinct travel way that disappears in dense grass in approximately 0.75 miles in Section 3 (photo KC-30-6). This travel way appears on the BLM map (USDI, BLM, 2000) and the Grand Gulch and Olaf Knolls Quads. It should be close to protect monument values.
- Travel way depicted on the BLM map (USDI, BLM, 2001) and the Grand Gulch Quad (T34N, R14W, Sections 2 and 11) was not evident.
- A-B (Mustang Pt., Grand Gulch Bench Quads) originates on BLM Route 1002 (T34N, R14W, Section 12; photo KC-30-2) and continues 0.6 miles (photo KC-30-3). The travel way is depicted on the BLM map (USDI, BLM, 2001) and the Mustang Pt. Quad. This is a "road to nowhere" and should be closed to protect Monument values such as soils, microbiotic crusts, and desert vegetation.
- C-D is depicted on the Mustang Point Quad but not on the BLM map. This 1.4-mile travel way originates off of BLM Route 1002 in Section 12 (T34N, R14W; photo KC-29-10) and ends at a water tank and trough in Section 6 (T34N, R13W; photo 18). The route is eroded (photo KC-29-19) and should be closed to mechanized use. Agreements for essential maintenance of both tanks can be developed under the BLM's minimum requirement procedures.
- C1-C2, an abandoned or little-used travel way depicted on the Mustang Point Quad (T34N, R13W, Section 7) but not on the BLM map (USDI, BLM, 2000), begins on travel way C-D (photo KC-29-13) and fades in approximately 0.5-miles (photo KC-29-14). The eroding travel way (see photo KC-29-16) is a "road to nowhere" and should be closed to mechanized travel to protect Monument values.
- D1-D2, an abandoned travel way depicted on the Mustang Point Quad (T34N, R13W, Section 7) but not on the BLM map (USDI, BLM, 2000), begins on BLM Route 1002 (T34N, R13W, Section 7; photo KC-29-23) and ends at a tank on travel way C-D (photo KC-29-22). The travel way is redundant (C-D provides better administrative access) and is generally revegetated (see photos KC-29-20,24). It should be closed to mechanized use.
- The travel way depicted on Last Chance Canyon and Mustang Point Quads (T34N, R14 W, Section 1) off of BLM Route 1002 and immediately west of Red Rock Knoll begins as a heavily eroded spur (photos KC-29-5,6,7) and abruptly ends in a wash. Beyond the wash the abandoned route is completely revegetated and should be closed to all mechanized use to protect Monument values.
- The travel way depicted on the BLM map (USDI, BLM, 2000) and Last Chance Canyon Quad (T35N, R14W, Section 36) could not be located.
- A-B (Olaf Knolls Quad; T35N, R14W, Section 26), depicted on the quad but not the BLM map, is an abandoned or little used travel way and should be closed to protect Monument values (see photos KC-29a-22,24).

5) *Non-Wilderness Cherry Stems*

- Hudson Point (Westview) Road (T35N, R13W, sections 30 and 29) provides access to the spectacular view west of the Upper Grand Wash Cliff and is proposed as an approximately 1.75-mile cherry-stem.
- BLM Route 1002 from it junction with BLM Route 1050 (see the "Other Recommended Travel Way Closure" section) to its terminus at the Grand Wash Cliffs

Wilderness Trailhead is proposed as an approximately 6.5 miles cherry-stem to provide access to the trailhead (T35N, R14W, Section 26).

¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

² Wilderness Act, Section 2(c).

³ The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

⁴ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁵ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

GRAND WASH CLIFFS



1. Photo KC-13-1; T36N, R13W, Section 16; looking east; travel way "Y" washed out and impassible to 4X4.



2. Photo KC-13-2; T36N, R13W, Section 16; looking east; travel way "Y" washed out and impassible to 4X4.



3. Photo KC-13-4; T35N, R13W, Section 8; erosion on travel way "X." This travel way should be closed to mechanized travel and stabilized.



4. Photo KC-13-5; T35N, R13W, Section 8; Travel way "X" is substantially unnoticeable and completely revegetated. This abandoned travel way should be closed to mechanized travel .



5. Photo KC-13-3; T35N, R13W, Section 8; erosion on travel way "X at its junction with 1071.



6. Photo KC-13-7; T35N, R13W, Section 7; travel way "Z" ends at wildlife water catchment, beyond which it is completely revegetated and substantially unnoticeable.

GRAND WASH CLIFFS (Cont.)



7. Photo KC-13-8; T35N, R13W, Section 7 wildlife water catchment at the end of travel way "Z."



8. Photo KC-13-9; T35N, R13W, Section 7; junction of travel way "Z" with 1071. Access to the wildlife catchment is substantially unnoticeable and should be closed to mechanized travel.



9. Photo KC-29-1; T35N, R14W, Section 26; looking southeast (130°) toward Red Rock Knoll (upper left) and Mustang Point. The Grand Wash Wilderness addition is rugged and natural,



9. (cont.) KC-29-4; consisting of rolling hills and incised washes and scattered pinon and juniper woodlands at higher elevations. These characteristics, along with lack of significant human intrusions, all add to this area retaining its overall wilderness character.



10. Photo KC-29-9; T35N, R14W, Section 1; looking northeast toward Upper Grand Wash Cliffs. Scenic and natural appearing with ample opportunities for solitude and primitive and unconfined types of recreation within the rugged topography of the proposed addition to the Grand Wash Cliffs Wilderness.



11. Photo KC-29-10; T34N, R14W, Section 12; travel way C-D at C.

GRAND WASH CLIFFS (Cont.)



12. Photo KC-29-12; T34N, R13W, Section 7; view toward southeast looking at Red Rock Knoll. The area is scenic and natural appearing with ample opportunities for solitude and primitive and unconfined types of recreation within the rugged topography of the proposed addition to the Grand Wash Cliffs Wilderness.



13. Photo KC-29-14; T34N, R14W, Section 7; travel way C1-C2 at C1 vanishes in dense vegetation. It is substantially unnoticeable.



14. Photo KC-29-16; T34N, R14W, Section 7; erosion on travel way C1-C2 . The travel way should be closed to mechanized travel and stabilized.



15. Photo KC-29-13; T34N, R14W, Section 7; travel way C1-C2 at C1. The travel way is generally revegetated and indicates little, if any, recent use.

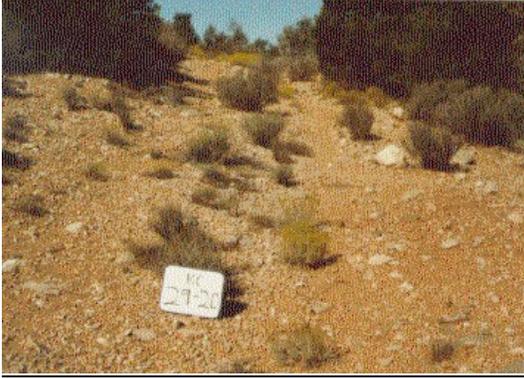


16. Photo KC-29-18; T34N, R13W, Section 6; water trough at the end of travel way C-D.



17. Photo KC-29-19; T34N, R13W, Section 6; travel way C-D is little used and could easily be restored to a natural condition.

GRAND WASH CLIFFS (Cont.)



18. Photo KC-29-20; T34N, R13W, Section 7; 280 degrees; travel way D1-D2, an abandoned route that is largely revegetated. It should be closed to mechanized travel.



19. Photo KC-29-22; T34N, R13W, Section 7; 240° view shows that travel way D1-D2 at its terminus is revegetated.



20. Photo KC-29-23; T34N, R13W, Section 7; 110° view of travel way D1-D2 at its junction with 1002.



21. Photo KC-29-24; T34N, R13W, Section 12; D1-D2, as evidence by the established vegetation along its entire course, should be considered abandoned.



22. Photo KC-29A-22; T35N, R14W, Section 26; travel way A-B at A, is largely revegetated and substantially unnoticeable.



23. Photo KC-29A-18; view toward Hudson Point in the east. The area is natural in appearance and offers outstanding opportunities for solitude and primitive and unconfined types of recreation.

GRAND WASH CLIFFS



24. Photo KC-30-2; T34N, R14W, Section 12; view is toward the west of the junction of travel way A-B with BLM Route 1002.



25. Photo KC-30-3; T34N, R14W, Section 12; view toward the northwest as A-B quickly disappears in dense vegetation.



26. Photo KC-30-5; T34N, R14W, Section 10; view toward the east of travel way C-D at its junction with 1002.



27. Photo KC-30-6; T34N, R14W, Section 10; view toward the northeast of travel way C-D as it fades in well-established grassland. The travel way is largely revegetated and is substantially unnoticeable.

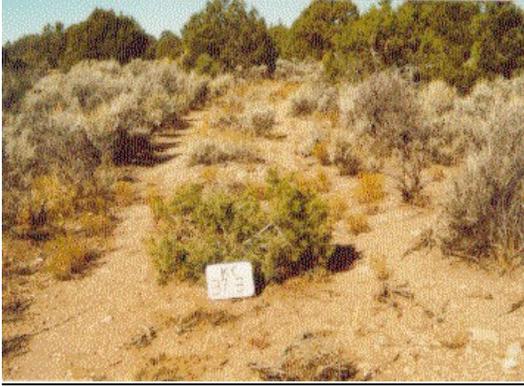


28. Photo KC-36-24; T33N, R12W, Section 6; view toward the northwest of the junction of travel way K-E at "E" (1002). The travel way lies in soft soils and is easily subject to tire ruts and consequent erosional problems.



29. Photo KC-37-2; T34N, R13W, Section 36; View toward the west and includes Azure Ridge (Proposed Million Hills Wilderness) in the distance. The area is scenic and natural appearing with ample opportunities for solitude and primitive and unconfined types of recreation.

GRAND WASH CLIFFS (Cont.)



30. Photo KC-37-3; T34N, R13W, Section 36; view toward the northwest of a largely revegetated section of travel way K-E.



31. Photo KC-37-4; T34N, R13W, Section 36; View toward the west includes Pigeon Canyon and Mustang Point. The area is scenic and natural appearing with ample opportunities for solitude and primitive and unconfined types of recreation within its canyons.



32. Photo KC-37-5; T34N, R13W, Section 25; view toward the east of K-E. Encroaching woodland indicates the travel way show evidence of little use.



33. Photo KC-37-6 T34N, R13W, Section 26; view toward the northwest shows the vegetated nature of travel way K-E. The route is substantially unnoticeable.



34. Photo KC-37-7; T34N, R13W, Section 23; view toward the south. Reestablished grasses indicate that travel way K-E is abandoned. It should remain closed.



35. Photo KC-37-23; T34N, R13W, Section 20; View toward the north consists of Hudson Point and adjacent lowlands. The area is scenic and natural appearing with ample opportunities for solitude and primitive and unconfined types of recreation within it diverse, rugged topography.

GRAND WASH CLIFFS (Cont.)



36. Photo KC-37-24; T34N, R13W, Section 20; View toward the southeast includes vistas of Pigeon Canyon and Mt. Dellenbaugh. The area is scenic and natural appearing with ample opportunities for solitude and primitive and unconfined types of recreation within the canyons, hills and other rugged topography.



37. Photo KC-31-8; T34N,R13W, Sections 30,19; Upper Grand Wash Cliffs; The area is scenic and natural appearing with ample opportunities for solitude and primitive and unconfined types of recreation.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Hidden Canyon Wilderness (10,594 acres; Quads: St. George Canyon, Poverty Springs and Last Chance Canyon).

Summary:

The Arizona Wilderness Coalition recommends the 10,594-acre proposed Hidden Canyon Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that BLM's wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory concludes that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The area consists of the 1979 Intensive Inventory Unit 1-116 (Nutter, 6,835 acres) and an unnamed roadless unit (approximately 3,000 acres) to the south. Since the unit's the eastern Hidden Canyon escarpment dominates the region, we propose the name "Hidden Canyon" for the area. Rugged, 1,400-foot escarpment and dense pinyon and juniper woodlands comprise the proposed Hidden Canyon Wilderness. It is home to mule deer, mountain lions, raptors and other desert and woodland species.

B. Historical Review and Critique of the 1982 WSA Decision Process

Hidden Canyon (Unit 116, Nutter) was describe by BLM in 1980 as "rugged" and "natural," but was dropped from further wilderness consideration due to several impacts, its size and configuration (USDI, BLM, 1980 Decision Report):

Much of the most rugged portion of the unit has remained natural while the flatter areas have been disturbed. These disturbances include a chaining, water developments, roads and ways (USDI, BLM, 1980 Decision Report).

The recent citizen's wilderness inventory did not locate any water developments or evidences of chaining that would preclude wilderness designation (see discussion below). The BLM reported a "road and part of the southern boundary" creating a "narrow finger" of land one-eighth of a mile wide resulted in a decision to reduce the unit to below 5,000 acres (USDI, BLM, 1980 Decision Report). While the agency stated that "according to BLM policy, the narrow finger left by this situation may be dropped from further review," current policy does not support this conclusion.

Hidden Canyon's configuration continued to bother the agency:

The rest of the unit is also narrow," the agency stated, "and does not have sufficient topographic and vegetative screening to provide outstanding opportunities for solitude (USDI, BLM, 1980 Decision Report).

Hidden Canyon's narrow configuration should not preclude wilderness consideration. BLM policy states that "[t]he fact that non-wilderness activities or uses [outside the unit] can be seen or heard from areas within the inventory area shall not be considered when analyzing an area's manageability as a WSA" (USDI 2001 [H-6310-1, Section .2(B)(4), page 24]). The agency should give "consideration of only whether factors which influence a person's opportunity to avoid the sights, sounds, and evidence of other people **in** the inventory unit, rather than evaluate opportunity for solitude in comparison to human habitation" (emphasis added; USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(a), page 15]). While much of Hidden Canyon consists of gently rolling woodlands, current policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). Policy also instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Finally, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

In summary, current BLM policy supports, not detracts from Hidden Canyon's wilderness suitability. In any event, our citizen's inventory demonstrated that the unit's narrow configuration (four-tenths of a mile at its most slender segment) did not preclude wilderness suitability.

B. AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed 10,594-acre Hidden Canyon wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Hidden Canyon Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). It's woodlands, intricate drainages, escarpments and size creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other woodland avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Hidden Canyon's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). These impacts consist of two abandoned travel ways (C-D and K-KI) and are in fact "substantially unnoticeable" (see photos KC-10-7; KC-11-26,27).

The principal proposed "road" closures within the proposed wilderness consists of one little-used, probably abandoned primitive travel ways (A-B). This travel way should be closed to vehicular access and stabilized to protect Monument values. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.² Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)³, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁴, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Hidden Canyon Wilderness' size, and terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM to reconsider Hidden Canyon's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Billy Goat Peak's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including... numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument."

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran, Mojave and Great Basin floristic provinces ...a distinctive and remarkable feature
- Riparian corridors...allowing wildlife movement and plant dispersal

3) Proposed Boundary

Beginning in the unit's northwest section at the junction of BLM Routes 1034 and 1059 (St. George Quad; T37N, R12W, Section 35); then in a easterly direction along 1059 to its junction with travel way I-I1 (southwest of Shoe Buckle Reservoir); then in a southerly direction along I-I1 to its intersection with the Monument boundary in Section 12 at point "I1"; then continuing in a southerly direction along the Monument boundary to its intersection with BLM Route 1039 (Monument boundary); continuing in a

southerly direction along 1039 to its junction with travel way K1-J at "J" (Poverty Springs Quad; T36N, R12W, Section 30; excluding Pumphouse Storage Tank); then along travel way K1-J in a westerly direction to the Hidden Canyon rim (Section 31); then along the rim to its intersection with 1039 (T36N, R12W, Section 32); then crossing the Monument boundary along 1039 in a southerly direction to its junction with State Route 103 near M&M Pond (T35N, R12W, Section 15); then along 103 in a southwesterly direction (bypassing to the north an impacted woodcutters camp in Section 22) to its junction with BLM Route 1003 near Head of Hidden Pond (Poverty Springs Quad; T35N, R12W, Section 28); then along 1003 in a northerly direction to its junction with BLM Route 1034 (St. George Canyon Quad; T36N, R13W, Section 15); then continuing in a northerly direction along 1034 to its junction with BLM Route 1059 (St. George Quad; T37N, R12W, Section 35).

4) Travel Way Closures

- C-D (Poverty Spring quad; T35N, R12W, section 4) is a short (0.25 mile) "road to nowhere" used by woodcutters. It is largely revegetated (photo KC-11-25), substantially unnoticeable (photos KC-11-26) and should be closed.
- A-B (Poverty Spring quad; T36N, R12W, section 32; and T35N, R12W, section 5) is a one-mile route depicted on the 2000 BLM map and the quad. The route is generally revegetated (photo KC-11-27), substantially unnoticeable (photos KC-10-1, KC-11-27), steep and susceptible to erosion (photo KC-11-14), and provides no access to tanks or grazing structures. It should be closed. This action allows an extension of the proposed WSA to the south.
- K-K1 (St. George Canyon Quad; T36N, R13W, Section 24); travel way is depicted on the BLM map and the St. George Canyon and Poverty Springs Quad, but is difficult to discern on the ground (photo KC-10-7). It appears abandoned and provides redundant access to route I-K-J. It should be closed to protect Monument values.

¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

² The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

³ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁴ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor

vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

HIDDEN CANYON



1. KC-10-1; Poverty Springs Quad, T36N, R12W, Section 32; view toward the south of the junction of travel way A-B with BLM Route 1039. The travel way is difficult to discern and quickly fades.



2. KC-10-7; St. George Canyon Quad, T36N, R13W, Section 24; view of travel way K-K1. The route appears abandoned.



3. KC-11-14; Poverty Springs Quad, T35N, R12W, Section 5; view toward the southeast of travel way A-B. The travel way is largely revegetated and indicates little, if any use.



4. KC-11-25; Poverty Springs Quad, T36N, R12W, Section 33; travel way C-D is revegetated and appears abandoned. A "road to nowhere."



5. KC-11-26; Poverty Springs Quad, T35N, R12W, Section 4; view toward the northeast of travel way C-D. The route appears abandoned.



6. KC-11-27; Poverty Springs Quad, T36N, R12W, Section 5; view toward the southwest of travel way A-B. This section appears abandoned.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Hidden Hills Proposed Wilderness (22,808 acres; Quads: St. George Canyon; Last Chance Canyon; and Poverty Springs).

Summary:

The Arizona Wilderness Coalition recommends the 22,808-acre Proposed Hidden Hills Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The 22,808-acre Proposed Hidden Hills Wilderness consists of picturesque woodland hills and incised, intricate canyons and other drainages of pinyon and juniper forests (photo HH-1).

B. Historical Review of the 1982 WSA Decision Process

The area inventoried consists of old Intensive Inventory Hidden Wash Unit (1-110; 19,950 acres) as well as a 6,000-acre area (between Last Chance Canyon and Rattlesnake Canyon) not previously evaluated. The principal "Hidden Wash" area was dropped from further wilderness consideration because of the "cumulative effect" of "water developments, several miles of roads and ways, and several miles of bulldozed fence line" (USDI 1980).

C. AWC Recommendation

While we acknowledge some of the impacts described in the 1980 Proposal Report (USDI 1980), we do not concur that the area lacks sufficient wilderness character for wilderness consideration. Based on the new information presented below, the AWC believes the proposed Hidden Hills Wilderness should be further evaluated for interim protection as a WSA. The "roads and ways" issue is discussed in detail below. The "several miles of bulldozed fence line" forms the unit's boundary and therefore lies outside of the proposed wilderness. The area's major water developments (Rattlesnake Springs, T35N, R13W, Section 3; an earthen tank along BLM Route 1054 in Section 21; a steel tank in Section 33; and the "Head of Hidden Pond, T35N, R12W, Section 28) lie outside the wilderness proposal. The semi-trailer tank along F-G (photo KC-11-21, T35N, R12W, Section 16) lies approximately 1/4 mile inside the proposed boundary. It is not a permanent feature and could be moved. Two small troughs (Coin Springs, photo KC-11-7, T35N, R13W, Section 36; and one located along travel way K-L, photo KC-13-20, Section 20) are "substantially unnoticeable." Access to these two troughs is addressed below as part of a minimum requirement process.

1) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed 22,808-acre Hidden Hills wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Hidden Hills Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos HH-1,3). It's expansive woodlands, intricate drainages, grasslands and size creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other woodland avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Hidden Hills' human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). These consist of three abandoned travel ways (D-D1, A1-D2, and E-J) and are in fact "substantially unnoticeable" (see photos KC-11-1,2; KC-13-23,25). Two largely revegetated and little-used routes recommended for closure (B1-H1-H, and B2-B4), form the proposed boundary.

The principal proposed "road" closures within the proposed wilderness two little-used primitive travel ways (A-B [Dry Canyon] and K-L), and two severely eroding and impacting routes (Coin Springs and a section of BLM Route 1054 [Rattlesnake Canyon road]). These travel ways should be closed to vehicular access and stabilized to protect Monument values. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.² Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)³, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁴, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Hidden Hills Wilderness' size, terrain variation ranging from the softly undulating juniper and pinyon forests to rugged canyons contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos HH-1,3). Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Hidden Hill's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

- **b) A geological treasure**, including
- recent sinkholes and breccia pipes
- fossils including invertebrate fossils.
- portions of geologic faults.

c) Important watersheds for the Colorado River and the Grand Canyon...

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors... allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

3) Proposed Boundary

Beginning in the unit's northwest corner, the proposed boundary begins at the junction of the Hidden Canyon Road (BLM Route 1003) and BLM Route 1071 (Last Chance Canyon Road; St. George Canyon quad; T36N, R13W, Section 16) and along 1003 in an easterly and southerly direction to its junction with H1-H at "Head of Hidden Pond," one-quarter mile west of the 1003-State Route 103 junction (Poverty Springs Quad; T35N, R12W, section 28); then in an easterly direction following the H1-H portion of the B1-H1-H route from point "H" in the east to the bulldozed fenceline at the top of sections 25 and 26 (Last Chance Quad; T35N, R13W), and then westerly along the fenceline to the rim of Dry Canyon in the north-west corner of section 26; then in a southerly and then westerly direction along travel way B1-B2-B3 to its junction with BLM Route 1071 at B3 (Last Chance Canyon Quad; T35N, R 13W, Section 33, southeast corner at BM 6528); then in a westerly and then northerly direction along 1071 to its junction with BLM Route 1003 (Last Chance Canyon Road; St. George Canyon quad; T36N, R13W, Section 16).

4) Travel Way Closures

- Coin Springs (Last Chance Canyon quad, T36N, R13W, Section 36); a little-used (see photo KC-11-6) travel way providing access to Coin Springs. A permanent house trail is located along this route approximately 50 yards from BLM route 1003 and lies outside the wilderness proposal. This 0.75-mile route severely impacts the wash (see photo KC-11-9). In addition, cattle have damaged a fence protecting a small riparian area of free-flowing water and the vicinity of the catchment (photo KC-11-9). The route should be closed to mechanical travel, stabilized with primitive waterbars and drainage berms, and restored to a natural condition.

- Dry Canyon (A-B; Last Chance Canyon quad, T36N, R13W, section 36; and T35N, R13W, sections 2,11,14,13,23,26, and 34), a 9.1 mile travel way indicating little, if any, recent maintenance, and for most of its length, infrequent use (photo KC-12-27). The 2000 BLM map does not show this route in Lower (northern) Dry Canyon and indicates a jeep trail in the upper reaches. The quad indicates a short (0.6-mile) road in the lower reaches, and approximately 2.5 miles of travel way in the southern highlands. Much of the central route is generally revegetated, with erosional problems and minor traffic indications in the northern lower sections and in its southern-most reaches (photos KC-11-4,5). The route does not appear to access stock tanks, and continued use impacts vegetation, wildlife and soils. The entire travel way should be closed to protect Monument values.
- F-G (Poverty Spring quad, T35N, R12W, sections 16,17,18 and Last Chance Canyon quad, T35N, R13W, sections 13,24, and 25), 4.5 mile route, with the exception of the eastern 0.25 miles to a semi-trailer water tank (photo KC-11-21), appears abandoned (photos KC-11-18,20,23). Significant erosion persists in some sections (photos KC-11-17,19,22). These sections should be stabilized with primitive waterbars and earthen drainage berms. The travel way should remain closed to all mechanized use.
- B1-H1-H (Poverty Spring quad, T35N, R12W, sections 19,20,28-29, and 30; Last Chance Canyon quad, T35N, R13W, sections 25 and 26) a 4.65-mile segment that forms the southern proposed wilderness boundary. The travel way is largely revegetated and indicates little, if any use except for the eastern mile. It is indicated on the 2000 BLM map as a jeep trail. It should be closed to protect Monument values such as soil, vegetation, and wildlife.
- B2-B4 (Last Chance quad, T35N, R13W, sections 26,35,34, and 33) is a one-mile segment that comprises part of the southern boundary of the Hidden Hills proposed wilderness. It disappears 0.5 miles north of B4. There is a trick tank located approximately 0.1 miles north of B4. The entire route from the tank to B2 should be closed to mechanized transport to protect Monument values.
- D-D1, located approximately 2.2 miles north of the BLM route 1071 junction on the southern Rattlesnake Canyon Road (BLM Route 1054; T35N, R13W, sections 21,22) this quarter-mile route is not indicated on the 2000 BLM map, but is depicted as forking one mile jeep trail network on the quad. The route is completely unused and revegetated (photo KC-13-27) and enters an extensive burn area where the travel way disappears (photo KC-13-25). The entire route should be closed to mechanized use to protect Monument values.
- A1-A2 (Last Chance quad; T35N, R13W, sections 23 and 13), a 1.1-mile route depicted on the 2000 BLM map and the quad as a jeep trail, is revegetated (photos KC-11-1,2) with microbial crust establishment and presented no evidence of use. The route should be closed to all mechanized use to protect Monument values.
- E-J (Last Chance Canyon quad; T35N, R13W, sections 16,20, and 21) is a two-mile travel way depicted on the 2000 BLM map and the quad as a jeep trail. The route's eastern junction at Rattlesnake Canyon Road (BLM Route 1054) is completely revegetated and shows no sign of use (photo KC-13-23). Its western junction with the Last Chance Canyon road (BLM Route 1071) could not be located. The route should be administratively closed to all mechanized travel.

- K-L (Last Chance Canyon quad; T35N, R13W, sections 9,17 and 20) is a 2.3 mile travel way depicted on the 2000 BLM map and the quad as a jeep trail. The route provides access to a watering trough (photo KC-13-20) located halfway to Last Chance Canyon road (BLM Route 1071). While its junction with 1071 and Rattlesnake Canyon road (1054) is conspicuous (photo KC-13-16) with some sections significantly eroded (photo KC-13-15), most of the travel way is generally revegetated (photos KC-13-14,19,21). We suggest closing the route to all mechanized transport and restoring it to a natural condition. The water trough can be moved to the fence line just west of K-L's junction with Rattlesnake Canyon road, and a supplemental tank can be placed at it's junction at Last Chance Canyon road; or the existing tank could be refilled using stock.

5) *Cherry Stems*

Rattlesnake Canyon Road (BLM Route 1054; Last Chance Quad, T35N, R13W, sections 33,28,21,16,9,4, and 3; T36N, R13W, sections 34,27, and 26), is a 9.8-mile route providing access to stock tanks in section 21 (T35N, R13W) and at Rattlesnake Springs. The route appears on the 2000 BLM map, but the southern two miles is not depicted on the 1971 quad where the 2.5-mile northern portion appears as a road and the remainder as a jeep trail. The route is in generally good shape (high clearance trucks can pass) with the notable exception of a 1.8-mile section between junction "K" and the corral at Rattlesnake Springs. Here the route enters the main wash and is severely eroded, with two locations that currently are impassible to 4X4 (see photo KC-13-1). The segment's location within an active, large drainage assures that the erosion problem will persist regardless of maintenance activities. We suggest administratively closing this severely eroded section permanently from Rattlesnake Springs (T35N, R13W, Section 3) north to the stock tank and corral in the southeastern corner of Section 16 (BM 6143). This action would allow access to the two stock corrals in Rattlesnake Canyon through two non-wilderness corridors (see discussion of travel way K-L water trough) .

¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

² The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

³ "Definition of Wilderness ," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁴ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor

vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area

HIDDEN HILLS PHOTO LOG



1. KC-11-1; Last Chance Canyon Quad; T35N, R13W, Section 23; travel way A1 approximately 100 feet north of junction A1.



2. KC-11-2; Last Chance Canyon Quad; T35N, R13W, Section 23; ravel way A-B (on left) junction with A1. A1 is abandoned and A-B (Dry Canyon) shows little evidence of use.



3. KC-11-4; Last Chance Canyon Quad; T35N, R13W, Section 11; travel way A-B 3.3 miles from junction "A," shows little evidence of use.



4. KC-11-5; Last Chance Canyon Quad; T35N, R13W, Section 11; travel way A-B (Dry Canyon) 2.2 miles from junction "A," looking south, shows a largely revegetated, little-used route.



5. KC-11-6; Last Chance Canyon Quad; T36N, R13W, Section 36; junction of Coin Springs travel way with BLM Route 1003, view to the southwest; shows a little-used, largely revegetated beginning of the travel way.



6. KC-11-7; Last Chance Canyon Quad; T36N, R13W, Section 36; Coin Springs trough.

HIDDEN HILLS PHOTO LOG (Cont.)



7. KC-11-9; Last Chance Canyon Quad; T36N, R13W, Section 36; Coin Springs travel way. The view is toward the east and shows the impacts of a past bulldozing



8. KC-11-17; Last Chance Canyon Quad; T35N, R13W, Section 24; travel way F-G. View of entrench erosion impacting F-G.



9. KC-11-18; Poverty Springs Quad; T35N, R12W, Section 17; travel way F-G. View is toward the west and shows a generally revegetated, little-used travel way with imprints of man substantially unnoticeable.



10. KC-11-19; Poverty Springs Quad; T35N, R12W, Section 17; travel way F-G. View is westward and shows erosional impacts associated with the travel way.



11. KC-11-20; Poverty Springs Quad; T35N, R12W, Section 17; travel way F-G. View is westward and shows a largely revegetated, little-used travel way that is substantially unnoticeable.



12. KC-11-21; Poverty Springs Quad; T35N, R12W, Section 16; travel way F-G. Movable water tank approximately 1/4-mile west of BLM Route 1003.

HIDDEN HILLS PHOTO LOG (Cont.)



13. KC-11-22; Poverty Springs Quad; T35N, R12W, Section 16; travel way F-G. View is toward the southwest and shows erosional problems associated with use of the travel way.



14. KC-11-23; Poverty Springs Quad; T35N, R12W, Section 16; travel way F-G at its junction with BLM Route 1003. View is toward the southwest and shows a little-used, largely revegetated travel way that is substantially unnoticeable.



15. KC-12-27; Last Chance Canyon Quad; T35N, R13W, Section 23; travel way A-B (Dry Canyon). View is toward the east and shows a little-used travel that could easily be restored to a natural condition through closure to mechanized use.



16. KC-13-13; Last Chance Canyon Quad; T35N, R13W, Section 3; this section of BLM Route 1054 (Rattlesnake Canyon) is impassable to 4X4 vehicles. Its location in a large, active drainage assures continual maintenance problems and Monument resource impacts.



17. KC-13-14; Last Chance Canyon Quad; T35N, R13W, Section 9; travel way K-L. View is of a largely revegetated, little-used travel way, generally unnoticeable, that should be closed to mechanized travel to protect monument values.



18. KC-13-15; Last Chance Canyon Quad; T35N, R13W, Section 17; travel way K-L. View is toward the southwest and shows a significant erosional problem associated with keeping the travel way open.

HIDDEN HILLS PHOTO LOG (Cont.)



19. KC-13-16; Last Chance Canyon Quad; T35N, R13W, Section 20; travel way K-L. View shows the travel way's junction with BLM Route 1071. The route is little-used and closure to mechanized access would quickly restore the impacts to a natural condition.



20. KC-13-19; Last Chance Canyon Quad; T35N, R13W, Section 17; travel way K-19. View is toward the southeast and shows the largely revegetated, little-used condition of the travel way.



21. KC-13-20; Last Chance Canyon Quad; T35N, R13W, Section 17; travel way K-L. Water trough that could be move closer to either BLM Route 1054 or 1071, or maintained and re-supplied at its current location thorough non-mechanized means (packstock).



22. KC-13-21; Last Chance Canyon Quad; T35N, R13W, Section 9; travel way K-L. The view is toward the west and shows a largely revegetated, little-used travel way that should be closed to protect Monument values.



23. KC-13-23; Last Chance Canyon Quad; T35N, R13W, Section 16; travel way E-J. This travel way is completely revegetated and restored to a natural condition. It should remain closed.



24. KC-13-25; Last Chance Canyon Quad; T35N, R13W, Section 21; travel way D-D1. This travel way is abandoned and is substantially unnoticeable. It should remain closed to protect Monument values.

HIDDEN HILLS PHOTO LOG (Cont.)



25. KC-13-27; Last Chance Canyon Quad; T35N, R13W, Section 21; travel way D-D1. This abandoned travel way is completely revegetated, substantially unnoticeable, and should remain closed to protect monument values.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Hidden Rim Proposed Wilderness (17,519 acres; Quads: St. George Canyon; Cane Springs SE).

Summary:

The Arizona Wilderness Coalition recommends the 17,519-acre Proposed Hidden Rim Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit (former Hidden Rim WSA, Unit 119; 16,563 acres) was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Hidden Rim Wilderness contains spectacular sections of the Upper Grand Wash Cliffs, Hidden, Jump, and St. George Canyons. The plateau lands consist of rolling hills of grasslands and pinyon-juniper woodlands separated by open drainages. Lower Jump Springs provides a luxuriant example of a desert springs environment free from grazing impacts.

B. Historical Review of the 1982 WSA Decision Process

The proposed Hidden Rim Wilderness consists of the old Hidden Rim WSA (1-119; 16,563 acres). In 1982, the BLM stated that "[v]egetation below the cliffs provides good screening and, when combined with topography, offers an **outstanding opportunity for solitude**" (emphasis added; USDI, BLM, 1982, EIS:53). In addition, the BLM emphasize that:

*Hidden Rim WSA has **outstanding opportunities** for hiking, photography, and plant and geologic sighting [primitive and unconfined or primitive type of recreation]....The rim offers excellent photographic vistas [and] [t]he limestone cliffs and sloping Hermit shale of the Upper Grand Wash Cliffs and Supai sandstone below provide interesting and colorful rocks and erosion forms for geologic study (USDI, BLM, 1982, EIS:53. Emphasis added).*

While Hidden Rim's experiential wilderness characters are obviously superior, the BLM qualified its endorsement by noting "these opportunities are limited to the rim of the Upper Grand Wash cliffs, the cliffs, and the area below the cliffs"(USDI, BLM, 1982, EIS:53) and not the plateau. Earlier BLM requirements that not only the traditional wilderness characteristics (size, naturalness, outstanding opportunities for solitude or primitive and unconfined recreation, and other supplemental values) required consideration, but also "**the unit's potential for returning to its natural condition if there had been human activity in the unit,**" that is its potential for restoration, would be considered (emphasis added; USDI, BLM, 1979, Preliminary Findings, page 3). Perhaps with this requirement in mind, agency staff noted that the

burning of a large area above the cliffs [the plateau] has temporarily eliminated vegetation screening and reduce opportunities for solitude....[but] [w]ith the return of juniper and pinyon to this portion of the unit, opportunities for solitude are expected to be outstanding (USDI, BLM, 1982, EIS:53).

In addition, the BLM acknowledged that the plateau contained "some human imprints, including several ways and range developments....[but] [t]hese developments, however, are largely unnoticeable, and the unit appears to be natural" (USDI, BLM, 1982, EIS:53). Obviously the Hidden Rim's plateau met BLM's existing wilderness character criteria. In any event, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). The AWC submits that the agency's 1982 conclusions should have supported, not precluded, wilderness designation.

In 1982, the BLM recommended the entire unit as nonsuitable for wilderness designation (USDI, BLM, 1982, EIS:21). "The unit lacks high-quality wilderness characteristics and has an undesirable configuration due to two cherrystem roads dividing the unit into three segments (USDI, BLM, 1982, EIS:21). Current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the unsubstantiated "high-quality" conclusion. The agency's reference to "undesirable configuration" is not explained, and in any event current policy states that a "dead-end (cherry-stem) road ...does not by itself disqualify an area from being considered 'roadless'" (USDI 2001 [H-6310-1, Section .13(A)(3), page 10]).

The BLM's initial (1982) assessment of Hidden Rim's naturalness and outstanding opportunities for solitude or a primitive and unconfined type of recreation unquestionably should have resulted in a recommendation for wilderness designation. The recent citizen's inventory demonstrates that the former Hidden Rim WSA still retains outstanding opportunities for solitude and a primitive or unconfined type of recreation.

C. Preliminary AWC Recommendation

New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

1) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed Hidden Rim Wilderness (17,519 acres) meets the BLM size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity

as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Hidden Rim Wilderness, the answer to both questions is a resounding yes. As concluded in the BLM's 1982 assessment described above and the recent citizen's inventory, the area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos HR-1,3). Its spectacular cliffs, expansive woodlands, intricate drainages, grasslands and size creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other desert avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Hidden Rim's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). These consist of two travel ways (Lower Jump Springs and E-F; described below) and are in fact "substantially unnoticeable" (see photos KC-10-18,19, 23 and 26). One principal proposed "road" closure within the proposed wilderness (D-C) provides redundant access to the rim vista. These travel ways should be closed to vehicular access and stabilized to protect Monument values (see discussion presented below).

AWC maintains that it is reasonable to assume past impacts created by the travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.² Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)³, provides a more permissive standard for designating a wilderness; a second definition, in

section 4(c)⁴, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Hidden Rim Wilderness' size, terrain variation (ranging from the softly undulating juniper and pinyon forests to rugged canyons and cliffs) contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos HR-2,3; KC-10-19). Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Hidden Rim's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- colorful...Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils, including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River and the Grand Canyon....

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.

- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature. This includes a "Mohave Desert plant community [occupying] the lower slopes and Supai bench area...[and] include Joshua trees, yuccas, and agave" (USDI, BLM, 1982, EIS:53). Lower Jump Springs provides a luxuriant example of a desert springs environment free of cattle impacts.
- Riparian corridors...allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

3) Proposed Boundary

Beginning in the northeast corner of the proposed wilderness at the junction of BLM Route 1033 with 1032 (St. George Canyon Quad; T37N, R13W, Section 16); continuing along 1032 in a southerly direction to the junction of BLM Route 1034 in Section 15; then along 1034 in southerly direction to its junction with BLM Route 1003 (St. George Canyon; T36NR13W, Section 15); following 1003 in a westerly direction to its junction with BLM Route 1033 (St. George Canyon; T36N, R14W, Section 2); then following 1033 in a northerly then easterly direction to its junction with BLM Route 1032 (St. George Canyon Quad; T37N, R13W, Section 16).

4) Travel Way Closures

- Travel way "D-C" (T 37 N, R 13 W, sections 28, 29, 32) is depicted on the quad and the 2000 BLM map. This route provides redundant access to the rim vista and should be closed and restored to a natural condition. Agreements for essential maintenance of the tank in Sections 28 (T37N, R13W) can be developed under the BLM's minimum requirement procedures.
- Travel way "E-F" (T 36 N, R 13 W, sections 3,4,5; 2.9 miles) is depicted on the quad and the 2000 BLM map and provides access to a livestock tank and wildlife water catchment. The non-functional wildlife catchment (T36N, R13W, Section 5; see photo KC-10-24) is in complete disarray and should be removed. A 0.5-mile travel way continuation is depicted on the quad, but this section is revegetated and indicates no recent use (photo KC-10-26). Sections of E-F indicate infrequent use (photo KC-10-23) and the entire travel way should be closed to mechanized travel. Agreements for essential maintenance of the stock tank can be developed under the BLM's minimum requirement procedures.
- Lower Jump Springs travel way (T 37 N, R 14 W, Sections 24, 25 [includes Cane Springs Quad]; 1.0 mile) is completely revegetated (photos KC-10-18,19) and leads to a spring that is free flowing with abundant, mature oak and redbud. The

surrounding terrain appears to be free of grazing activity. This route should remain closed to all mechanized travel.

5) *Cherry Stems*

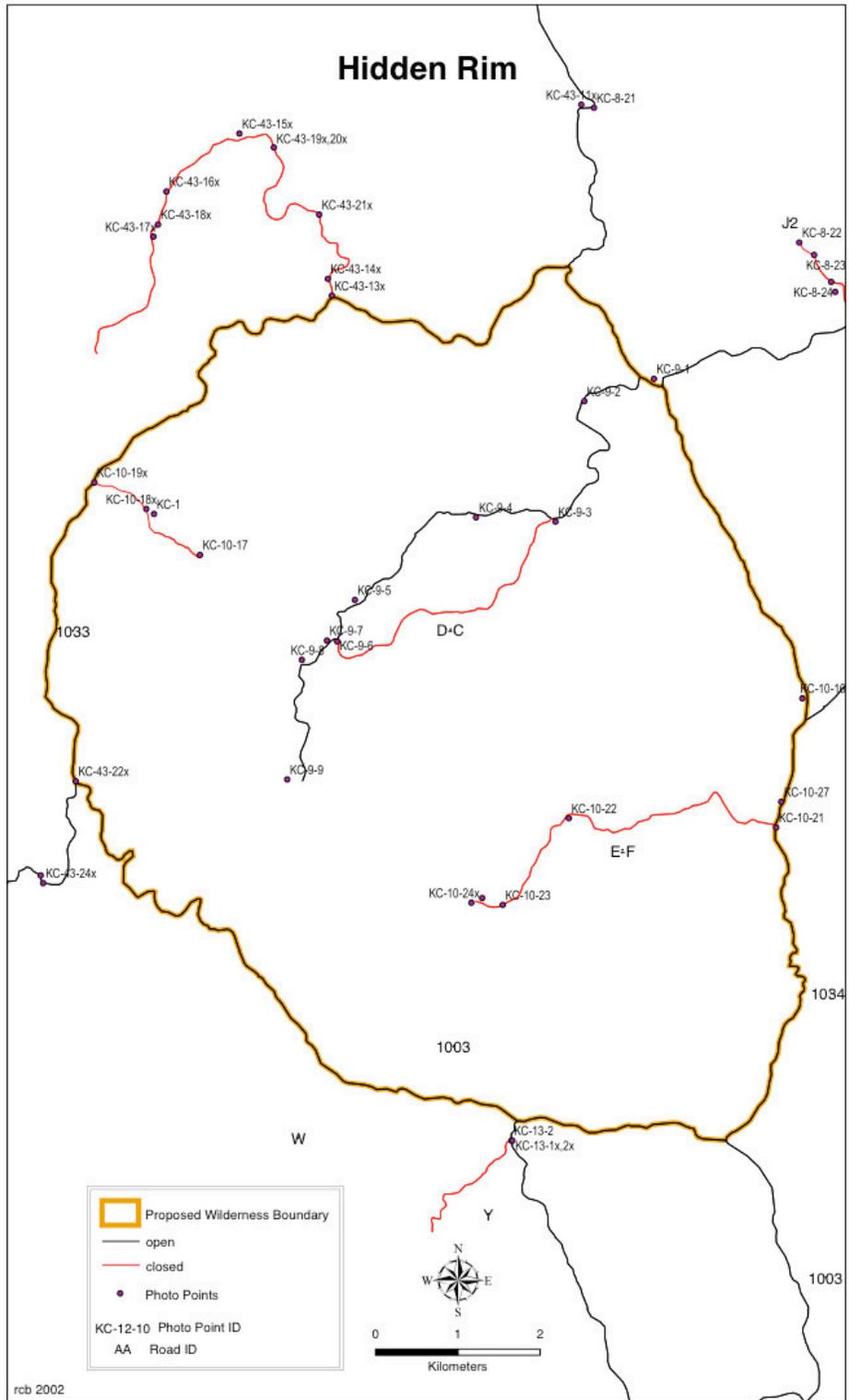
A-B (Tweeds Point Overlook; 5.0 miles; T 37 N, R 13 W, sections 20, 21, 29, 30 and 31) provides access to one of the monuments most stunning vistas, a wildlife water catchment (Section 30), as well a large trick tank in section 29. The road, depicted on the quad and the 2000 BLM map, contains numerous eroding sections, but is generally passable in a high clearance vehicle. The AWC proposes A-B as a non-wilderness "cherry stem" providing vehicular access to the scenic overlook.

¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

² The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

³ "Definition of Wilderness ," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁴ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.



HIDDEN RIM PHOTO LOG



1. KC-10-19; Cane Springs SE; T37N, R14W, Section 24; abandoned Lower Jump Springs travel way. The area is natural appearing with outstanding opportunities for solitude and a primitive or unconfined type of recreation.



2. KC-10-23; ST. George Canyon; T36N, R13W, Section 5; Travel way E-F largely revegetated. Could easily be completely restored to a natural condition through closure to mechanized travel.



3. KC-10-24; St. George Canyon; T36N, R13W, Section 5; Wildlife catchment on TW E-F @ F. The facility is completely nonfunctional and should be removed.



4. KC-10-26; St. George Canyon; T36N, R13W, Section 5; abandoned continuation of travel way E-F @ F has returned to a natural condition.



5. KC-10-18; Cane Springs SE; T37N, R14W, Section 24; View to the south of abandoned Lower Jump Springs travel way; the area is completely revegetated with the imprint of man's work substantially unnoticeable.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Hobbie Canyon Wilderness (12,477 acres) Quads: Mustang Knoll and St. George Canyon).

Summary:

The Arizona Wilderness Coalition recommends the 12,477 -acre proposed Hobbie Canyon Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that the agency inconsistently and incorrectly applied wilderness suitability criteria to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

Hobbie Canyon consists of rugged valleys, rolling hills and escarpments, and scenic vistas. Its expansive pinyon and juniper woodlands include sage grading into blackbrush and grasslands.

B. Historical Review and Critique of the 1982 WSA Decision Process

The BLM described Hobbie Canyon's "[r]olling hills, twisting canyons, and small escarpments...covered primarily with pinyon-juniper and sagebrush...[containing] a few minor developments which do not impact naturalness (USDI, BLM, 1982, EIS:53). While the agency stated "[p]ortions of the unit provide **outstanding opportunities for seclusion [solitude]** in the hill, canyons, and dense pinyon-juniper stands...[t]he unit, however, lacks outstanding opportunities for such primitive recreation as hiking, hunting, backpacking, horseback riding, and sightseeing (USDI, BLM, 1982, EIS:53; emphasis added). The BLM proposed Hobbie Canyon as nonsuitable for wilderness designation:

[t]he Unit offers no outstanding opportunities for primitive and unconfined recreation and meets only the minimum criteria for solitude.... Moreover, the overall wilderness characteristics are not of high quality (USDI, BLM, 1982, EIS:21).

While recent citizen's inventories reported outstanding opportunities for each wilderness-dependant experiential quality, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). In addition, policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the unsubstantiated "high-quality" conclusion. The AWC submits that the agency's 1982 decision regarding naturalness and outstanding opportunities for solitude should have supported, not precluded, wilderness designation.

C. AWC Recommendation

New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

1) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed Hobbie Canyon Wilderness (12,477 acres) meets the BLM size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

In 1982, the BLM stated that Hobbie Canyon WSA contained "a few minor developments which do not impact naturalness" (USDI, BLM, 1982, EIS:53). Recent citizen's surveys support the same conclusion. The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Hobbie Canyon Wilderness, the answer to both questions is a resounding yes (see slide Hob-2). As concluded in the BLM's 1982 assessment described above and the recent citizen's inventory, the area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos HR-1,3). It's scenic escarpments, expansive woodlands, intricate drainages, grasslands creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other desert avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness... which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Hobbie Canyon's human imprints consist primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). These consist of travel ways (J1-J2, K-J, L-L1, Z-T-X, and Y-T-S4) described below and are in fact "substantially unnoticeable." AWC maintains that it is reasonable to assume past impacts created by the travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.² Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)³, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁴, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Hobbie Canyon Wilderness' size, terrain variation (ranging from the softly undulating juniper and pinyon forests to rugged canyons and escarpments) contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos HR-2,3; KC-10-19). In 1982, the agency stated "[p]ortions of the unit provide **outstanding opportunities for seclusion [solitude]** in the hills, canyons, and dense pinyon-juniper stands (USDI, BLM, 1982, EIS:53; emphasis added). Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including outstanding opportunities for primitive recreation as hiking, hunting, backpacking, horseback riding, and sightseeing, contrary to the agency's 1982 negative assessment (USDI, BLM, 1982, EIS:53). The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Hobbie Canyon's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- colorful...Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes

- fossils, including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River and the Grand Canyon....

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature.
- Riparian corridors...allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

3) Proposed Boundary

Beginning in the unit's upper northwest corner at the junction of BLM Route 1007 with State Route 101 (Mustang Knoll; T38N, R13W, Section 20); continuing in an easterly direction along 101 to point "Z" in Section 22 (excluding Imlay Airstrip Wildlife Catchment in Section 23); then in a southerly direction along travel way Z-T to point "T"; then in an easterly direction along travel way T-S3 to point "S3" in section 25; then in a southerly direction bypassing to the west "Imlay Resort Tank and corrals; then along BLM Route 1032 in a southerly direction past its junction with BLM Route 1059 (St. George Quad; T37N, R13W, Section 18); then in a westerly direction along 1032 past its junction with BLM Route 1034 in Section 15; then in a northerly direction along 1032 to its junction with BLM Route 1007 in Section 30(Mustang Knoll; T38N, R13W), excluding on the west the corrals depicted on the quad; then in a northeasterly direction along 1007 to its junction with State Route 101 in Section 20.

4) Travel Way Closures

- J1-J2 is depicted on the St. George Quad and the BLM map (USDI, 2000). It begins as an inconspicuous two-track at its junction with 1032 in Section 14 (T37N, R13W; photo KC-8-26) and quickly fades to become substantially unnoticeable (photos KC-8-22,24). It is a route to nowhere and should be closed.

- K-J is depicted on the Mustang Knoll Quad and the BLM map (USDI 2000). It begins on BLM Route 1032 (T38N, R13W, Section 36) as a two-track and quickly ascends in an eroding steep incline (photos KC-7-10,8,and 6). Much of the route is generally revegetated (photo KC-7-9) and the travel way completely fades in a burn area in Section 2 (T37N, R13W; photo KC-7-7). While the St. George and Mustang Knoll Quads depict the travel way's continuation to travel way J1-J2, the route is completely obscured. K-J is a route to nowhere and should be closed to mechanical travel and restored to a natural condition to protect Monument values.
- L-L1 is depicted on the Mustang Knoll and St. George Quads as a jeep trail. The travel way is blocked at its junction with BLM Route 1032 (T37N, R12W, Section 6; photo KC-7-4) and quickly fades dense pinyon and juniper forest (photo KC-7-2). This route should remain closed to mechanized travel.
- Z-T-X is depicted on the BLM map (USDI 2000) and the Mustang Knoll Quad as a jeep trail. The route is block by a fallen juniper at it junction with State Route 101 (Mustang Knoll Quad; T38N, R13W, Section 22; photo KC-7-21) at point "Z." The abandoned travel way is completely block by a washout near its terminus at BLM Route 1032 (photo KC-7-13; Mustang Knoll Quad; T3N, R13W, Section 35). The travel way is abandoned and is substantially unnoticeable through most of its course (photos KC-7-17 and 24). The route up Hobble Canyon indicated on Mustang Knoll Quad is completely revegetated except for a cow trail (photo KC-7-15; Mustang Knoll Quad; T38N, R13W, Section 35). It should remain closed to mechanized travel to protect Monument values.
- Y-T-S4 is depicted on the BLM map (USDI 2000) and the Mustang Knoll Quad as a jeep trail. It is closed by a fenceline without a gate in Section 22 (T38N, R13W, Section 22) and appears abandoned along most of its way (photos KC-6-2; KC-7-19-27). Numerous sections are severely eroded and should be stabilized with primitive water drainage berms and/or checks (photos KC-6-5, KC-7-26). The travel way forms the northeastern boundary of the proposed Hobble Canyon Wilderness, and should be closed to mechanized travel to protect monument values.

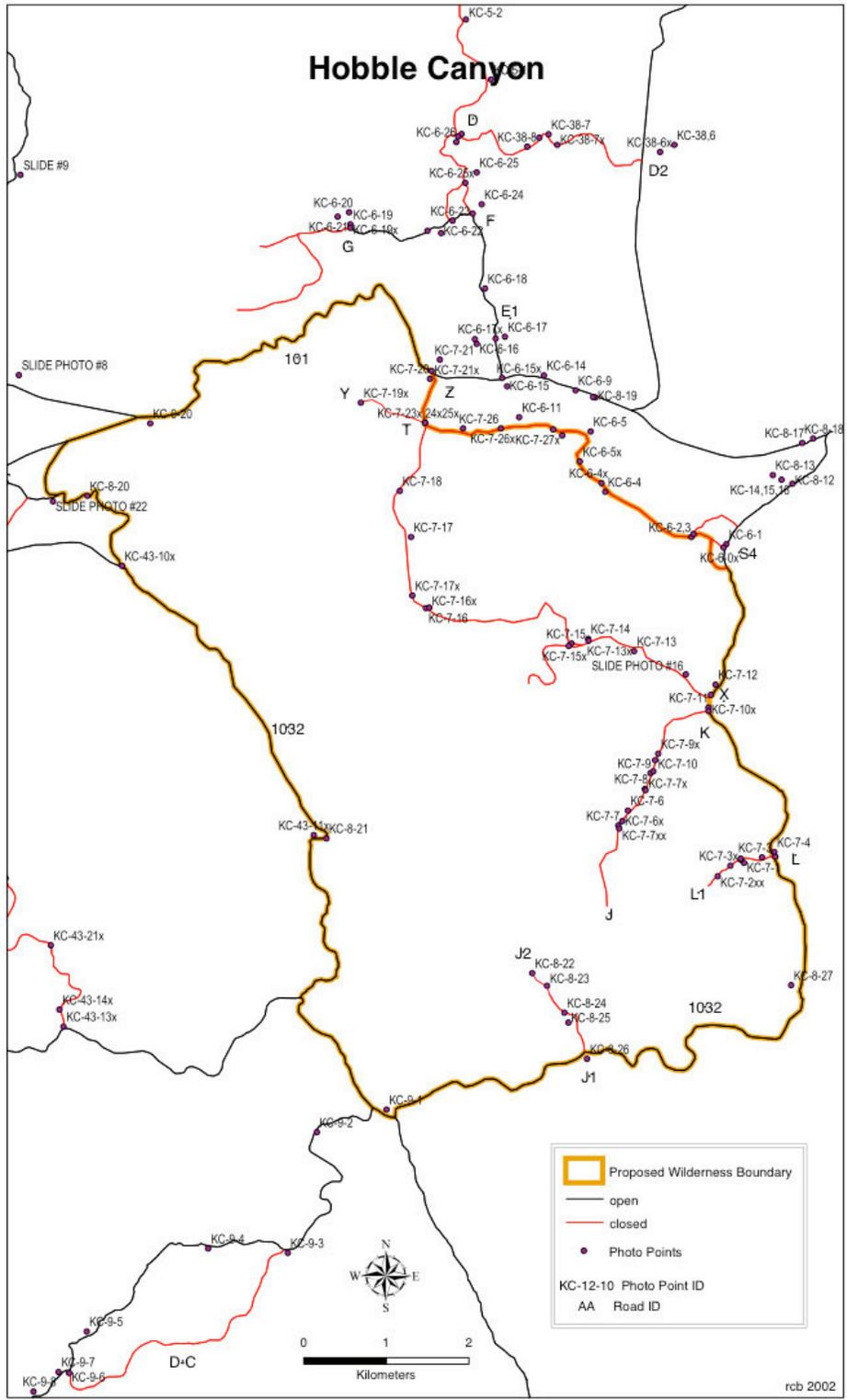
¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

² The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

³ "Definition of Wilderness ," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁴ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the

administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.



HOBBLE CANYON



1. KC-6-2; Mustang Knoll Quad; T38N, R13W, Section 25; view is toward the east showing travel way T-S4 at point S3. This abandoned travel way forms the northeastern boundary of the proposed Hobbble Canyon Wilderness.



2. KC-6-5; Mustang Knoll Quad; T38N, R13W, Section 23; view is toward the southeast and shows an eroding section of travel way T-S4. The route forms the northeastern boundary of the unit and should remain closed to mechanized travel, stabilized and restored to a natural condition.



3. KC-7-2; Mustang Knoll Quad; T37N, R13W, Section 12; view toward the southwest shows travel way L-L1 vanishing in dense pinyon and juniper forest.



4. KC-7-4; Mustang Knoll Quad; T37N, R12W, Section 6; view toward the west shows the junction of travel way L-L1 and BLM Route 1032 blocked by a fallen juniper. The route should remain closed to mechanized travel to protect Monument values.



5. severely eroding section of travel KC-7-6; Mustang Knoll Quad; T37N, R13W, Section 1; view to the east shows a way K-J. This section should be closed to mechanized use and stabilized with primitive water bars and checks.



6. KC-7-7; Mustang Knoll Quad; T37N, R13W, Section 2; View toward the south of travel way K-J fading in a burn area.

HOBBLE CANYON (Cont.)



7. KC-7-8; Mustang Knoll Quad; T37N, R13W, Section 1; view toward the northwest, shows an eroding portion of travel way K-J. This section should be closed to mechanized use and stabilized with primitive water bars and checks.



8. KC-7-9; Mustang Knoll Quad; T37N, R13W, Section 1; view toward the northwest shows a little-used, revegetated section of travel way K-J.



9. KC-7-10; Mustang Knoll Quad; T37N, R13W, Section 1; view to the south shows an eroding section of travel way K-J. This section should be closed to mechanized use and stabilized with primitive water bars and checks.



10. KC-7-13; Mustang Knoll Quad; T38N, R13W, Section 35; view is toward the northeast and shows travel way T-X completely washed out and inaccessible to 4X4 travel.



11. KC-7-15; Mustang Knoll Quad; T38N, R13W, Section 35; view toward the west shows the junction of travel way T-X with Hobble Canyon. The route up Hobble Canyon, while depicted on the quad, is completely revegetated.



12. KC-7-17; Mustang Knoll Quad; T38N, R13W, Section 27; view toward the north shows travel way T-X is revegetated, abandoned, and substantially unnoticeable.

HOBBLE CANYON (Cont.)



13. KC-7-19; Mustang Knoll Quad; T38N, R13W, Section 21; view toward the southwest and shows the untrammed condition of travel way T-Y.



14. KC-7-21; Mustang Knoll Quad; T38N, R13W, Section 22; view is toward the southwest and depicts travel way Z-T as blocked by a fallen juniper. The route is little used and appears abandoned beyond the fence line a short distance beyond this photo location.



15. KC-7-24; Mustang Knoll Quad; T38N, R13W, Section 22; view is toward the south and shows travel way T-X at "X." The route appears abandoned.



16. KC-7-26; Mustang Knoll Quad; T38N, R13W, Section 23; view is toward the west of erosion on travel way S1-T. This travel way is fences without a gate and appears abandoned.



17. KC-7-27; Mustang Knoll Quad; T38N, R13W, Section 23; view is toward the west and shows travel way S1-T at "S1." The route appears abandoned.



18. KC-8-22; St. George Quad; T37N, R13W, Section 11; photo shows view to the north as travel way J1-J2 completely disappears in revegetated area.

HOBBLE CANYON (Cont.)



19. KC-8-25; St. George Quad; T37N, R13W, Section 11; photo depicts travel way J1-J2 as revegetated and substantially unnoticeable. View is toward the north.



20. KC-8-26; St. George Quad; T37N, R13W, Section 14; view toward the northwest of the junction of BLM Route 1032 with travel way J1-J2. The route is a little-used two track

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Ide Valley Wilderness (10,218 acres). Quad: Mustang Knoll).

Summary:

The Arizona Wilderness Coalition recommends the 10,218-acre proposed Ide Valley Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that the agency inconsistently and incorrectly applied wilderness suitability criteria to the unit (1-127; 7,970 acres). New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

Ide Valley consists of rugged, serpentine valleys, rolling hills and scenic vistas providing wildlife connectivity with the Paiute Wilderness to the northwest. Its expansive pinyon and juniper woodlands include sage grading into blackbrush and grasslands.

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1982, the BLM described Ide Valley as consisting of "rolling hills, twisting canyons, small escarpment, knolls, and a few largely unnoticeable vehicle ways and range improvements (USDI, BLM, 1982, EIS:53).

*The topography lends itself to excellent screening with rolling hilly terrain, small valleys, occasional rock and cliff outcropping, small escarpments, narrow twisting canyons, and a large knoll rising 700 feet above the terrain below the vegetation, consisting of various densities of pinyon-juniper, sage, grasses, cliffrose, oak, manzanita, and other shrubs, complements the screening effect of the topography. Together, the topographic relief and vegetation provide the visitor with **outstanding opportunities for solitude** (USDI, BLM, 1982, EIS:53. Emphasis added).*

The agency added "[a]lthough opportunities for hiking, backpacking, camping, horseback riding, and sightseeing exist, they are not outstanding" (USDI, BLM, 1982, EIS:53).

The BLM proposed Ide Valley as nonsuitable for wilderness designation:

The unit lacks high-quality wilderness characteristics and outstanding opportunities for primitive and unconfined recreation, and its solitude does not exceed the minimum standards (USDI, BLM, 1982, EIS:21).

While recent citizen's inventories reported outstanding opportunities for each wilderness-dependant experiential quality, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). In addition, policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the unsubstantiated "high-quality" exclusionary logic. The BLM's did not elaborate on the

unit's failure to **exceed** "the minimum standards" for solitude. The Wilderness Act and BLM policy refers to outstanding opportunities for solitude and the unit met this hurdle. Nowhere in policy or law is "exceeding" this standard required. The AWC submits that the agency's 1982 decision regarding naturalness and outstanding opportunities for solitude should have supported, not precluded wilderness designation.

C. Preliminary AWC Recommendation

New information derived from a recent citizen's inventory demonstrates that the area (former WSA 1-127; 7,970 acres and Monument lands surrounding Mustang Knoll) meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

1) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed Ide Valley Wilderness (10,218 acres) meets the BLM size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

In 1982, the BLM stated that Ide Valley WSA contained "a few largely unnoticeable vehicle ways and range improvements" (USDI, BLM, 1982, EIS:53). Recent citizen's surveys concluded that most of the travel ways remain in fact substantially unnoticeable and the area appeared natural (photos IV-1,2,3,4). The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Ide Valley Wilderness, the answer to both questions is a resounding yes (photos IV-1,2,3,4). As concluded in the BLM's 1982 assessment described above and the recent citizen's inventory, the area "generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). Its scenic escarpments and knolls, expansive woodlands, intricate drainages, and grasslands creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other desert avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Ide Valley's human imprints consist primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). As mentioned above the BLM stated that Ide Valley WSA contained "a few largely unnoticeable vehicle ways and range improvements" (USDI, BLM, 1982, EIS:53). AWC maintains that it is reasonable to assume past impacts created by the travel ways described below (A2-D-F and D-D2; see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.² Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)³, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁴, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Ide Valley Wilderness' size, terrain variation (ranging from the softly undulating juniper and pinyon forests to picturesque valleys, knolls and escarpments) contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. In 1982, the agency stated that "the topographic relief and vegetation provide the visitor with **outstanding opportunities for solitude**" (USDI, BLM, 1982, EIS:53. Emphasis added). In addition, recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including outstanding opportunities for primitive recreation as hiking, hunting, backpacking, horseback riding, and sightseeing, contrary to the agency's 1982 negative assessment regarding primitive and unconfined recreation (USDI, BLM, 1982, EIS:53. See photos IV-1,2,3,4). The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states

that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Ide Valley's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- Paleozoic strata against the highly faulted terrain
- fossils, including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River and the Grand Canyon....

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature.
- Riparian corridors...allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

1) Proposed Boundary

Beginning in the southwestern corner at the junction of State Route 101 with BLM Route 1051 (T38N, R14W, Section 24); in a northerly direction along 1051 to a point east of Ide Valley Spring; then continuing along 1051 in an easterly direction to its junction with point "A1" in Section 4 (T38N, R13W); then along boundary presented in AWC topographic map to point "A2" in Section 34 (near BM 5282); then along the Monument boundary in an easterly then southerly direction to State Route 101; then in a westerly direction along 101 to its junction with BLM Route 1051.

2) Proposed Travel Way Closures

- C (A2)-D (T 38 N, R 13 W, Sections 3, 10; T 39 N, R 13 W, Section 34) is an unnumbered route marked on BLM map (USDI 2000). The travel way consists of 2.85 miles of severe erosion (photos KC-5-1,2) and should be closed to its junction at "D" in section 10 to protect monument values (photo KC-5-8; KC-6-27).
- F-D-D2; an unnumbered travel way depicted on the quad and the BLM map (USDI, 2000). It contains numerous, significant eroding sections (photos KC-38-7,8) and provides redundant access to a trick tank better accessed by travel way F-G. F-D-D2 should be closed to protect Monument values.
- E1; a 1/4-mile access travel way to an earthen tank in Section 22. It should be closed to mechanized access. Agreements for essential maintenance can be developed under the minimum requirement process.
- A'-A2 (T 38 N, R 13 W, Sections 3-4; T 39 N, R 13 W, Section 34), a 2.0-mile travel way not located on either the quad map nor the BLM map (USDI 2000). It forms part of the unit's the northern boundary. The western 0.5 miles provides access to a structure and well site. The route continues to its junction with A2-D-F at A2. This section consists of numerous steep, severely eroding sections following a buried pipeline. Impassible to four-wheel drive, there was no indication of any type of vehicular use. This eroding, eastern 1.5-mile route should be stabilized with water drainages and closed to all mechanized vehicles.

3) Cherry Stems

F-G-E; an access road to a very large (100x200-ft) water catchment and steel tank (T 38 N, R 13 W, Section 16). The travel ways west of the tank depicted on the quad and the BLM map (USDI 2000) are not locatable on the ground and should be considered permanently closed to mechanized travel to protect monument values. "A dead-end (cherry-stem)...does not by itself disqualify and area from being considered 'roadless'"(USDI 2001 [H-6310-1, Section .13(A)(3), page 10]).

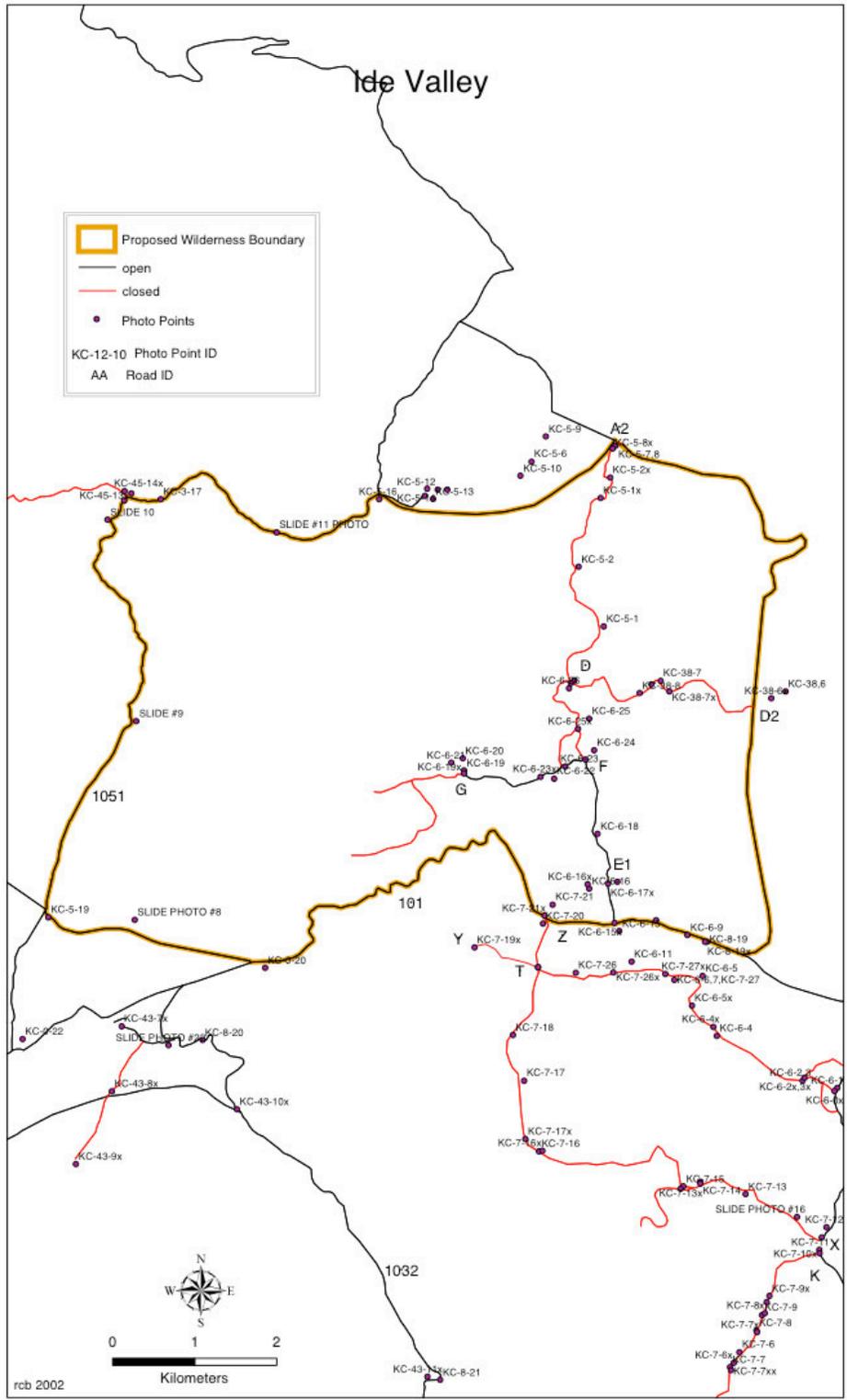
¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

² The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

³ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁴ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor

vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.



IDE VALLEY



1. KC-5-1; Mustang Knoll, T38N, R13W, Section 3; view toward the east of eroding section of travel way C-D.



2. KC-5-2; Mustang Knoll, T38N, R13W, Section 3; view toward southwest of eroding section of travel way C-D.



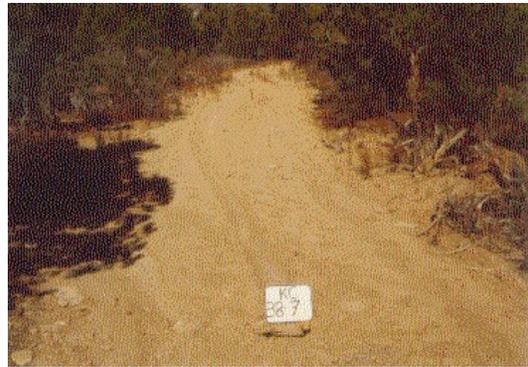
3. KC-5-8; Mustang Knoll, T38N, R13W, Section 34; view toward the east of eroded A2-D at A2.



4. KC-6-25; Mustang Knoll, T38N, R13W, Section 10; view toward the southwest of abandoned route section immediately off of travel way D-E.



5. KC-6-27; Mustang Knoll, T38N, R13W, Section 10; view toward the northwest of travel way C-D at point "D".



7. KC-38-7; Mustang Knoll, T38N, R13W, Section 11; view is toward the northwest of an eroded section of travel way D-D2.

IDE VALLEY (Cont.)



8. KC-38-8; Mustang Knoll, T38N, R13W, Section 11; view is toward the northeast of a severely eroded section of travel way D-D2.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Lime Kiln Mountain Wilderness (30,175 acres; Quads: Jacobs Well and Elbow Canyon).

Summary:

The Arizona Wilderness Coalition recommends the 30,175-acre Lime Kiln Mountain for Wilderness designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

This spectacular portion of the central Virgin Mountains consists of the dramatic escarpments of Lime Kiln and Lead Mine Mountains, and Mojave desert vegetation including critical desert tortoise habitat,. The proposed wilderness north of the Virgin Mountain axis lies outside the Grand Canyon-Parashant National Monument.

B. Historical Review and Critique of the 1982 WSA Decision Process

According to the BLM, Lime Kiln Mountain (originally called the Virgin Mountains WSA, Unit 1-129; 37,681 acres)

*[o]ffers **outstanding opportunities** for hiking, hunting, backpacking, rock climbing, sightseeing, and photography [primitive and unconfined type of recreation]¹.... Moreover, the Virgin Mountains are also of scientific and scenic value" (USDI, BLM, 1982, EIS:54; emphasis added).*

Although the BLM considered the area "primarily natural...its five miles of vehicle ways, three corrals, and two tanks are largely unnoticeable" (USDI, BLM, 1982, EIS:54), the agency proposed the entire unit as nonsuitable for wilderness designation:

[t]he unit's broad eastern and western slopes lack outstanding opportunities for solitude and reduce the overall quality of solitude. Opportunities for primitive and unconfined recreation are not of high quality, and the unit has 400 acres of nonfederal mineral estate (USDI, BLM, 1982, EIS:21).

On one hand the BLM lauds the area's outstanding opportunities for a primitive and unconfined type of recreation, and on the other contradicts itself by stating the unit lacks such qualities. The agency did not elaborate on how the unit's "broad eastern and western slopes lack outstanding opportunities for solitude and reduce the overall quality of solitude." While recent citizen's inventories reported outstanding opportunities for each wilderness-dependant experiential quality, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). In addition, policy prohibits comparisons or numerical, alphabetical, or qualitative

rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the unsubstantiated "high-quality" exclusionary logic.

The AWC submits that the agency's 1982 decision regarding naturalness and outstanding opportunities for a primitive and unconfined type of recreation should have supported, not precluded wilderness designation.

C. Preliminary AWC Recommendation

New information derived from a recent citizen's inventory demonstrates that Lime Kiln Mountain meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

1) Mandatory Wilderness Characteristics (Wilderness Character)²

a) Size

The proposed Lime Kiln Mountain Wilderness (30,175 acres) meets the BLM size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

In 1982, the BLM stated that Lime Kiln Mountain was "primarily natural...its five miles of vehicle ways, three corrals, and two tanks are largely unnoticeable" (USDI, BLM, 1982, EIS:54). Recent citizen's surveys concluded that most of the travel ways remain in fact substantially unnoticeable and the area appears natural (photos MEH-7; KC-A1-12, 14; KC-39-20).

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Lime Kiln Mountain Wilderness, the answer to both questions is a resounding yes (photos KC-A1-17, KC-B1-4). As concluded in the BLM's 1982 assessment described above and the recent citizen's inventory, the area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). It's dramatic escarpments and

canyons, expansive desert grasslands, intricate drainages, and jagged mountains creates a picturesque, rugged wilderness home to bighorn sheep, desert tortoise, mule deer, mountain lions, raptors and other desert avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness... which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Lime Kiln Mountain's human imprints consist primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). As mentioned above the BLM considered Lime Kiln Mountain (Virgin Mountain WSA) as "primarily natural... its five miles of vehicle ways, three corrals, and two tanks are largely unnoticeable" (USDI, BLM, 1982, EIS:54). The AWC maintains that it is reasonable to assume past impacts created by the travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.³ Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)⁴, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁵, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Lime Kiln Wilderness' size, terrain variation (ranging from rugged mountain escarpments to the softly undulating, picturesque Mojave desert grasslands and Joshua trees) contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos KC-A1-17, KC-B1-4.MEH 4). In 1982, the agency lauded the area's **outstanding opportunities** for hiking, hunting, backpacking, rock climbing, sightseeing, and photography [primitive and unconfined types of recreation] (USDI, BLM, 1982, EIS:54; emphasis added).

The BLM stated that the "unit's broad eastern and western slopes lack outstanding opportunities for solitude and reduce the overall quality of solitude" (USDI, BLM, 1982, EIS:54). The AWC disagrees with this assessment (photo KC-A1-17). Recent citizen's evaluations demonstrate Lime Kiln Mountain's outstanding opportunity for solitude. In addition, current policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). The staff should not assume that

"simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Policy instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Finally, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM reconsider Lime Kiln's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

In 1982, the BLM noted that "the Virgin Mountains [Lime Kiln Mountain] are also of scientific and scenic value" (USDI, BLM, 1982, EIS:54). Portions of the proposed Lime Kiln Mountain Wilderness include parts of the Virgin Slopes ACEC, significant habitat "to be managed primarily for recovery of desert tortoises (USDI 1988, Mojave Desert Amendment, page 5 and Map 3). Wilderness designation would contribute to protecting this species. The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Lime Kiln Mountain's "optional Wilderness Characteristics" and include:

1) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

2) A geological treasure, including

- colorful...Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults

3) Important watershed for the Colorado River

4) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, watchtowers, agricultural features, burial sites, caves, rockshelters, trails, and camps.

- Areas of importance to existing Indian tribes

5) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors... allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife [including big horn sheep]
- Numerous threatened or endangered species including the Mexican spotted owl, the California condor, and the desert tortoise.

1) Proposed Boundary

Beginning in the unit's northwestern corner at the junction of travel way B-C-D with State Route 299 (Elbow Canyon Quad; T39N, R15W, Section 13) and traveling in an easterly direction along 299 to its junction with Elbow Canyon Road in Section 8; then in a southerly and then easterly direction up Elbow Canyon to its junction with BLM Route 1004 (Mt. Bangs Quad; T39N, R15W, Section 24); then in a southerly direction along 1004 to its junction with BLM Route 1041 in Section 3; then in a southeasterly direction along 1041 to the bottom of Section 6 (Jacobs Well Quad; T37N, R15W); then in a westerly direction along the proposed boundary depicted in the AWC base map (roughly parallel and north of State Route 242) to its junction with 242 in Section 3 (Hen Springs Quad; T37N, R16W); then along 242 in a northerly direction to its junction with travel way B-C-D at "D" in Section 9 (Hen Springs Quad; T38N, R16W); then in a easterly direction along travel way B-C-D to point "C1"(Jacobs Well Quad; T38N, R16W, Section 1); then in a southeasterly then northerly direction along travel way C1-C2-B3 in Section 31 (T38N, R15W); then in a northerly direction to the junction of travel way B-C-D to its junction with State Route 299 (Elbow Canyon Quad; T39N, R15W, Section 13).

2) Travel Way Closures

- AA-BB; an abandoned travel way depicted on the Jacobs Well Quad but not on the BLM map (USDI 2000). Its junction with BLM Route 1041 is difficult to discern (photo KC-A1-9; T38, R15W, Section 31) and the entire route is substantially unnoticeable (photos KC-A1-10,12,14). It should be permanently closed to mechanized travel to protect monument values.
- C3-C4; an abandoned travel way depicted on the Jacobs Well Quad and the BLM map (2000 USDI) beginning at its junction with travel way B-C-D in Section 12 (photo KC-39-19; T38N, R16W). The way quickly deteriorates in a severely eroded section (photo KC-39-21) that should be stabilized with primitive water bars and drainage berms. The way appears abandoned and is substantially unnoticeable (photo KC-39-20). It should be closed to mechanized travel to protect wilderness values.
- G-G2; an abandoned travel way depicted on the Jacobs Well Quad but not on the BLM map (USDI 2000). Its junction with BLM Route 1004 is difficult to discern (see

photo MEH-13; T38N, R15W, Section 34) and indicates little, if any 4X4 use. Most of the way is revegetated and substantially unnoticeable (photos MEH 7-12).

3) Cherry Stems

Lead Mine Springs Road (C5-C6) is a 0.3-mile route leading to a filthy hunter's camp in Section 13 (photo KC-38-22; Jacobs Well Quad; T39N, R15W). AWC staff could not discern the north-south trending jeep trail depicted on the quad and BLM map (USDI 2000) as ending north of Lead Mine Mountain. It should be closed to mechanized travel to protect wilderness values.

¹ Defined in USDI 2001 [H-6310-1, Section .13(B)(3)(b)(2)] as "nonmotorized (sic), non-mechanical (except as provided for by law), and undeveloped types of recreation activities."

² "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

³ The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

⁴ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁵ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

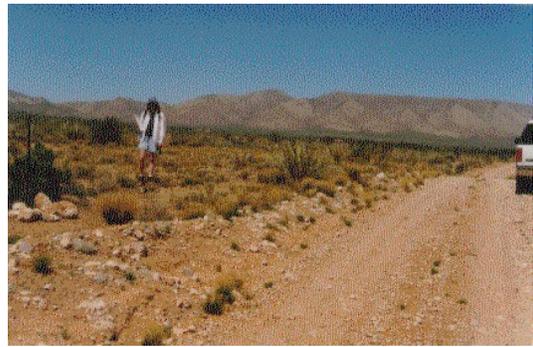
LIME KILN MOUNTAIN



1. MEH-2; Jacobs Well Quad; T38N, R15W, Section 34; view toward east of travel way G-GG. This way is generally revegetated.



2. MEH-7; Jacobs Well Quad; T38N, R15W, Section 4; travel way G-GG appears abandoned and is substantially unnoticeable.



3. (Left) MEH-13; Jacobs Well Quad; T38N, R15W, Section 34; view toward north of travel way G-GG's junction with BLM Route 1004. The route is substantially unnoticeable and appears abandoned.

4. (Above) KC-A1-9; Jacobs Well, T38N, R15W, Section 31; view toward the east of travel way AA-BB. The way appears abandoned and is substantially unnoticeable at its junction with BLM Route 1041.



5. KC-A1-10; Jacobs Well, T38N, R15W, Section 31; view toward the northeast of travel way AA-BB. The way appears abandoned and is substantially unnoticeable.



6. KC-A1-12; Jacobs Well, T38N, R15W, Section 31; view toward the northwest of travel way AA-BB. The way appears abandoned and is substantially unnoticeable.

LIME KILN MNT. (Cont.)



7. KC-A1-14; Jacobs Well, T38N, R15W, Section 24; view toward north of travel way AA-BB. The way appears abandoned and is substantially unnoticeable.



8. KC-38-22; Elbow Canyon Quad, T39N, R15W, Section 13; dumping along State Route 299 near Mesquite is a serious problem.



9. KC-39-19; Jacobs Well, T38N, R16W, Section 12; view toward the north east of the junction of travel way B-C-D and C3-C4 at point C4. The way appears little used and becomes impassable to 4X4 a few hundred feet beyond the junction.



10. KC-39-20; Jacobs Well, T38N, R16W, Section 12; view toward southwest of the abandoned travel way C3-C4. The way is substantially unnoticeable.



11. KC-39-21; Jacobs Well, T38N, R16W, Section 12; view toward southwest of erosion on travel way C3-C4.



12. KC-39-23; Jacobs Well, T38, R16W, Section 14; view toward the northwest of Lead Mountain Spring campsite, the terminus of the proposed cherry stem road.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Jump Canyon Wilderness (13,832 acres; Quads: Cane Springs, Cane Springs SE, Mustang Knoll and St. George Canyon).

Summary:

The Arizona Wilderness Coalition recommends the 13,832-acre proposed Jump Canyon Wilderness for Wilderness designation. A review of the 1979-80 wilderness inventory process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Jump Canyon wilderness consists of colorful cliffs (photo KC-43-23), expansive grasslands (photo KC-43-15,16), and intricate canyons. It is home to mule deer, bighorn sheep, mountain lions, raptors and a variety of other desert species.

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified Jump Canyon (Unit 1-123; 14,054 acres) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931]), including Jump Canyon. The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result of this process, 110 acres of the unit's 14,054 acres were recommended for non-wilderness status (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results"). In spite of the unit clearing a succession of administrative hurdles, and apparently without further public documentation of the area's wilderness character, the BLM dropped the entire Jump Canyon from further wilderness evaluation.

Since new information derived from a recent citizen's inventory demonstrates that Jump Canyon meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed 13,832-acre Jump Canyon Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's

activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Jump Canyon Wilderness, the answer to both questions is a resounding yes (photos KC-43-11,15,16,23). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos KC-43-11,15,23). It's expansive grasslands (photo KC-43-15,16), rugged cliffs (photo KC-43-23), intricate drainages, and size creates a picturesque wilderness home to mule deer, mountain lions, bighorn sheep, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Jump Canyon's human imprints consist of primarily of an abandoned or little-use travel way not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). Most of travel way AA-BC meets this criteria and is in fact "substantially unnoticeable" (photo KC-43-17,18,20).

The principal proposed "road" closures within the proposed wilderness consist of little-used section of travel way AA-BC to wildlife water catchment (St. George Canyon Quad) and FF-GG (Mustang Knoll Quad). These travel ways should be closed to vehicular access and stabilized to protect Monument values. Agreements for essential maintenance of to the corral in along travel way FF-GG and the wildlife water catchment along AA-BC can be developed under the minimum requirement process. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.² Scholars point out that the

Wilderness Act embodies two distinct standards. One definition, in section 2(c)³, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁴, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Jump Canyon Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos KC-43-11,15,16,23). While much of the area consists of gently rolling grasslands (photos KC-43-15,16), current BLM policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). The evaluator should not assume that "simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Policy instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Finally, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM to reconsider Jump Canyon's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Jump Canyon's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- colorful...Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils, including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River and the Grand Canyon....

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature. This includes a Mohave Desert plant community occupying the lower slopes and Supai bench area including Joshua trees, yuccas, and agave
- Riparian corridors...allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

3) Proposed Boundary

Beginning in the unit's southeastern corner at the junction of BLM Routes 1032 and 1033 (St. George Canyon Quad; T37N, R13W, Section 16); continuing along 1033 in a westerly direction to its junction with BLM Route 1003 (Cane Springs SE Quad; T36N, R14W, Section 2); then along 1003 in a westerly direction to its junction with BLM Route 1007 in Section 3; then in a northerly direction along 1007 to an unnamed wash labeled point "A" in Section 35 (Cane Springs Quad; T38N, R14W); then along the wash south of BM 4049t in an easterly direction and continuing in an easterly direction along the boundary depicted in the AWC Quads (Cane Springs and Mustang Knoll), excluding the road loop depicted on the BLM map (USDI 2000) in Section 30, to BLM Route 1032 at the southern boundary of Section 29 (Mustang Knoll; T38N, R13W); the along 1032 its junction with 1033 (St. George Canyon Quad; T37N, R13W, Section 16).

4) Travel Way Closures

- AA-BC; a little-used (photos KC-43,17,18,20), eroded (photo KC43-14) travel way off of BLM Route 1032 (St. George Quad, T37N, R13W, Section 17). The travel way's first mile follows a wash and is severely eroded at crossings. A wildlife water

catchment is located about 2.3 miles from 1032. Beyond this location, the travel way is generally revegetated (photos KC-43,17,18,20). This portion of the travel way, a "road to nowhere," should be closed to protect Monument values. The lower, eroding sections should be closed to mechanized travel and stabilized with waterbars and other primitive drainage features. Access for essential maintenance for the wildlife catchment can be determined through the minimum requirement process.

- FF-GG; a little-used, eroding (photo KC-43-8) travel way to a corral in Section 7 (Mustang Knoll, T37N, R13W; photo KC-43-9), should be closed to protect Monument Values. Agreements for essential maintenance of the corral can be developed under the BLM's minimum requirement procedures.

¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

² The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

³ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁴ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

JUMP CANYON



1. KC-43-8; Mustang Knoll Quad, T38N, R13W, Section 30; view to east of highly eroded section of travel way FF-GG at the proposed wilderness boundary.



2. KC-43-9; Mustang Knoll Quad, T38N, R13W, Section 7; view toward the south of the end of travel way FF-GG as it disappears at the corral.



3. KC-43-11; Mustang Knoll Quad, T37N, R13W, Section 4; view toward the northwest of eastern proposed Jump Canyon Wilderness.



4. KC-43-14; St. George Canyon Quad, T37N, R13W, Section 18; view toward the northwest of an extremely eroded section of travel way AA-BC.



5. KC-43-15; Mustang Knoll Quad, T37N, R13W, Section 7; view toward the northwest of Jump Canyon's expansive grasslands. Mud Mountain Wilderness is in the background.



6. KC-43-16; St. George Canyon Quad, T37N, R14W, Section 12; view toward the northwest of Jump Canyon's expansive grasslands. Mud Mountain Wilderness is in the background.

JUMP CANYON (Cont.)



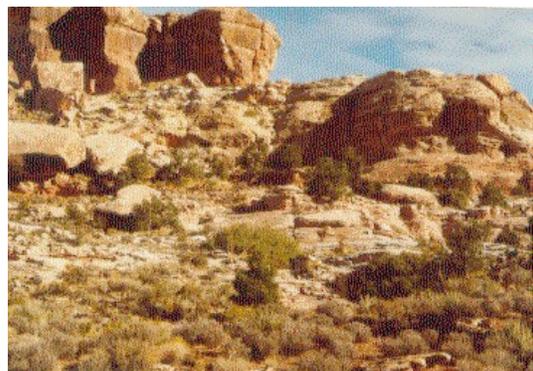
7. KC-43-17; Cane Springs SE Quad, T37N, R14W, Section 12; view is toward the south of the end of travel way AA-BC. The route, difficult to discern to here, completely fades in the vegetation.



8. KC-43-18; Cane Springs SE Quad, T37N, R14W, Section 12; view is toward the northeast of travel way AA-BC. The travel way is little-used and "substantially unnoticeable."



9. KC-43-20; Mustang Knoll Quad, T37N, R13W, Section 7; view is toward the northwest of travel way AA-BC. The travel way is little-used and substantially unnoticeable.



10. KC-43-23; Cane Springs SE Quad, T37N, R14W, Section 3. Proposed Jump Canyon Wilderness.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Million Hills East Proposed Wilderness (16,768 acres; Quads: Azure Ridge and Iceberg Canyon).

Summary:

The Arizona Wilderness Coalition recommends the 16,768-acre Proposed Million Hills East Wilderness (NPS and BLM) for WSA designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the BLM portion of the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The 14,433-acre proposed "Million Hills East" wilderness consist of the former Grand Gulch WSA (Unit 1-107; 8,141 acres) and the Arizona portion of the "Indian Hills proposed wilderness" (6,292 acres).¹ This austere, rugged region is contiguous with the Nevada proposed Million Hills Wilderness² forming a proposed wilderness of approximately 47,200 acres. The Arizona portion's greatest topographical relief occurs along its northwestern and western sections. This desert land consists of low ridges, rugged hills, and deep gullies of Mojave wildlife and vegetation. An ancient lava bed also lies along the northwest boundary. This unit is part of the Pakoon ACEC, an area managed primarily for recovery of desert tortoise (USDI, BLM, 1998, page 5 and Map 4).

B. Historical Review and Critique of the 1982 WSA Decision Process

The BLM described Million Hills (Grand Gulch WSA) as "[e]xisting in a natural condition" (USDI, BLM, 1982, EIS:51). In addition, the agency stated

This WSA's size and topography provide opportunities for solitude. The rugged landforms in the western part of the unit provide screening and cover. Below the escarpment, ridges and ravines offer seclusion. Although vegetation is generally low and scattered and does not provide ample screening for solitude, the somewhat rough topography enables a visitor to find a secluded place. Moreover, the lack of intrusions and the absence of man's imprints add to feelings of solitude and remoteness... Opportunities exist for such unconfined types or recreation as hiking, photography, and plant and geologic sightseeing. (USDI, BLM, 1982, EIS:51).

After this tepid description of Million Hills East wilderness qualities, the following conclusion seemed inevitable: "[t]hese opportunities, however, are not outstanding" (USDI, BLM, 1982, EIS:51). The BLM recommended entire unit as nonsuitable for wilderness designation (USDI, BLM, 1982, EIS:20):

The unit's overall wilderness characteristics are not of a high quality, and the unit meets but does not exceed the minimum standard for solitude. Moreover, the unit

lacks outstanding opportunities for primitive and unconfined recreation (USDI, BLM, 1982, EIS:20).

Recent citizen's inventories demonstrate that the wilderness character of entire proposed Million Hills Wilderness (49,559 acres) meet the requirements of the Wilderness Act. The area encompasses both NPS and Nevada BLM proposed wilderness units. A cursory historical review of the BLM wilderness process reveals a flawed process that led to the nonsuitable decision. In 1982, the Interior Board of Land Appeals (IBLA) ruled that "it was improper to assess an area's wilderness characteristics in association with contiguous lands administered by agencies other than the BLM" (Federal Register 1982). In a BLM "Fact Sheet" (1983), the BLM stated the agency "could not designate any area a WSA contiguous to another Federal agency's wilderness or wilderness candidate area unless the BLM unit, on its own merit, met all required wilderness criteria." Finally, in a 1983 memo, the agency stated that applying the criteria of Interior Board of Land Appeals that Grand Gulch (Million Hills East) lacked sufficient wilderness characteristics by itself (USDI, 1983, Memo, page 3). Interestingly, it also stated that an adjacent Nevada BLM WSA (NV-050-0233) "also lacks wilderness character on its own" implying that the BLM may have considered its Nevada and Arizona offices as "separate Federal agencies." The Nevada BLM apparently disagreed, for that state's unit is protected as a WSA.

Today, BLM policy states that "[e]ach inventory area must be assessed on its own merits **or in combination with an adjacent wilderness area or WSA** as to whether an outstanding opportunity exists [H-6310-1, Section .13(B)(3)(b), page 13]. The AWC firmly believes Million Hills possesses the requisite mandatory wilderness characteristics and that the BLM should re-evaluate the Arizona portion area under the current criteria.

C. AWC Recommendation

The proposed Million Hills Wilderness size, natural character, and outstanding opportunities for solitude and a primitive and unconfined type of recreation support wilderness designation. In fact, all but the Arizona BLM portion and a 2,184-acre Nevada BLM portion of the 49,500-acre unit, or 78 percent, is already administratively proposed wilderness.

1) Mandatory Wilderness Characteristics (Wilderness Character)³

a) Size

The proposed Million Hills Wilderness (47,000 acres) meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres. The NPS and Nevada BLM components are already "proposed wilderness" (USDI, NPS, 2001).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's

activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs the agency to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Million Hills Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Million Hills Wilderness size, terrain variation ranging from the softly undulating badlands to rugged canyons and mountains contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation.

In the past, the BLM disqualified Million Hills (Grand Gulch) WSA as nonsuitable for wilderness designation because it lacked "high quality" wilderness characteristics and that the "unit meets but does not exceed the minimum standard for solitude" (USDI, BLM, 1982, EIS:20). While recent citizen's inventories reported outstanding opportunities for each wilderness-dependant experiential quality, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). In addition, policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the agency's earlier, unsubstantiated "high-quality" exclusionary logic. The BLM did not elaborate on the unit's failure to **exceed** "the minimum standards" for solitude. The Wilderness Act and BLM policy refers to outstanding opportunities for solitude and the unit met this hurdle. Nowhere in policy or law is "exceeding" this standard required.

The agency's 1982 decision regarding naturalness and outstanding opportunities for solitude should have supported, not precluded wilderness designation. In addition, the failure to consider the BLM Arizona WSA as an integral part of a much larger wilderness resulted in a seriously flawed suitability analysis. We urge the BLM to reconsider its earlier analysis and provide Million Hills East interim protection as a WSA.

2) *Optional Wilderness Characteristics*

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Million Hills "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- lava-capped Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including... numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument."

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces ...a distinctive and remarkable feature
- Riparian corridors...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife
- Numerous threatened or endangered species including the desert tortoise (the entire unit lies within the Pakoon ACEC, an area managed primarily for desert tortoise recovery (USDI, BLM, 1998, page 5 and Map 4).

3. *Proposed Boundary*

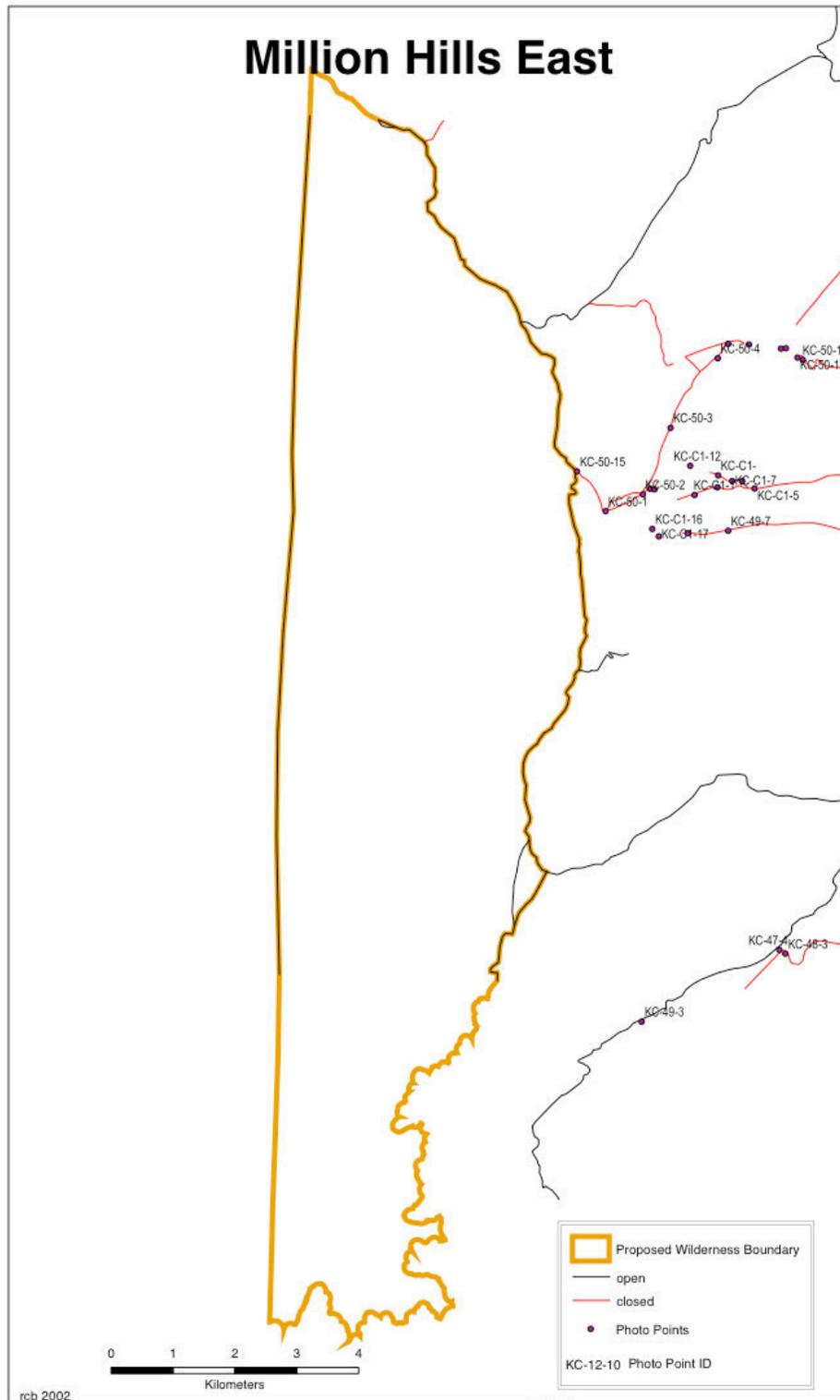
Beginning in the unit's northwest corner at the intersection of the Nevada-Arizona state line with State Route 113 (T34N, R17W, Section 6 [1/4 section west of Section 6]);

then in a southerly direction along 113 to its intersection with the Lake Mead National Recreation Area (NRA) boundary in Section 34; then due west along the NRA boundary to the Arizona-Nevada state line

¹ Indian Hills is an NPS "proposed" wilderness consisting of Lake Mead National Recreation Area's Nevada and Arizona Unit 30; 15,603 acres; 15,143 acres plus 460 listed as potential. The Arizona portion of this unit (6,292 acres) lies within the Grand Canyon-Parashant National Monument.

² Friends of Nevada Wilderness proposed 32,791-acre Million Hills Wilderness includes the Nevada BLM Million Hills WSA (21,292 acres) with an additional 2,184 BLM acres, plus the Nevada portion of the NRA's Indian Hills proposed wilderness (9,311 acres).

³ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.



Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Mt. Trumbull Wilderness Addition (Quads: Mt. Trumbull NE, Mt. Trumbull SE; Mt. Trumbull NW).

Summary The Arizona Wilderness Coalition recommends the Proposed 8,448-acre Mt. Trumbull Wilderness Addition for Wilderness designation. A review of the 1979-82 wilderness inventory process demonstrates that the agency's wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory supports the conclusion that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Mt. Trumbull Wilderness Addition is a scenic arena of cinder cones, lava flows, and Great Basin desert scrub and grasses, and other volcanic features of the Uinkaret Mountains. The area is contiguous to the 7,880 -acre Mt. Trumbull Wilderness.

B. Historical Review and Critique of the 1982 WSA Decision Process

In its 1980 report (Proposal Report), the agency noted that the "eastern portion contains several small areas of chainings that are not in a natural condition...and [a] narrow finger of the unit east [sic] has been deleted, in accordance with BLM policy." No further documentation regarding unsuitable conditions existed nor what policy applied. In its 1979 wilderness review, the BLM dropped the northern proposed addition (Unit 1-54, "Little Toroweap" intensive inventory area) from wilderness consideration based upon a single comment (USDI 1979a).¹

C. AWC Recommendation

The Mt. Trumbull Addition's wilderness characteristics of "outstanding opportunities" for both solitude and a primitive and unconfined recreation, natural condition with imprints of man "largely [substantially] unnoticeable", and size meet the mandatory requirements of the Wilderness Act. The current naturalness, size, and outstanding opportunities for solitude and a primitive and unconfined type of recreation support wilderness designation.

1) Proposed Boundary Beginning in the unit's northwest corner at the junction of the southeast corner of the private land section and the Mt. Trumbull Wilderness boundary in Section 14 (MT. Trumbull NE Quad; T35N, R8W); then due north along the eastern boundary of the private section to its junction with the unnamed travel way beginning in Section 14 and continuing in a northeasterly direction to its junction with travel way C-D at point "C" in Section 7; then in a northeasterly direction along travel way C-D to its intersection with Section 4 (point "D"); then due east along the southern boundary of Section 4 to its intersection with State Route 5 immediately south of "Little Toroweap" Reservoir; then in a southerly then westerly direction along State Route 5 (excluding the cinder pit in Section 32) to the Mt. Trumbull Wilderness boundary in the northwest

corner of Section 2 (T34N, R8W); then along the wilderness boundary in an easterly, then northerly, then westerly direction to the unit's northwest corner in Section 14.

2) Mandatory Wilderness Characteristics (Wilderness Character)²

a) Size

The proposed 8,448 Mt. Trumbull Wilderness Addition, part of the 7,880-acre Mt. Trumbull Wilderness, meets the BLM's wilderness size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Mt. Trumbull Wilderness Addition, the answer to both questions is yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Most imprints, as noted by the BLM and verified through recent citizen's inventories, are substantially unnoticeable. AWC maintains that it is reasonable to assume past impacts, such as the reported old chained areas, "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]). The same logic applies to the proposed road closures.

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Mt. Trumbull Wilderness Addition's size (8,448 acres contiguous to the 7,880-acre Mt. Trumbull Wilderness), terrain variation ranging from the undulating juniper and pinyon forests to expansive grasslands contribute to outstanding opportunities

for both solitude and a primitive and unconfined type of recreation. Although the BLM's 1979 intensive wilderness analysis ignored the area's wilderness character, the recent citizen's inventory demonstrates the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

3) *Optional Wilderness Characteristics*

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Mt. Trumbull Wilderness Addition's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- colorful, lava-capped Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River and the Grand Canyon....

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including large concentrations of ancestral Puebloan villages, numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps; and areas of importance to existing Indian tribes including Witch's Pool.

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors linking the plateau to the Colorado River corridor below, allowing wildlife movement and plant dispersal

- Diverse wildlife

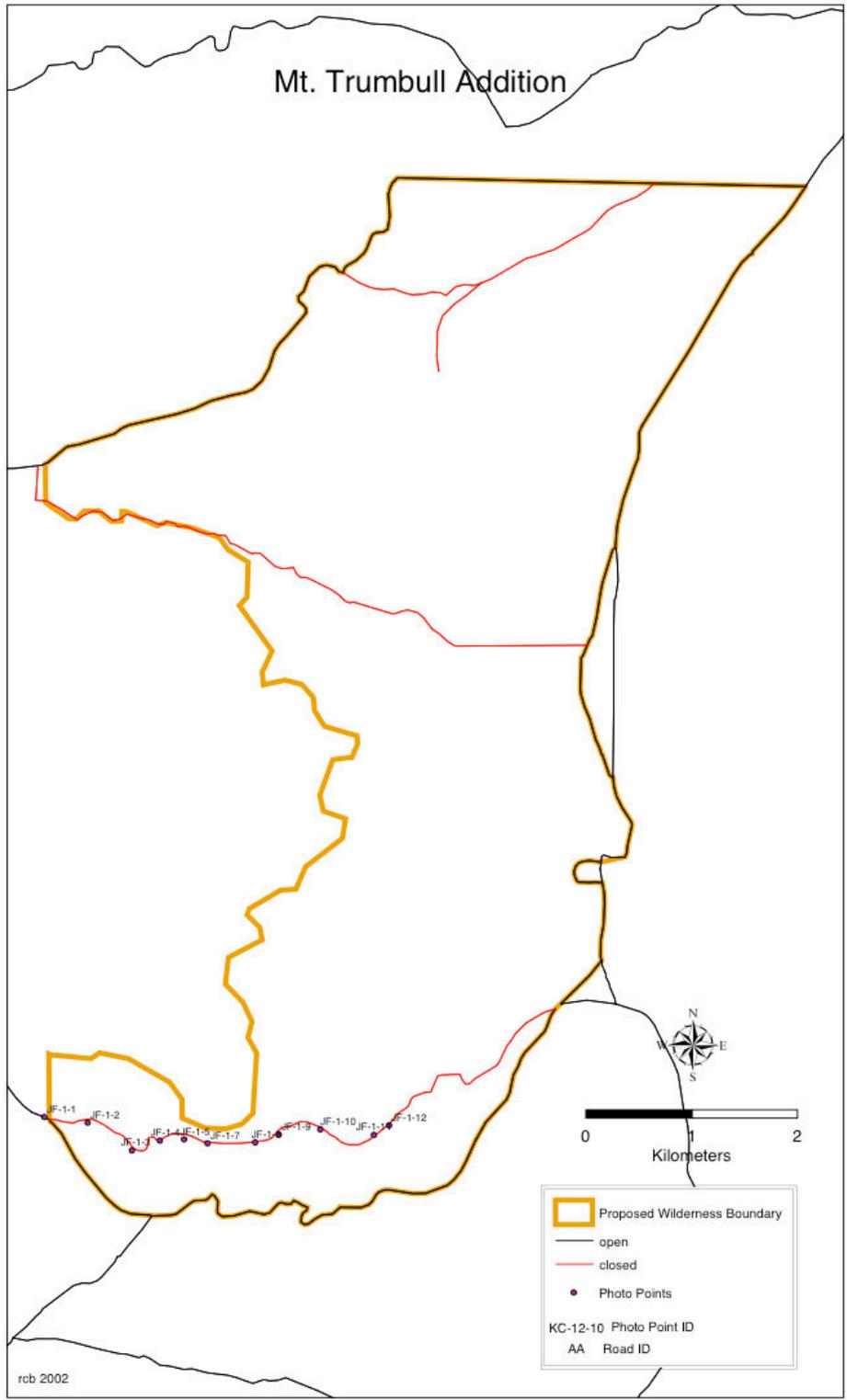
3) Proposed Road Closures

A-B; beginning in at point "A" along State Route 5 (Mt. Trumbull NE Quad; T35N, R7W, Section 20) and continuing in a southerly direction to point "B" in Section 24 (T35N, R8W) begins as a well-defined travel way but fades to an eroding, steep and little-used route along a buried pipeline. The AWC suggests closing the travel way to protect monument values such as soils, wildlife and archeological sites, and converting it to a non-mechanized trail providing access to the sensitive Witch's Pool area.

E-F; beginning at point "F" in Section 32 (T35N, R7W) and continuing to upslope to point "E" in Section 2 (T34N, R8W), this little used travel way should be closed and stabilized with primitive waterbars and checks to protect monument values, including wildlife, archaeological sites, and soils.

¹ The 1979 report stated "[t]he comment received agreed with the proposal [?] to remove the area from wilderness consideration." No other documentation regarding this decision could be located in the literature.

² "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.



Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Mud Mountain Wilderness (47,350 acres; Quads: Cane Springs; Cane Springs SE; Jacobs Well; Red Pockets).

Summary:

The Arizona Wilderness Coalition recommends the 47,350-acre proposed Mud Mountain Wilderness for Wilderness designation. A review of the 1979-80 "Overthrust Belt intensive inventory" process demonstrates that agency wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Mud Mountain Wilderness' varied landscape, ranging from the picturesque Mud Mountain (elevation 5,794 feet, about 1,700 feet above surrounding drainages) to the lower Mojave grasslands, presents a rugged, austere, and alluring wildland. The northern region consists of extensive plateaus dominated by rolling plateaus of pinon and juniper woodlands (photo MM-3). The southern Mojave hills, plains and drainages offer Joshua tree forest and desert grasslands (photos MM-1,2,4,5). The area's vastness and varied topography offers outstanding opportunities for solitude and a primitive type and unconfined type of recreation. The impacts of man are generally unnoticeable, or can be restore to a natural condition.

B. Historical Review and Critique of the 1979 "Overthrust Belt Intensive Inventory" Decision Process

In July, 1979, the Bureau of Land Management's initiated, as part of wilderness inventory, the "Overthrust Belt accelerated intensive inventory" within an area of about 510,000 acres located within the Shivwits Resource Area of Arizona Strip District. The BLM described an "Overthrust Belt" in northwest Arizona as an area of potentially important new oil and gas (USDI, BLM, 1980 Proposal Report, page 3). The inventory encompassed 21 inventory units from Grand Wash Cliffs to the Nevada state line. The BLM intended the accelerated inventory to determine which lands could "be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])).

The BLM originally scheduled Mud Mountain for "intensive inventory" in 1979 (USDI 1979, Initial Inventory). The agency engaged in a hasty, apparently cursory wilderness evaluation "so that restrictions are lifted on areas not having wilderness characteristics" (USDI, BLM, 1979, BLM Wilderness Bulletin; see USDI, BLM, 1979, Memo (8500[931])). The oil and gas potential soon proved illusionary, but Mud Mountain and seven other units were apparently dropped from any further WSA consideration as a direct result of this flawed process.¹ Since the AWC staff were unable to locate any additional historical information regarding the decision to drop this area, it is assumed its supposed oil and gas potential was the primary rationale for the agency's non-wilderness recommendation.

C. AWC Recommendation

Mud Mountain meets the Wilderness Act's criteria for wilderness designation.

1) Mandatory Wilderness Characteristics (Wilderness Character)²

a) Size

The proposed 47,350-acre Mud Mountain Wilderness meets the BLM's wilderness size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Mud Mountain Wilderness, the answer to both questions is yes (see photos MM-1,2,3,4,and 5). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Mud Mountain's human imprints include a mechanically treated burn area, but most consist primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). Most imprints, including the treated burn area, are substantially unnoticeable (photo MM-5). There are, however, travel ways meeting the "road" definition that require closure to mechanized access to protect monument values and well as wilderness criteria. AWC maintains that it is reasonable to assume past impacts created by the travel ways described below "will return or can be returned to a substantially

unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

The principal proposed "road" closure, the 1.7-mile Corral Canyon road and the 5.2-mile "F-H-I", contains evidences of construction, but the degree of regular use is not apparent and the route appears to serve no essential use (see the discussions presented below). The other "road" closure consists of the 3.8-mile "G-I" and travel way "G1-J" to stock tanks (again, see discussion presented below). Both features may require access for infrequent, essential maintenance developed under the minimum requirement process. Provisions can be developed for removal of the trick tank in the event the permittee prefers a voluntary retirement of the grazing lease.

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.³ Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)⁴, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁵, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Mud Mountain's size, terrain variation ranging from the undulating juniper and pinyon forests to rugged canyons and cliffs, to expansive grasslands and Joshua tree forests contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. While the BLM dropped Mud Mountain from wilderness consideration in 1980, the recent citizen's inventory demonstrates the area's outstanding wilderness experiential potential (see photos MM-1,2,3,4, and 5). The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Mud Mountain's "optional Wilderness Characteristics" and include:

- a) A remote area** consisting of
 - open, undeveloped spaces

- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- colorful... Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults.

c) Important watersheds for the Colorado River and the Grand Canyon...

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors...allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

3) Proposed Boundary

Beginning in the northeast corner of the proposed wilderness, the boundary begins at the junction of State Route 101 with an unnamed north-south trending spur route in Section 24 (Mustang Knoll Quad; T38N, R14W) immediately south of the 101-BLM Route 1051 junction; then along this unnamed spur in a southerly direction to its junction with BLM Route 1007; then along 1007 in a southerly direction then westerly direction to its junction with travel way segment D-E-G-H at "D" (Cane Springs SE; T36N, R15W, Section 13); then along D-E-G-H in a northerly then westerly direction to its junction with BLM Route 1027 at "H" (Red Pockets Quad; T36N, R15W, Section 16); continuing along 1027 in a northerly direction to an unnamed drainage in Section 33 (Jacobs Well Quad; T38N, R15W) approximately 0.5 miles southwest of BM 4545 in the northwest corner of Section 34; then along this unnamed drainage in an easterly direction to the top of the unnamed plateau across the "T" (in the "Pack Trail" in Section 34); then in an easterly direction to the unnamed drainage beginning 0.2 miles due south of BM 4251 in

Section 27; then in a southeasterly direction along a direct line to the northern base of Knoll 4412 in Section 35; then continuing east 0.2 miles to travel way H-O-E in Section 35; then along H-O-E in an easterly direction to its junction with State Route 101 in Section 31 (T38, R14W); then in an easterly direction along 101 to its junction with an unnamed north-south trending spur route in Section 24 (Mustang Knoll Quad; T38N, R14W) immediately south of the 101-BLM Route 1051 junction.

4) Travel Way Closures

- G-I, is an unnamed travel way appearing on the 2000 BLM recreational map but not on the quad. It provides access to an enclosure in Section 25 (Cane Springs Southeast; T37N, R15W; photo KC-2-9) and the trick tank in Section 19 (T37N, R14W; photo KC-2-8), and travel way G1-J (1.6 miles) which ends at an earthen tank in Section 19 (photo KC-2-5). G-I is a little-used travel way that could easily be restored to a natural condition (see photos KC-2-3,6). G-I ends at the trick tank (photo KC-2-7). G1-J is also little-used and would quickly return to a natural condition through non-use (photos KC-2-4,6). We suggest closing both routes to mechanized travel. Agreements for essential maintenance can be developed under the minimum requirement process, with provisions for the permittee to access both tanks. In the event that the grazing permit is retired, we suggest removing the trick tank completely and restore the entire area to a natural condition.
- B-C (2.5 miles; Cane Springs SE Quad, T37N, R15W, Sections 8 and 9) consists of little used route to a hunter's camp and an abandoned (photo KC-5-22), heavily eroded (KC-5-24,25,26) switchback which continues its 700-foot climb to the plateau . This section of route from the western terminus ("B"; marked "corral"; T37N, R14W, Section 10) of unnamed road heading west of BLM Route 1007, to its terminus at "C" on the unnamed plateau (T37N, R14W, Section 8; photo KC-5-22) should be closed and restored to a natural condition.
- F-H-I (5.2 miles) is depicted on the BLM Map (USDI 2000), begins at the junction of travel ways E-F and F-G (Cane Springs Quad, T37N, R15W, Section 1) and immediately ascends through an eroding wash (photo KC-4-21). The route is generally revegetated and apparently little-used (photo KC-4-20) and provides access to two wildlife water catchments. The first is in a serious state of disrepair and remains non-functional (photo KC-4-9). It should be dismantled and removed. The second (T37N, R14W, Section 4) is readily accessible by foot, or with some trail relocation and stabilization, by horseback from Pocum Wash through an abandoned switchback (J-K). Travel way F-H-I route should be closed to mechanical access to protect monument values, especially soil, vegetation, archaeological sites and wildlife.
- J-K is an abandoned and eroding (photos KC-4-16,18,19) switchback originating in Pocum wash (Cane Springs Quad; T37N, R14W, Section 10) and is depicted on the Cane Springs quad as a four wheel drive route connecting to Pocum Wash. It completely fades on the flats west of BLM Route 1007. The travel way should remain closed to mechanized travel and stabilized in the eroding sections. One option would be to convert the route into a hiking and/or stock trail.
- H-K, a travel way depicted as a "jeep trail" on the Cane Springs and Cane Springs SE Quads, completely fades about a half mile from Cane Springs SE B-C (photo KC-4-

10; T37N, R14W, Section 7). This is a "road to nowhere" and should remain closed to protect monument values.

- F-G (3.5 miles) begins junction of travel ways E-F and F-H-I (Cane Springs Quad, T37N, R15W, Section 1). It is a little-used (photo KC-4-22) "road to nowhere" and completely fades out near a fence line in Section 23 (photo KC-4-24; Red Pockets Quad; T37N, R15W). It should be closed to all mechanized use to protect monument values.
- Corral Canyon road (Cane Springs E-F, 1.7 miles) begins as an infrequently used two-track (T38N, R15W, Section 36; photo KC-4-27) and leads up to the plateau immediately south of Mud Mountain to join travel ways F-H-I and F-G. Closure of this route to mechanized travel would ensure protection of northern Mud Mountain's monument's values including soils, vegetation, and wildlife.
- O-N (3 miles) begins on State Route 101 (Cane Springs Quad; T38N, R15W, Section 1) and is depicted on the quad and the BLM map (USDI 2000) as a "4-wheel drive" route. The travel way consists of steep, eroded switchbacks that currently cannot accommodate 4-wheel vehicles and much of the route is largely revegetated and apparently little used (photo KC-3-9; T37n, R15W, Section 2). The travel way fades at the first two fenced stock tanks (Red Pockets Quad; photo KC-3-8; T37N, R15W, Section 11). We recommend closure to mechanized access and the emplacement of primitive waterbar and drainage berms in the steep, eroding section to protect monument values. Agreements with the permittee to access both tanks for essential maintenance can be developed under the minimum requirement process.
- A-B (Cane Springs Quad, 0.6 miles) provides access to a corral and the lower part of Cane Springs (T38N, R14W, Section 34). The eroded travel way above the corral fades about 0.2 miles above the corral (photo KC-1-19). The route above the corral should be closed to protect monument values and restored to a natural condition. We could not locate the travel way B-C (approximately 2 miles), depicted on the 2000 BLM map and the Cane Springs quad (Sections 34 and 26).
- R-M is an abandoned (photo KC-3-27; T36N, R15W, Section 9) travel way depicted as a four-wheel drive route on the quad but not on the 2000 BLM map. Most (3/4) of the route has no evidence of two-track traffic and completely fades in Section 2. The route should be closed to mechanized access to protect Monument values.
- JW-JW' begins on State Route 103 immediately south of Jacobs Well (Jacobs Well Quad; T38, R15, Section 27) and is depicted as a "stock trail" on the quad. It is not indicated on the 2000 BLM map. The actual travel way consists of an eroded series of switchbacks impassible to 4-wheel drive and should be closed to mechanized travel to protect monument values. The proposed wilderness boundary begins at the top of the switchbacks and includes a large burn area with disk-reseeding treatment (photo KC-3-11). The treatment area is visible on-site, but not from across Cow Canyon to the east and can be considered substantially unnoticeable (MM-6). The route completely fades beyond the treatment area and remains substantially unnoticeable (KC-3-12).

¹ Originally, the BLM's "Overthrust" decision affected a total of 21 Units (509,873 BLM acres) with 247,178 acres dropped from WSA consideration. Ultimately, this process resulted in eight units (138,800 acres) dropped without further evaluation for wilderness character: Unit 1-106 (Unnamed unit adjacent to LAME; 1,280 acres), now part of the Snap Canyon Proposed Wilderness; Little Arizona (part of the proposed Snap Canyon Proposed Wilderness), Unit 1-108 (16,390 acres); Olaf Knolls; Unit 1-113 (25,702 acres); Pakoon Springs (proposed Whitney Ridge Wilderness Addition) Unit 1-114 (24,832 acres; 8,373

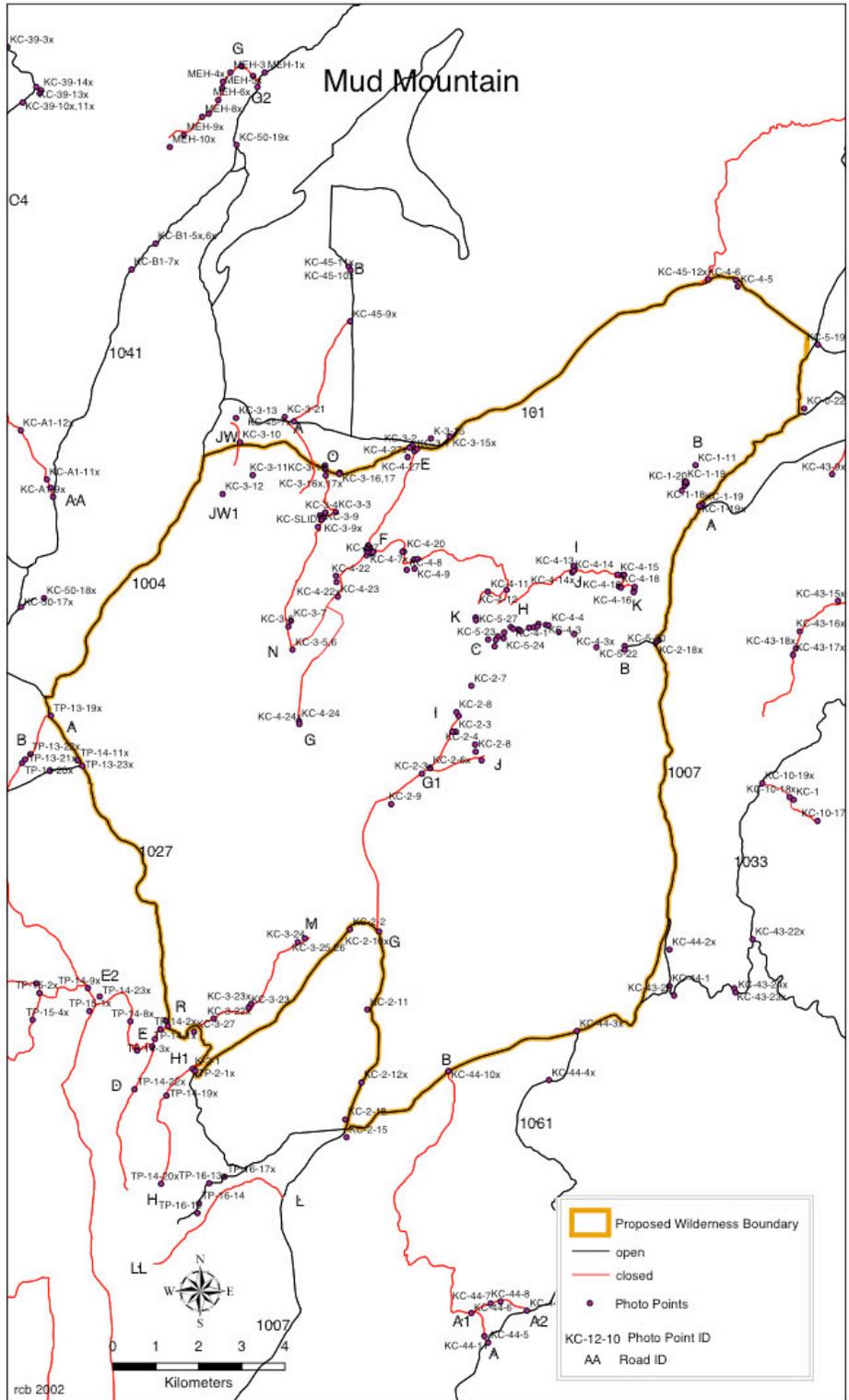
dropped); Cedar Wash, Unit 1-115 (44,848 acres); Hec's Hole; 1-121 (20,045 acres); and Jacobs (Tom and Cull Proposed Wilderness); 1-122 (5,706 acres).

² "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

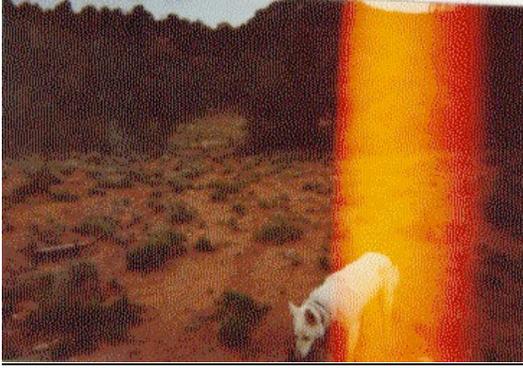
³ The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

⁴ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁵ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.



MUD MOUNTAIN PHOTO LOG



1. KC-1-19;(Cane Springs Quad; T38N, R14, Section 34) shows A-B fading into a largely revegetated condition.



2. KC-2-3; (Cane Springs SE Quad; T37N, R14W, Section 19) view toward the southeast of G-I, shows a little used travel way.



3. KC-2-4; (Cane Springs SE Quad; T37N, R14W, Section 19) view is toward the north of travel way G1-J, depicting a largely unnoticeable travel way.



4. KC-2-5; (Cane Springs SE Quad; T37N, R14W, Section 19) view is toward the north showing an earthen stock tank.



5. KC-2-6; (Cane Springs SE Quad; T37N, R14W, Section 19) view is toward the south depicting the junction of travel ways G1-J with G-I. Both routes are little used and could easily be restored to a natural condition through some hand labor and natural process.



6. KC-2-7; (Cane Springs SE Quad; T37N, R14W, Section 19) view shows the end of G-I just beyond the trick tank. The old travel way is completely revegetated and substantially unnoticeable.

MUD MOUNTAIN (Cont.)



7. KC-2-8; (Cane Springs SE Quad; T37N, R14W, Section 19). Trick tank on G-I. This is the only such structure in the proposed Mud Mountain Wilderness.



8. KC-2-9; (Cane Springs SE Quad; T37N, R14W, Section 25). The enclosure on G-I is largely unnoticeable and does not preclude wilderness.



9. KC-3-11; (Jacobs Well Quad; T38, R15W, Section 34) view is to the north of a seeded burn area on JW-JW1. This area is not substantially noticeable (see slide MM-6) from the nearest view area outside the immediate vicinity.



10. KC-3-12; (Jacobs Well Quad; T38, R15W, Section 34) stock trail JW-JW1 completely fades.



11. KC-3-8; (Red Pockets Quad; T37N, R15W, Section 11) depicts travel way O-N completely fading past the first stock tank.



12. KC-3-9; (Cane Springs Quad; T37N, R15W, Section 2) indicates a little-used travel way (O-N) that could readily become restored to a natural condition through hand labor and natural processes. View is toward the south.

MUD MOUNTAIN (Cont.)



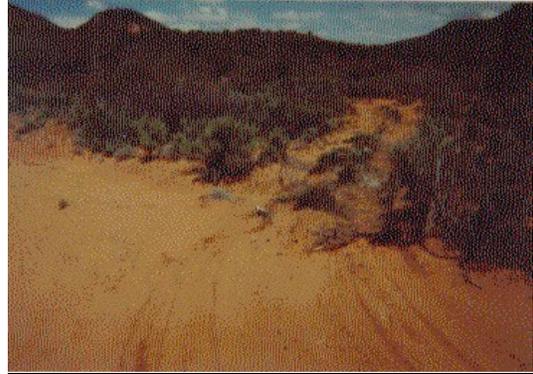
13. KC-3-26; (Cane Springs Quad; T36N, R15W, Section 2) view toward east, depicts the travel way RM completely vanishing in vegetation.



14. KC-3-27; (Cane Springs Quad; T36N, R15W, Section 9) depicts R-M, a little-used, substantially unnoticeable "road to nowhere" at its junction with BLM Route 1021.



15. KC-4-9; (Cane Springs Quad; T37N, R15W, Section 1) the wildlife water catchment is completely non-functional.



16. KC-4-27; (Cane Springs Quad; T38, R15W, Section 36) depicts E-F (Corral Canyon Road) at its the junction with State Route 101. The route is little used and could easily return to a natural condition through closure to mechanized access and with some hand labor.



17. KC-4-20; (Cane Springs Quad; T37N, R15W, Section 1) view is toward the south of travel way F-H. The route generally show little use and would quickly return to a natural condition through closure to mechanized access.



18. KC-4-21; (Cane Springs Quad; T37N, R15W, Section 1) shows an eroding section F-H as it enters a narrow wash.

MUD MOUNTAIN (Cont.)



19. KC-4-18; (Cane Springs Quad; T38, R14W, Section 9) shows a largely revegetated section of the abandoned travel way J-K.



20. KC-4-16; (Cane Springs Quad; T38, R15W, Section 10) shows the bottom of the abandoned travel way J-K.



21. KC-4-10; (Cane Springs SE Quad; T37, R14W, Section 7) view of the end of H-K is toward the south. This route, typified by the foreground, completely fades.



22. KC-4-24; (Red Pockets Quad; T37N, R15W, Section 23) depicts the largely unnoticeable travel way F-G completely fading in vegetation. View is toward the north.



23. KC-4-22; (Cane Springs Quad, T37N, R15W, Section 11) depicts the average condition of travel way F-G once past its junction with F-H. This travel way is generally unnoticeable throughout most of its length.



24. KC-5-22; (Cane Springs SE Quad; T37N, R14W, Section 8) travel way B-C completely vanishes as it reaches the plateau's summit.

MUD MOUNTAIN (Cont.)



25. KC-5-24; (Cane Springs SE Quad; T37N, R14W, Section 8) this section of travel way B-C is heavily eroded and requires some hand labor for emplacement of primitive drainage berms to help restore it to a natural condition.



26. KC-5-25; (Cane Springs SE Quad; T37N, R14W, Section 8) this section of travel way B-C is heavily eroded and requires some hand labor for emplacement of primitive drainage berms to help restore it to a natural condition.



27. KC-5-26; Cane Springs SE Quad; T37N, R14W, Section 8) this section of travel way B-C is heavily eroded and requires some hand labor for emplacement of primitive waterbars and drainage berms to help restore it to a natural condition.

Grand Canyon- Parashant National Monument Wilderness Recommendation Unit: Proposed Mustang Point Wilderness

Quads: Snap Draw, Snap Canyon East, Mustang Point, Grand Gulch Bench

The Arizona Wilderness Coalition recommends the 48,575-acre proposed Mustang Point Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Mustang Point Wilderness consist primarily of the 1982 Mustang Point WSA (1-104B; 25,952 acres) and the 1982 Salt House WSA (104A; 13,465 acres). The proposed Mustang Point Wilderness contains six spectacular, colorful miles of the Upper Grand Wash Cliffs, including the picturesque Mustang Point and scenic rolling hills of juniper, pinyon, and sage.

B. Historical Review and Critique of the 1982 WSA Decision Process

Salt House WSA

BLM recommended the entire Salt House WSA as nonsuitable for wilderness designation. The BLM maintained that Salt House WSA's "**outstanding opportunity for solitude**... is confined to areas screened by dense pinyon-juniper" (Emphasis added; USDI, BLM, 1982, EIS:19,50). "Visitors can hike and camp in the area," the agency noted, "but such experiences lack variety and challenge" (USDI, BLM, 1982, EIS:50). The BLM concluded that "The unit lacks the outstanding opportunities for primitive and unconfined recreation" (USDI, BLM, 1982, EIS:19,50). Since current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]), the AWC submits that the agency's 1982 conclusions, even if true, would not preclude wilderness designation.

The agency reported that "[t]he unit's wilderness characteristics are not of high quality" (USDI, BLM, 1982, EIS:19). Current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the earlier conclusion.

In addition, the BLM stated Salt House contained 6,500 acres of nonfederal mineral estate (USDI, BLM, 1982, EIS:19; and Map 2-9). The BLM is currently pursuing acquisition of mineral estates within this unit (USDI, BLM, 2002, Memo to Diana Hawks).

Mustang Point WSA

The BLM assessed that the Upper Grand Wash Cliffs are "highly scenic and have high geologic value...[and that] the WSA offers opportunities for sightseeing, hiking, and photography" (USDI, BLM, 1982, EIS:51). Never-the-less, the agency proposed the entire unit as nonsuitable for wilderness designation, "lacking high-quality wilderness characteristics (USDI, BLM, 1982, EIS:19). Again, current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11).

In regards to human impacts, the agency stated that, although the "unit has five miles of trails and five stockponds," those disturbances "are largely unnoticeable and do not degrade naturalness" (USDI, BLM, 1982, EIS:51). In addition, the agency reported that the unit contains 40 acres of state land and 4,920 acres of nonfederal mineral estate (USDI, BLM, 1982, EIS:19). As noted in the Salt House section above, the BLM is currently pursuing acquisition of mineral estates within the former Mustang Pt. WSA (USDI, BLM, 2002, Memo to Diana Hawks).

C. AWC Recommendation

The AWC believes that the Salt House and Mustang Pt. WSA's were inappropriately separated during the 1982 process. The BLM stated that the area "contains 13 miles of ways and four reservoirs, imprints that are largely unnoticeable" (USDI, BLM, 1982, EIS:50). Some of these travel ways constituted the boundaries between the former Salt House and Mustang Point WSA (see USDI, BLM, 1982, EIS; Map 2-9) Our recent (2001) inventory demonstrates the former common boundary consisted of unnumbered, abandoned or little-used travelways which remain "largely unnoticeable." The former Salt House and Mustang Point WSAs should be combined.

1) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed 48,575-acre Mustang Point wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.²

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?

- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Mustang Point Wilderness, the answer to both questions is yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Mustang Point's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]) and are in fact "substantially unnoticeable." The AWC maintains that it is reasonable to assume past impacts created by the travel ways described below "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

The principal proposed "road" closures consists of the northern portion of travel way "J-K" (see discussion below). The 2.3-mile section south of Pigeon Tank contains evidences of construction, but the degree of regular use is not apparent and the route appears to serve no essential use. In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.³ Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)⁴, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁵, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Mustang Wilderness size, terrain variation ranging from the softly undulating juniper and pinyon forests to rugged canyons and cliff lines contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation.

In 1982, the BLM assessed that the Upper Grand Wash Cliffs are "highly scenic and have high geologic value...[and that] the WSA offers opportunities for sightseeing, hiking, and photography" (USDI, BLM, 1982, EIS:51). Never-the-less, the agency proposed the entire unit as nonsuitable for wilderness designation, "lacking high-quality wilderness characteristics (USDI, BLM, 1982, EIS:19). Recent citizen's inventories

demonstrate the area's outstanding wilderness experiential potential. In any event, current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and, as describe above, would not support the 1982 conclusion. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) *Optional Wilderness Characteristics*

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- colorful...Precambrian and Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils including invertebrate fossils.
- portions of geologic faults, including...the Grand Wash fault.

c) Important watersheds for the Colorado River and the Grand Canyon...

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors linking the plateau to the Colorado River corridor below, allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

3. Proposed Boundary

From the junction of BLM Routes 1002 and 1012 in Section 36 (Mustang Point Quad; T34N, R14W) in the unit's northwestern corner, continuing in a southerly direction and then easterly direction to travel way "D" (Snap Draw Quad, T32N, R13W, Section 20); then in a northerly direction 1/4 mile along travel way "D" to its junction with a NW-SE trending fence line; then in a southeasterly direction along the fence line 1/2 mile to its junction with the southern boundary of Sections 20-21; then in a easterly direction along the southern border of Sections 20-21 to its junction with BLM Route 1062 in Section 22 immediately north of Upper Salt House Tank; then in a northeasterly direction along 1062 (excluding Lower Salt House Tank) to its junction with travel way "E1" (Section 13); then in a northerly direction along travel way "E1" approximately one mile to, and excluding, Snap Tank in Section 12; then in an easterly direction along "Snap Tank Road" in Snap Draw approximately 3/4 miles to its junction with "Lundell Tank Road (Castle Peak Quad);" then in a northerly direction approximately 3/4 miles to, and excluding, Lundell Tank (T33N, R12W, Section 31); then in a northeasterly direction on travel way "L-L1" continuing to its junction with the private property boundary immediately west of Mary's Tank (T33N, R12W, Section 29); then in a northerly direction along the private property boundary approximately 3 miles to a fence line at the SE corner of Section 5 (Wildcat Ranch Quad; T33N, R12W); then along fence line in a northwesterly direction to a location approximately 0.25 SE of Pigeon Tank; then in an easterly direction approximately 0.3 miles to its junction with BLM Route 1002 (Pigeon Canyon Road); then in a westerly direction to its junction with BLM Route 1012 in Section 36 (Mustang Point Quad; T34N, R14W).

4) Travel Way (TW) Closures

- "D" (Snap Draw Quad; T32N, R13W, Section 19) is a 0.2-mile section originating on BLM Route 1012 and quickly fades into an abandoned or little-used travel way (photo KC-35-5). Although depicted on the BLM map (USDI 2000) and the USGS quad as a continuous route down Snap Draw, investigations at several possible exits (point "F" of travel way E-F, Section 15, photo KC-35-7; Snap Tank, Section 1, photo KC-35-9; and point "H" of travel way G-H, T33N, R13W, Section 33) demonstrate the travel way south of the T33N-T32N boundary are abandoned or seldom used. This entire interior network should be closed to mechanized use and restored to a natural condition to protect National Monument values.
- "E-F" (Snap Draw Quad, T32N, R13W, Sections 15,22) begins on BLM Route 1062 (photo KC-35-6) and continues 0.9 miles to a earthen tank at point "F" in section 15 (photo KC-35-7). The segment should be closed to protect National Monument

values. Agreements for essential maintenance of the tank can be developed under the BLM's minimum requirement procedures.

- "G-H" (Snap Draw Quad, T33N, R13W) begins in Section 27 (photo KC-35-15) and trends westward 2.4 miles to point "H" in Section 32 (photo KC-35-19). This route is very rough, eroding and little-used (see photo KC-35-18) and should be closed to protect National Monument values including soils, native vegetation, wildlife and archaeological resources. Agreements for essential grazing feature maintenance can be developed under the BLM's minimum requirement procedures.
- "G1" (Snap Draw Quad, T33N, R13W, Section 27) begins just north of Gardner Tank (photo KC-35-24) and quickly ends in an eroded, revegetated section including established microbiotic crusts (photos KC-35 22,23). This segment provides one possible entrance to a travel way network depicted on the BLM map (2000) and the Snap Draw and Mustang Point Quads. One possible exit, point "J2" (Section 24; photo KC-36-7) is eroding and abandoned or seldom-used. The only other possible exit route is point "G2" in section 33 is completely revegetated (photo KC-35-17, 20). The entire network depicted in Sections 15,16,17 (Mustang Point Quad) and Sections 20,21,22,23,24,27,28,29 and 33 (Snap Draw Quad) should be closed to mechanized vehicles to protect Monument values including soils, microbiotic crusts, native vegetation, wildlife and archaeological resources.
- "J1-MM" (Snap Draw Quad, T33N, R13W) is a one-mile section beginning (photo KC-35-13) at the Gardner Tank Road in Section 25 and ending at point J1 in section 24. This "road to nowhere" is very eroded at point J1 (KC-36-4) and should be closed to protect Monument values including soils, native vegetation, wildlife and archaeological resources.
- "L-LL" begins at "L" (T33N, R12W, Section 31; photo KC-36-23) ends at LL (T33N, R13W, Section 25). This route provides redundant access to the Gardner Tank Road and should be closed to protect Monument values including soils, native vegetation, wildlife and archaeological resources.
- "K1-K2" is a short (0.5 mile) route depicted on the BLM map (USDI 2000) and the Mustang Point Quad (T33N, R13W, Section 13). It actually ends approximately 0.1 miles from it junction with travel way "J-K" (see photo KC-36-14) and should be closed (see discussion on travel way J-K).
- "J-K," a 6.7-mile travel way beginning in Section 26 (Snap Draw, T33N, R13W; photo KC-35-25). A short segment ("J-J1") ends at a tank approximately 0.5 miles to the northeast (photo KC-36-3). This segment is badly eroding (photo KC-36-1,2,3). Agreements for essential grazing feature maintenance can be developed under the BLM's minimum requirement procedures. The TW continues northward through Section 24 and Section 13 (Mustang Point Quad) where it is subjected to severe erosion (photos KC-36-12, 16 and 17). Section 18 (T33N, R12W; photo 36-18) contains some of the travel way's most extensive damage. AWC inventory staff could not discern the east-west trending route depicted on the Wildcat Ranch Quad (T33N,R12W, Section 17,18,19, and 20) and BLM map (2000). Travel way "L-K" continues northward through section 7 (Wildcat Ranch Quad, T33N,R12W) and ends at Pigeon Tank (Section 6) on BLM Route 1002. The travel way's significant erosional problems and the general lack of signs of regular use warrants closure to

protect Monument values including soils, native vegetation, wildlife and archaeological resources.

- The BLM excluded a large Y-shaped section from the former Mustang Point WSA based on the presence of two jeep trails (USDI, BLM, 1982, EIS: Map 2-9). Today, those "jeep trail" are depicted on both the BLM (USDI, 2000) and quads. The western travel way, beginning on BLM Route 1012 approximately 1/4 mile south of its junction with BLM Route 1002 (Mustang Pt. Quad; T34N, R13W, Section 36), extends approximately 4 miles southward into Snap Draw quad (T33N, R13W, Section 20) appears to be either abandoned or little used (see photo KC-31-7) and should remain closed. The eastern fork of this "jeep trail" beginning in Section 33 (Mustang Point; T34N, R13W), south of BLM Route 1002, and intersecting the first travel way in Section 7 could not be located.

5) Non-Wilderness Cherry Stem

Gardner Tank Road begins at Lundell Tank (Castle Peak Quad, T33N, R12W, Section 31) and continues approximately 3 miles westward to Gardner Tank (Snap Draw Quad, T33N, R13W, Section 27).

¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

² Wilderness Act, Section 2(c).

³ The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

⁴ "Definition of Wilderness ," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁵ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

Mustang Point



1. KC-31-7; Mustang Point Quad; T14W, R34N, Section 36; route off of 1012 is indistinct and substantially unnoticeable.



2. KC-35-5; Snap Draw, T32N, R13W, Section 20; view to northeast of eroding section of travel way D.



3. KC-35-6; Snap Draw, T32N, R13W, Section 22; view toward west of the beginning of travel way E-F at E (BLM Route 1062).



4. KC-35-7; Snap Draw, T32N, R13W, Section 15; view toward northwest of route E-F at F.



5. KC-35-13; Snap Draw, T33N, R13W, Section 25; view toward the northwest of junction MM. The route to Gardner Tank to left.



6. KC-35-15; Snap Draw, T33N, R13W, Section 27; view toward northwest of travel way G at Gardner Tank.

Mustang Point



7. KC-35-17; Snap Draw, T33N, R13W, Section 33; view toward northwest of junction G2.



8. KC-35-18; Snap Draw, T33N, R13W, Section 32; view toward the southwest of erosion on travel way G-H.



9. KC-35-19; Snap Draw, T33N, R13W, Section 32; view toward the southwest on the end of travel way G-H.



10. KC-35-20; Snap Draw, T33N, R13W, Section 33; view toward the northwest of the end of travel way G2.



11. KC-35-22; Snap Draw, T33N, R13W, Section 27; view of erosion on travel way G1.



12. KC-35-23; Snap Draw, T33N, R13W, Section 27; end of travel way G1 in dense microbial crust.

Mustang Point



13. KC-35-24; Snap Draw, T33N, R13W, Section 27; begin travel way G1.



14. KC-35-25; Snap Draw, T33N, R13W, Section 26; view toward the east of junction "J."



15. KC-36-1; Snap Draw, T33N, R13W, Section 26; view toward the northeast of erosion on travel way J-K.



16. KC-36-2; Snap Draw, T33N, R13W, Section 26; view toward the southwest of travel way J-K.



17. KC-36-3; Snap Draw, T33N, R13W, Section 26; view toward the northeast of travel way J-K.



18. KC-36-4; Snap Draw, T33N, R13W, Section 24; view toward the southeast of travel way J1-MM at J1.

Mustang Point



19. KC-36-7; Snap Draw, T33N, R13W, Section 24; view of erosion on travel way J2.



20. KC-36-12; Mustang Point Quad; T33N, R13W; Section 13; view toward the southeast of erosion of travel way J-K at K1.



21. KC-36-14; Mustang Point Quad; T33N, R13W; Section 13; view toward the southeast of travel way K1-K2 at K2.



22. KC-36-16; Mustang Point Quad; T33N, R13W; Section 13; view toward the southwest of severe erosion on travel way J-K.



23. KC-36-17; Mustang Point Quad; T33N, R13W; Section 13; view toward the southeast of erosion on travel way J-K.



24. KC-36-18; Mustang Point Quad; T33N, R13W; Section 27; view of severe erosion on travel way J-K. The route is effectively blocked for 4X4 passage.

Mustang Point



25. KC-36-23; Castle Peak Quad; T33N, R12W, Section 32; view of junction L.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Olaf Knolls Wilderness (16,248 acres; Quads: Olaf Knolls, Pagoon Springs, Cane Springs SE, and Red Pockets).

Summary:

The Arizona Wilderness Coalition recommends the 16,248-acre proposed Olaf Knolls Wilderness for Wilderness designation. A review of the 1979 "Overthrust Belt accelerated intensive inventory" process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

Olaf Knolls consists of gently undulating plains cut by washes. Vegetation consists of Joshua trees, creosote and grasses. The entire unit consists of significant¹ desert tortoise habitat (USDI, BLM, 1998, Map 4).

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified Olaf Knolls (Unit 1-113; 25,702 acres) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931])). The Overthrust Belt, a geologic formation, was thought to contain significant oil and gas reserves (USDI, BLM, 1980 Proposal Report, page 3). The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result, and apparently without further public documentation of the unit's wilderness character, the BLM dropped the entire Olaf Knolls from further wilderness evaluation (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results").

The predictions of the Overthrust Belt's energy potential dissolved without any economically recoverable oil or gas deposits developed on the Arizona Strip. Since new information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)²

a) Size

The proposed 16,248-acre Olaf Knolls Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity

as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Olaf Knolls Wilderness, the answer to both questions is a resounding yes (photo). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos HH-1,3). It's expansive grasslands, intricate drainages, and size creates a picturesque, rugged wilderness home to desert tortoise, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Olaf Knoll's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). This consist of abandoned travel way F-G and is in fact "substantially unnoticeable" (photo KC-44-13) .

The principal proposed "road" closures within the proposed wilderness consist of redundant and little-used routes (A-B, A1-A2, C-D). These travel ways should be closed to vehicular access and stabilized to protect Monument values. Agreements for essential maintenance of to the corral in along travel way A-B can be developed under the minimum requirement process. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.³ Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)⁴, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁵, provides strict standards for managing wilderness once designated (Turner

2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Olaf Knolls Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos KC-44-4). While much of the area consists of gently rolling grasslands, current BLM policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). The evaluator should not assume that "simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Policy instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Finally, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM to reconsider Olaf Knolls' outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Olaf Knolls' "optional Wilderness Characteristics" and include:

- a) A remote area** consisting of
 - open, undeveloped spaces
 - engaging scenery
 - natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

- b) A geological treasure**, including
 - fossils, including invertebrate fossils.
 - portions of geologic faults

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including...numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces ...a distinctive and remarkable feature
- Riparian corridors...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife
- Numerous threatened or endangered species including the desert tortoise (the proposed wilderness lies within desert tortoise habitat; see USDI, BLM, 1998, Map 4).

3) Proposed Boundary

Beginning in the unit's northeast corner at the junction of BLM Route 1007 with BLM Route 1061 (T36N, R14W, Section 9); along 1061 in a southerly direction to its junction with road segment AA-D-E at point "E" (Olaf Knolls, T35N, R14W, Section 30); then in a westerly direction along AA-D-E to its junction with 1007 (Pakoon Springs, T35N, R15W, Section 16); then in a northerly then easterly direction along 1007 to its junction with BLM Route 1061 (T36N, R14W, Section 9).

4) Travel Way Closures

- A-B; an eroding (photo KC-44-11), redundant route connecting BLM Routes 1061 (photo KC-44-5) to 1007 (photo KC-44-10). AWC proposes closing this travel way to protect monument values, especially desert tortoise. The eroded section should be stabilized with rock or log checks and the travel way closed to mechanized travel to protect monument values. Agreements for essential maintenance from BLM Route 1007 to "Upper Well" in Section 25 (Olaf Knolls Quad, T36N, R15W) can be developed under the minimum requirement process.
- A1-A2; a little used (photos KC-44-6,8), redundant route connection travel way A-B with a tank located along BLM Route 1061 (T36N, R14W, Section 32). It should be closed to mechanized use and restored to a natural condition to protect Monument values.
- C-D; a redundant, little used travel way (photos KC-44-12,14) depicted on the BLM map (USDI 2000) and the Olaf Knolls and Pakoon Springs Quads as beginning on BLM Route 1061 in Section 18 (Olaf Knolls Quad, T35N, R14W; photo KC-44-12). It should be closed to protect Monument values.
- F-G; an abandoned (photo KC-44-13) travel way depicted on the BLM map (USDI 2000) and the Olaf Knolls and Pakoon Springs Quads. The route is revegetated and substantially unnoticeable. It should be removed from all maps.

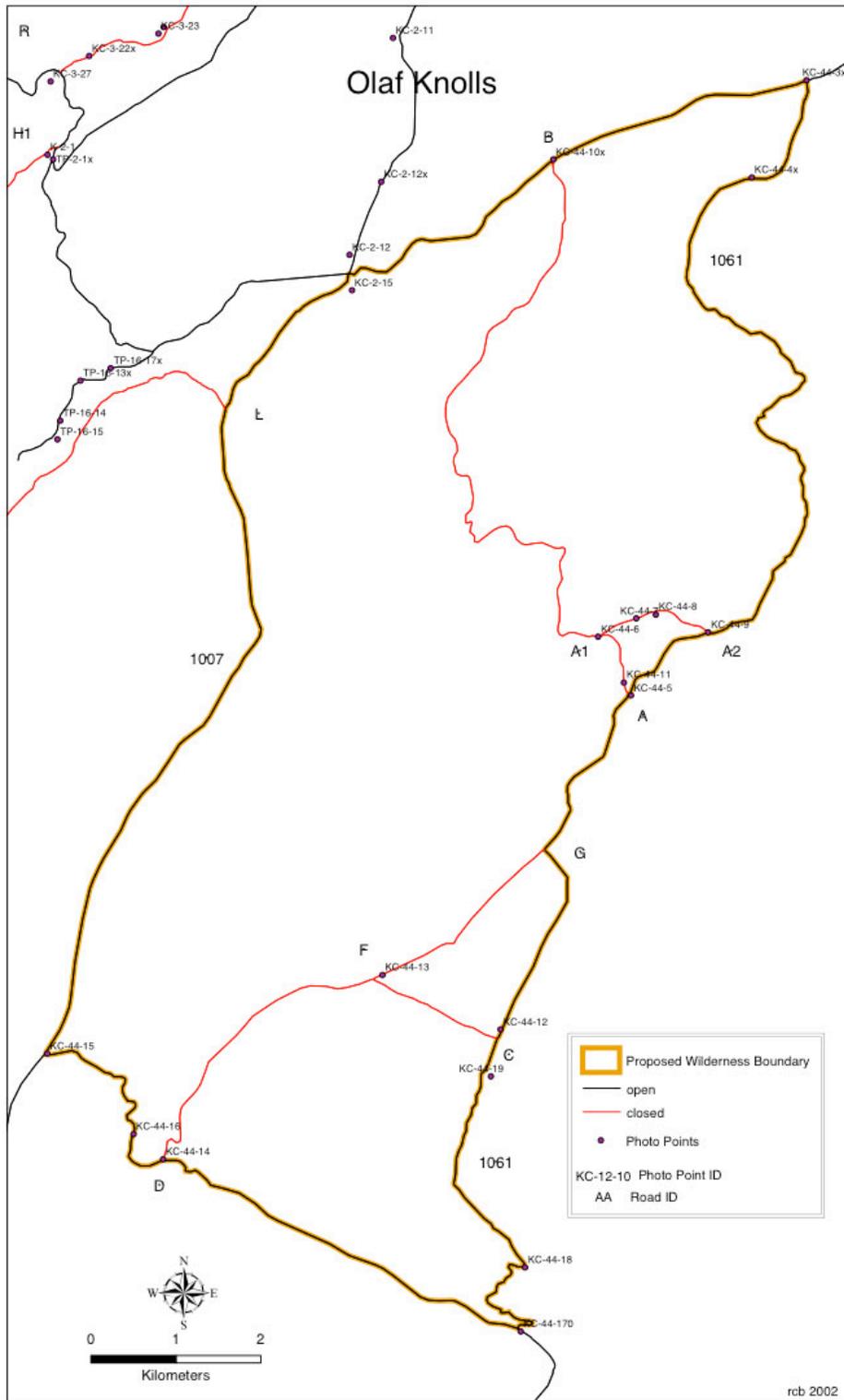
¹ The BLM classifies the land as Category III habitat (USDI, BLM, 1998, Map 4. The agency considers Category III possesses "lower value in sustaining viable populations of tortoises" (USDI, BLM, 1988, page iii). Restoration of degraded habitat can be accomplished through non-mechanical techniques of re-seeding native grasses (personal communication, Tim Duck, wildlife specialist for the Arizona Strip BLM.

² "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

³ The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

⁴ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁵ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.



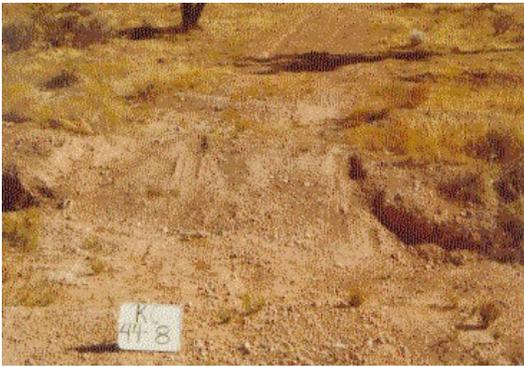
OLAF KNOLLS



2. KC-44-5; Olaf Knolls Quad, T36N, R14W, Section 32; view toward the northwest of travel way A-B at A (BLM Route 1061).



3. KC-44-6; Olaf Knolls Quad, T36N, R14W, Section 31; view toward the north of travel way A1-A2 at A1.



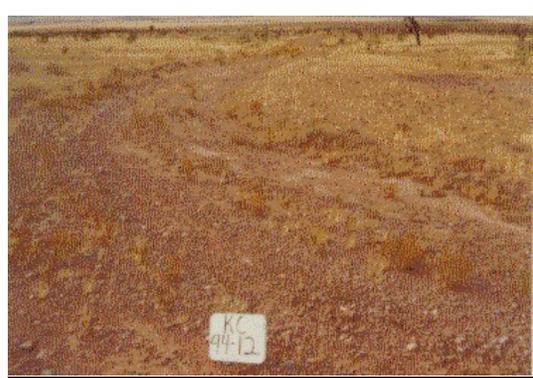
4. KC-44-8; Olaf Knolls Quad, T36N, R14W, Section 32; view toward the southeast of an eroding section of travel way A1-A2.



5. KC-44-10; Cane Springs SE Quad, T36N, R14W, Section 18; view toward the southwest of travel way A-B at A (BLM Route 1007).

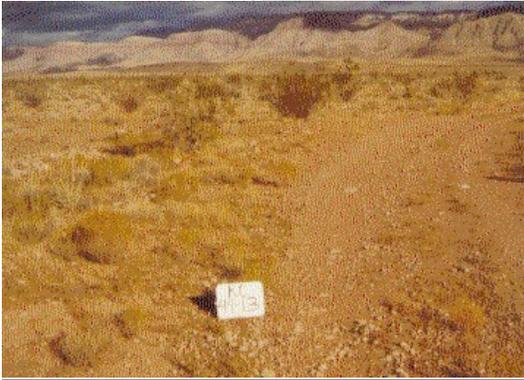


6. KC-44-11; Olaf Knolls Quad, T36N, R14W, Section 31; view toward the north of an eroding section of travel way A-B.

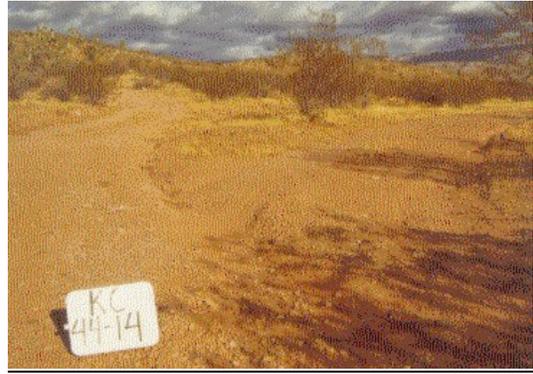


7. KC-44-12; Olaf Knolls Quad, T35N, R14W, Section 18; view is toward the west of junction of BLM Route 1061 with travel way C-D.

OLAF KNOLLS (Cont.)



8. KC-44-13; Olaf Knolls Quad, T35N, R15W, Section 13; view toward northeast from travel way C-D of travel way F-G. F-G is very faint and substantially unnoticeable at this location.



9. KC-44-14; Olaf Knolls Quad, T35N, R14W, Section 18; view toward the east of travel way C-D (on left) at point D (boundary road AA-E). The route is little-used.

**Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Paiute Wilderness Addition (4,916 acres)**

Summary The Arizona Wilderness Coalition recommends the Proposed 4,916-acre Paiute Wilderness Addition for Wilderness designation.

A. Description

The Proposed Paiute Wilderness Addition is a scenic arena of Great Basin desert scrub and grasses. The area is contiguous to the 84,700-acre Paiute Wilderness.

B. AWC Recommendation The unit's wilderness characteristics of "outstanding opportunities" for both solitude and a primitive and unconfined recreation, natural condition with imprints of man "largely [substantially] unnoticeable", and size meet the mandatory requirements of the Wilderness Act. The current naturalness, size, and outstanding opportunities for solitude and a primitive and unconfined type of recreation support wilderness designation.

1) Proposed Boundary Beginning in the unit's western section at the intersection of the Paiute Wilderness boundary and BLM Route 1004 (Jacobs Well, T38N, R15W, Section 21); then continuing in a southerly direction to the junction of 1004 and State Route 101 (excluding Jacobs Well in Section 27); then continuing in an easterly direction along 101 to its intersection with the Paiute Wilderness boundary in Section 26 (Cane Spring Quad, T38N, R15W); then along the Paiute Wilderness Boundary in a northerly than westerly direction to its intersection with BLM Route 1004.

2) Mandatory Wilderness Characteristics (Wilderness Character)ⁱ

a) Size

The proposed 4,916 Paiute Wilderness addition to the 84,700-acre wilderness meets the BLM's wilderness size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?

- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Paiute Wilderness Addition, the answer to both questions is yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Most imprints, verified through recent citizen's inventories, are substantially unnoticeable. AWC maintains that it is reasonable to assume past impacts "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Paiute Wilderness Addition's size (contiguous to the 87,000-acre Paiute Wilderness), terrain variation ranging from the undulating juniper and pinyon forests to expansive grasslands contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. The recent citizen's inventory demonstrates the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

3) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Parashant's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- colorful, Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, agricultural features, burial sites, trails, camps and areas of importance to existing Indian tribes.

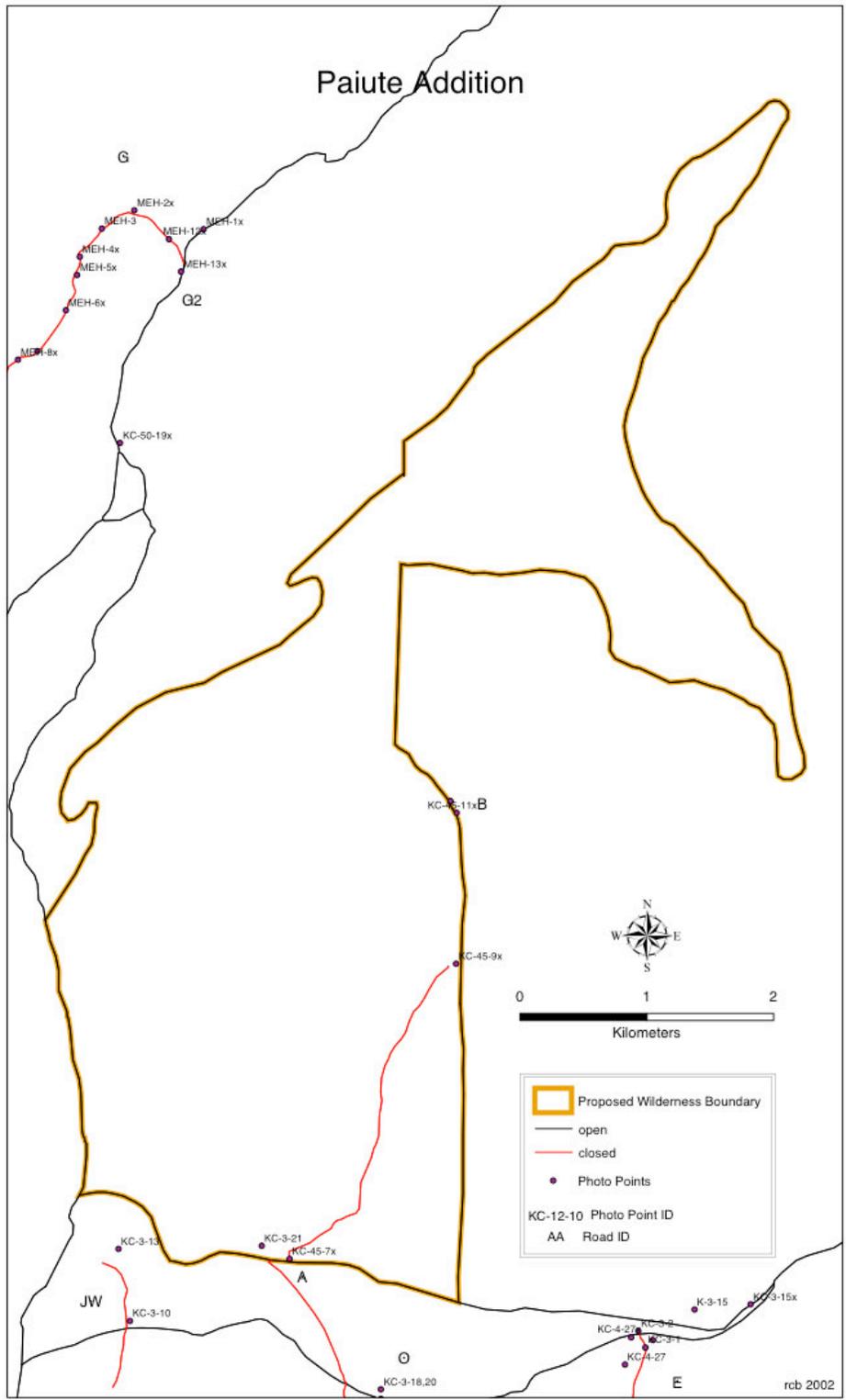
e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors allowing wildlife movement and plant dispersal
- Diverse wildlife

4) Proposed Road Closure

Travel Way A-B is an eroding, little-used route that should be closed to protect monument values such as soils, wildlife, and archaeological features.

ⁱ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.



Wilderness Inventory
Paiute Purgatory Addition (12,224 acres)
Quad: Purgatory Canyon

Summary:

The Arizona Wilderness Coalition recommends the 12,224-acre proposed Purgatory Wilderness for Wilderness designation. Recent citizen's wilderness suitability inventories support designation. A review of the 1979 "Overthrust Belt accelerated intensive inventory" process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Purgatory Wilderness addition to the Paiute Wilderness consists of an expansive, rolling grasslands and austere, rugged canyons and springs.

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified the Purgatory (Lime Hills) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931])). The Overthrust Belt, a geologic formation, was thought to contain significant oil and gas reserves (USDI, BLM, 1980 Proposal Report, page 3). The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result, and apparently without further public documentation of the unit's wilderness character, the BLM dropped the eastern section from further wilderness evaluation (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results").

The predictions of the Overthrust Belt's energy potential dissolved without any economically recoverable oil or gas deposits developed on the Arizona Strip. While extensive gypsum mining occurs to the east, and mining claims blanket the area, none occur within the proposed Purgatory boundary (BLM records). Since new information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. AWC Recommendation Purgatory's wilderness characteristics of "outstanding opportunities" for both solitude and a primitive and unconfined recreation, natural condition with imprints of man "largely [substantially] unnoticeable", and size meet the mandatory requirements of the Wilderness Act. The current naturalness, size, and outstanding opportunities for solitude and a primitive and unconfined type of recreation support wilderness designation.

1) *Proposed Boundary* Beginning at the northeast corner of the Paiute Wilderness (Purgatory Canyon Quad; T41N, R13W, Section 9) and following in an easterly direction approximately 1/8 miles south of Interstate 15 to a point east of Black Rock Gulch Canyon (4/10 mile northwest of "Jet" BM 3252) in Section 11; then in a southerly direction along the east rim of Black Rock Gulch to its intersection with BLM Route 1022; then in an westerly direction along 1022 to a point immediately north of the water tank depicted in Section 12 (T40N, R13W); then due west to the Paiute Wilderness Boundary.

2) *Mandatory Wilderness Characteristics (Wilderness Character)*

a) *Size* The proposed 12,224-acre Purgatory Wilderness meets the BLM's wilderness size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) *Naturalness* The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Purgatory Wilderness Addition, the answer to both questions is yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). Although the area has one wildlife catchment and stock tanks, these impacts are substantially unnoticeable.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Most imprints, as noted by the BLM and verified through recent citizen's inventories, are substantially unnoticeable. AWC maintains that it is reasonable to assume past impacts "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed wilderness's size (contiguous to the 87,900 Paiute Wilderness), terrain variation ranging from the undulating juniper and pinyon forests, rugged canyons to expansive grasslands contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. Although the BLM's 1982 wilderness analysis ignored the area's wilderness character, the recent citizen's inventory demonstrates the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

3) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

While not within the National Monument (portions of the Paiute Wilderness section lie within, however), the objects identified in the Grand Canyon-Parashant Proclamation suggests a relevant list of Purgatory's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- colorful Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River (Virgin River).

d) Features indicating a long and rich human history spanning more than 11,000 years including

- archeological sites preserved in good condition due to their remoteness and the lack of easy road access".
- areas of importance to existing Indian tribes.

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

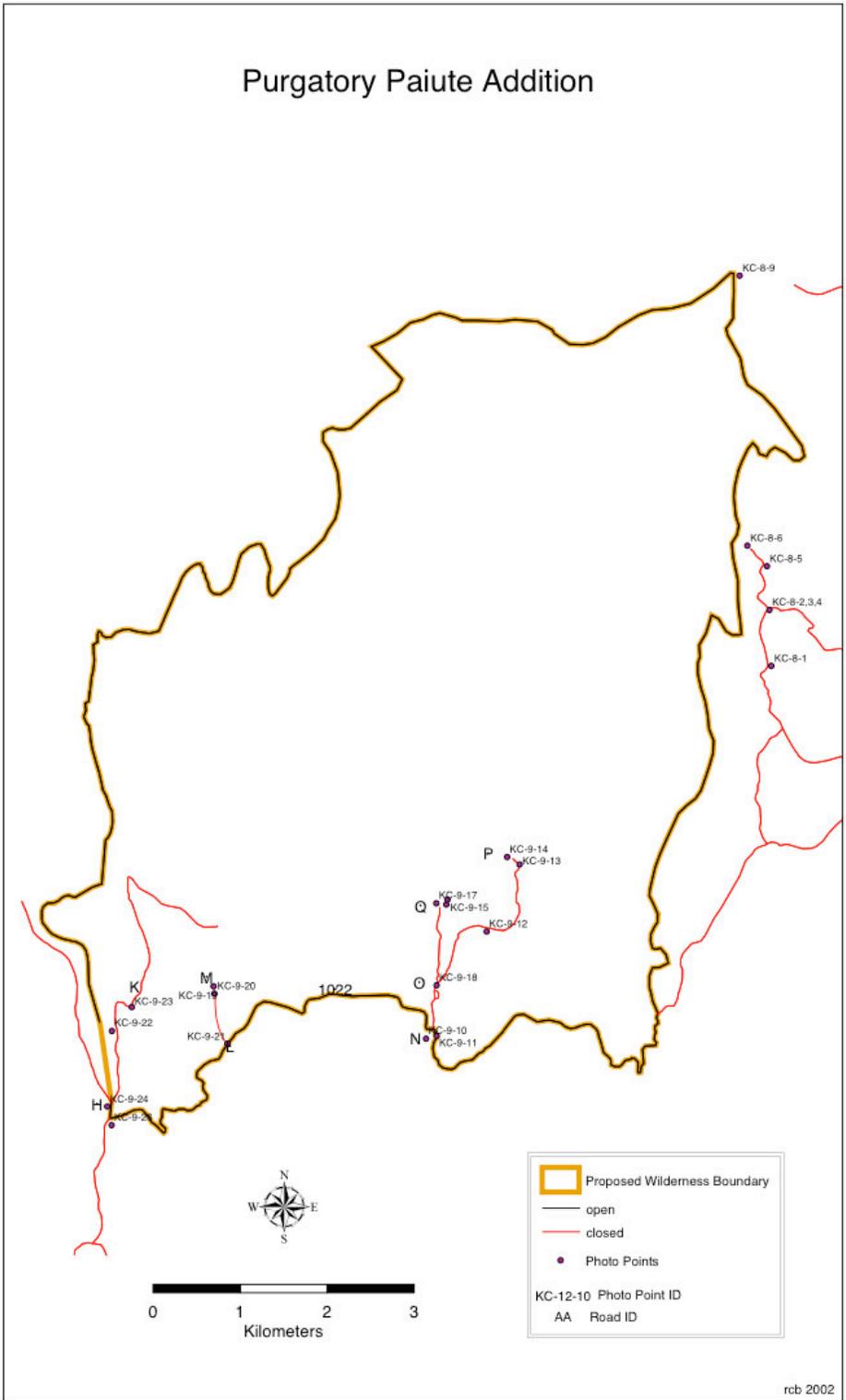
- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature

- Riparian corridors linking to the Colorado River corridor below, allowing wildlife movement and plant dispersal
- Diverse wildlife

4) Road Closures

- N-Q (T 41 N, R 13 W; section 33; 0.7 miles) goes to a water tank within a very small marsh that includes tamarisk. We suggest closing the route with special provisions for the permittee to conduct maintenance activities. The route is on the quad and the 2000 BLM map. The old travel way north of "Q" is closed to motorized vehicles by the BLM.
- O-P (1.5 miles; T 41 N, R 13 W; sections 33-34) is depicted as a jeep trail on the USGS quad but not the 2000 BLM map. The travel way provides access to a watering trough (empty at the time) and shows no evidence of regular use. We suggest closing the route to mechanized use, with provisions for the permittee.
- J-K (1.0 mile; T 40 N, R 14 W, section 1; and T 41 N, R 14 W, section 31) is presented on the USGS quad as a two-mile jeep trail. The route does not appear on the 2000 BLM map. This route is largely revegetated and shows no evidence of recent or regular use. It enters a large burn area and disappears in dense cheat grass with squirreltail and, at the time, numerous sego lily present. The route should be closed.
- L-M (0.5 miles; T 40 N, R 13 W, section 6) provides access to a small (30-50 gallon) water trough and salt blocks. It is not presented on the USGS or 2000 BLM map. The route continues northward, but is closed at "M" to motorized vehicular use. We recommend closing the route and moving the water trough the short distance to BLM Route 1022.

Purgatory Paiute Addition



Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Pakoon Proposed Wilderness (44,108 acres; Quads: Pakoon Springs, Virgin Peak, Red Pockets, and St. Thomas Gap).

Summary:

The Arizona Wilderness Coalition recommends the 44,108-acre proposed Pakoon Wilderness for Wilderness designation. A review of the 1979 "Overthrust Belt accelerated intensive inventory" process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Pakoon Wilderness consists of the former Cedar Wash Intensive Inventory Unit (1-115, 44,848 acres). This expansive wildland includes Cedar and Cottonwood Washes and numerous lava-capped plateaus. The area provides important wildlife values, including significant desert tortoise habitat.

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified Pakoon (Cedar Wash) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931])). The Overthrust Belt, a geologic formation, was thought to contain significant oil and gas reserves (USDI, BLM, 1980 Proposal Report, page 3). The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result, and apparently without further public documentation of the unit's wilderness character, the BLM dropped the entire Pakoon (Cedar Wash, 1-115) from further wilderness evaluation (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results").

The predictions of the Overthrust Belt's energy potential dissolved without any economically recoverable oil or gas deposits developed on the Arizona Strip. Since new information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed 44,108 -acre Pakoon Proposed Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity

as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Pakoon Wilderness, the answer to both questions is a resounding yes (photo TP-14-8A). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]. It's expansive grasslands, intricate drainages, and size creates a picturesque, rugged wilderness home to desert tortoise, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Pakoon's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). These consist of three abandoned travel ways (H-H1, U-V, and L-LL) and are in fact "substantially unnoticeable" (see discussion below; photo TP-14-20).

The principal proposed "road" closures within the proposed wilderness consist of four largely revegetated and little-used routes (E-D, E-F, GG-A and E1-E2). These travel ways should be closed to vehicular access and stabilized to protect Monument values. Agreements for essential maintenance of to the corral in along E-F (Section 8) can be developed under the minimum requirement process. One additional travel way proposed for closure is A-B-E1; a little-used travel way located outside of the proposed wilderness. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.² Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)³,

provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁴, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Pakoon Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential (photo TP-14-8). The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Pakoon's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- fossils, including invertebrate fossils.
- portions of geologic faults

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including...numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions throughout the monument
- Diverse wildlife
- Numerous threatened or endangered species including the desert tortoise (most of the proposed wilderness lies within the desert tortoise habitat; see USDI, BLM, 1998, Map 4).

3) Proposed Boundary

Beginning at the intersection of the Nevada-Arizona state line and State Route 101 (Virgin Peak Quad, T36N, R16W, Section 7); along 101 in an easterly direction (bypassing to the south and east Jacobs Ranch and corrals in Sections 9 and 4) to point "A1" in Section 4; then along segment A1-H-A2 to its junction with 101 at A2; then in a northeasterly direction along 101 to point "F1" in Section 23 (Red Pockets Quad; T37N, R16W); then along travel way F1-E1-R in an easterly direction to its junction with BLM Route 1027 in Section 20 (Red Pockets Quad; T37N, R15W); then along 1027 in a southerly direction to its junction with BLM Route 1007 in Section 23 (Cane Springs SE Quad; T36N, R15W); then along 1007 in a southerly then southwesterly direction to its junction with State Route 111 near Alan Well (Pakoon Springs Quad; T35N, R16W, Section 36); then along 111 in a northerly direction excluding Pakoon Springs private lands in Sections 24 and 25, and corrals in Section 2; then continuing in a northerly direction along 111 excluding the corral and steel tanks in Sections 26 and 27; then in a northwesterly direction along 111 to its intersection with the Nevada-Arizona state line in Section 18 (Virgin Peak Quad; T36N, R16W); then due north along the state line to its intersection with State Route 101 (Virgin Peak Quad, T36N, R16W, Section 7).

4) Travel Way Closures

- A-B-E1; a little-used travel way located outside of the proposed wilderness. The travel way begins off BLM Route 1027 in Section 19 (Red Pockets Quad, T37N, R15W; photo TP-13-19) and dead ends at a gate 0.9 miles later (Point "B", photo TP-13-20). Although depicted on the Pakoon Quad, the B-E1 portion could not be located. A-B-E1 is a little-used road to nowhere and should be closed to protect Monument values.
- E-D; continuation of cherry-stem C-E, this is a little used travel way that becomes severely eroded (photo TP-14-22; Section 17) approximately 0.9 miles from a corral in Section 9 (Red Pockets Quad, T36N, R15W). The eroded section should be stabilized with rock or log checks and the travel way closed to mechanized travel to protect monument values.
- H-H1; a travel way depicted on the Red Pockets Quad but not the BLM map (USDI 2000), begins as a faint two-track in Section 16 (photo TP-14-18) and appears little used or abandoned (photo TP-14-20). The travel way should be closed to mechanized travel and returned to a natural condition to protect monument values.

- E-F; a travel way depicted on the Red Pockets Quad but not the BLM map (USDI 2000). It begins at a corral in Section 9 (photo TP-14-6; T36N, R15W) and climbs to Cottonwood Ridge (photo TP-14-7), continuing on to a corral in Section 14. The travel way follows a wash and is susceptible to erosion (photo TP-14-9). The route appears little used and could easily return to a natural condition (photos TP-14-6,7 and TP-15-4,5). Two short spurs depicted on the quad (E3-F3, photo TP-15-3; and E4-F6, photo TP-15-6) appear little used as well. Agreements for essential maintenance of the corral in Section 6 can be developed under the minimum requirement process. The field staff could not locate the route depicted on the BLM map (2000) and the Pakoon Springs and Red Pockets Quads as following Cottonwood Ridge (beginning in Section 25 [Pakoon Springs Quad; T35N, R16W] in the southeast corner of the Pakoon Springs private sector; and ending near point "E2" in Section 8 (T36N, R15W) on the Red Pockets Quad). We assume it is abandoned and should be closed to protect monument values.
- GG-A; a travel way depicted on the BLM map (USDI 2000) and the Red Pockets and Pakoon Springs Quads. This is a little used travel way (photos TP-15-13,14,16) providing redundant access to the corral in Section 26 (Pakoon Springs Quad; T35N, R16W). It could easily return to a natural condition if closed to mechanized travel.
- U-V; the field staff could not discern a travel way depicted on the BLM map (USDI 2000) and the Pakoon Springs Quad as beginning in Section 2 (T35N, R16W) east of State Route 111 (just east of a corral) and continuing in an easterly then northerly direction into Sections 36 and 31 (R15W); then southerly to Section 17. This travel way should be removed from all maps.
- L-LL; the field staff could not discern a travel way depicted on the Red Pockets Quad as west of BLM Route 1007 (T36N, R15W, Section 22) and ending in the southwest corner of Section 28 (Pakoon Springs Quad). This travel way should be removed from all maps.
- E1-E2; a redundant, little-used travel way depicted on the BLM map (USDI 2000) and Red Pockets Quad as a jeep trail beginning in Section 25 (Red Pockets Quad, T37N, R16W) and continuing to Section 8 (T36N, R15W). The travel way should be closed to mechanized use to protect Monument values.
- A-B; a little used, redundant travel way beginning in Section 16 (Virgin Peak Quad, T36N, R16W) and traveling in a southerly direction to point "A" in Section 26 (Pakoon Springs, T36N, R16W).

5) Cherry Stems

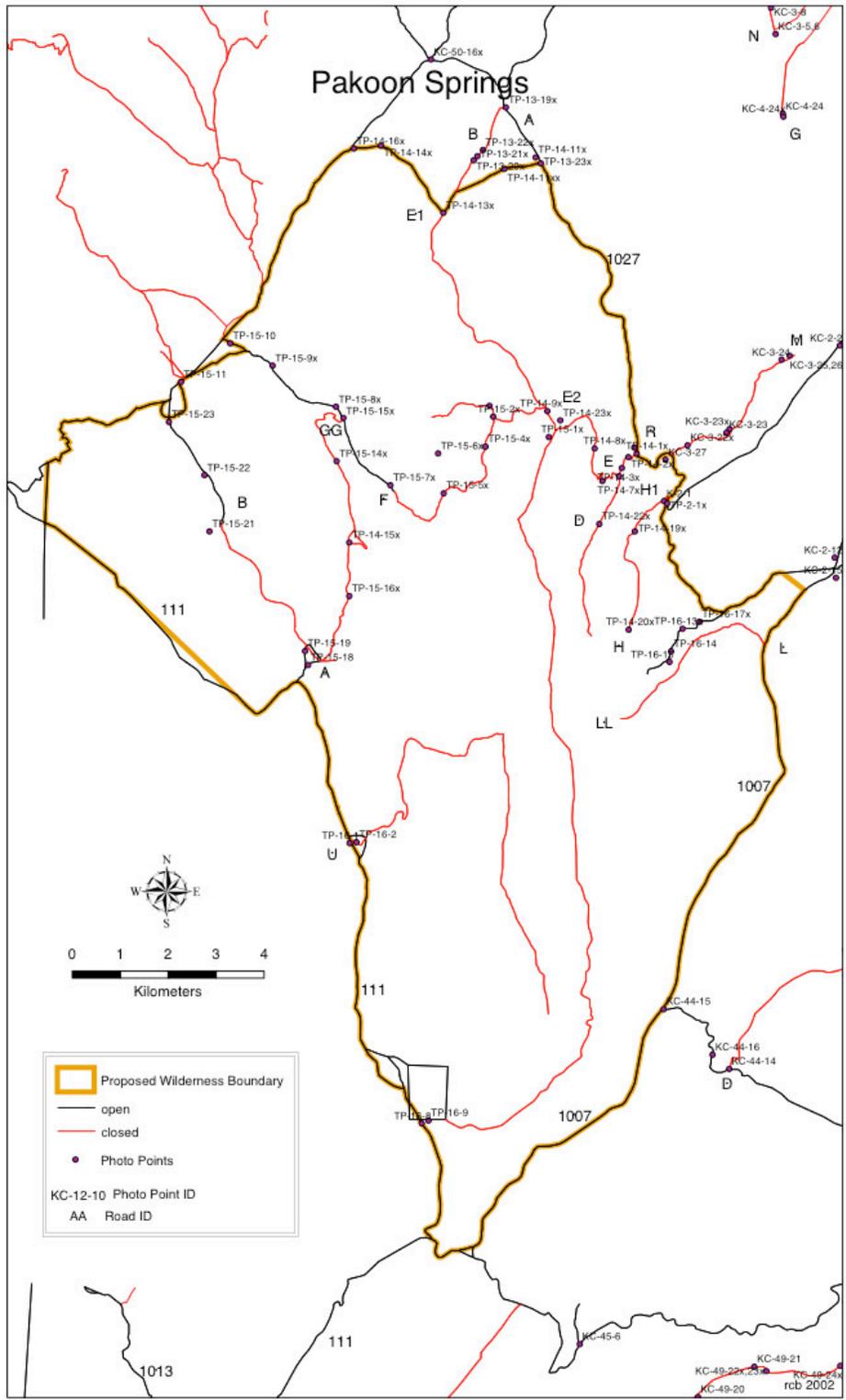
- C-E; 0.5-mile route off BLM Route 1027 to a corral in Section 9 (Red Pockets Quad, T36N, R15W).
- F-G (Cedar Wash); a two-mile route off State Route 101 near Cove Springs (Virgin Peak Quad, T36N, R16W, Section 3) and ending at the corral in Section 14 (Red Pockets Quad).
- Waynes Well; a 1.5-mile cherry stem beginning south of BLM Route 1027 in Section 22 (Red Pockets Quad; T36N, R15W) and ending at Waynes Well in Section 28).

¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

² The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

³ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁴ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.



PAKOON



1. TP-13-19; Red Pockets Quad, T37N, R15W, Section 19; view toward southwest of travel way A-B-E1 at its junction with BLM Route 1027 (point "A"). The route is barely discernable and substantially unnoticeable.



2. TP-13-20; Red Pockets Quad, T37N, R15W, Section 19; view toward west of point "B" gate. Travel way A-B-E1 vanishes.



3. TP-13-21; Red Pockets Quad, T37N, R15W, Section 19; view toward the northeast of travel way A-B-E1 "average condition." The route is generally revegetated and apparently little used.



4. TP-13-22; Red Pockets Quad, T37N, R15W, Section 19; view toward northeast of erosion on travel way A-B-E1.



5. TP-14-6; Red Pockets Quad, T36N, R15W, Section 9; view to the west of travel way E-F at point E (near corral). The travel way appears little used and revegetated.



6. TP-14-7; Red Pockets Quad, T36N, R15W, Section 8; view to the north of travel way E-F showing average condition.

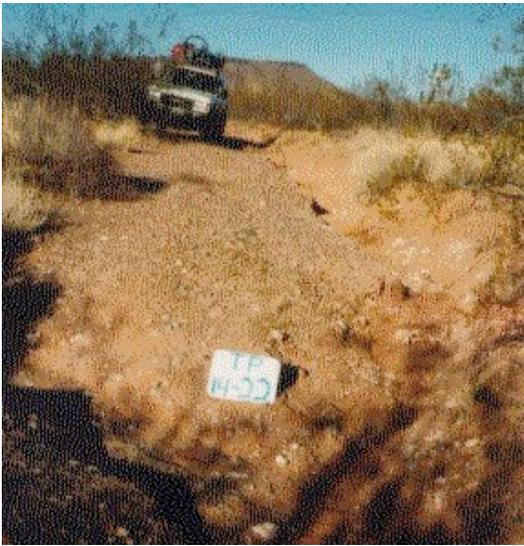
PAKOON (Cont.)



7. TP-14-9; Red Pockets Quad, T36N, R15W, Section 8; view toward the southeast of travel way E-F. The route follows a wash and is subject to erosion.



8. TP-14-18; Red Pockets Quad, T36N, R15W, Section 21; view to the west of junction of H-H1 with BLM Route 1027. The travel way is faint and appears little used or abandoned. TP-14-20; Red Pockets Quad, T36N, R15W, Section 21; view toward the north of travel way H-H1 at H1. Travel way is generally restored to a natural condition.



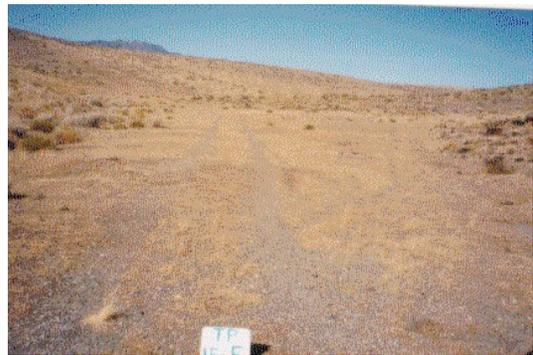
9. TP-14-22; Red Pockets Quad, T36N, R15W, Section 17; view to the north of an eroded section of travel way E-D.



10. TP-15-3; Red Pockets Quad, T36N, R15W, Section 6; view toward the northwest of travel E-F spur (E3-F3). This travel way appears little used or abandoned and is substantially unnoticeable.



11. TP-15-4; Red Pockets Quad, T36N, R15W, Section 7; view is north showing a little used travel way (E-F).



12. TP-15-5; Red Pockets Quad, T36N, R15W, Section 13; view of travel way E-F showing a little-used travel way.

PAKOON (Cont.)



13. TP-15-6; Red Pockets Quad, T36N, R15W, Section 12; view is toward the northwest of travel way E-F spur (E4-F6) and shows a little used or abandoned travel way.



14. TP-15-13; Red Pockets Quad, T36N, R16W, Section 11; view toward the south of travel way GG-A at point "GG," its junction with cherry stem F-G. The route appears little used.



15. TP-15-14; Red Pockets Quad, T36N, R16W, Section 11; view is toward the northwest of travel way G-A. The route is little used.



16. TP-15-16; Red Pockets Quad, T36N, R16W, Section 23; view is toward the northwest of erosion on travel way GG-A.

Grand Canyon- Parashant National Monument Wilderness Recommendation

Unit: Parashant Proposed Wilderness (Quads: Amos Point, Castle Peak, Cold Spring, Grassy Mountain, Mt. Dellenbaugh, Poverty Springs, Poverty Knoll, Price Point, Travertine Rapids, Whitmore Point, Whitmore Point SE, Whitmore Point SW, Yellow John Mountain).

Summary:

The Arizona Wilderness Coalition recommends the 231,061-acre Proposed Parashant Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that agency wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory supports the conclusion that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Parashant Wilderness consists primarily of three previous BLM WSAs: Parashant, Grassy Mountain, and Andrus Canyon; and four National Park Service "Proposed Wilderness" units: Shivwits Plateau (Kelly Point, Unit 33; 83,890 acres), Whitmore Point (Unit 32, 32,215 acres), Lava (Unit 36; 10,710 acres), and Andrus Point (Unit 34; 14,905 acres). The proposed Wilderness contains the northern 12 miles of the spectacular Parashant Canyon, a major tributary to the Grand Canyon (photos TP-2-Neg-4; TP-#-Neg-11,19). The extensive canyon and its tributaries, including Andrus Canyon (photo TP-11-Neg-9), and Grassy and Yellow John Mountains, offer good examples of Mojave and Great Basin desert vegetation. Desert grasslands and dense stands of pinyon and juniper woodlands dominate the rimlands.

B. Historical Review and Critique of the 1982 WSA Decision Process

1. Parashant (Unit 1-93; 38,938 acres)

In 1982, the BLM glowingly described the Parashant WSA's wilderness characteristics:

*The dense pinyon-juniper woodland combined with its large acreage provides **outstanding opportunities for solitude** [emphasis added]. The canyon and its rim provide outstanding scenery for sightseeing, hiking, and photography (USDI, BLM, 1982, Briefing Paper).*

In a subsequent document, the agency stated

*[t]he unit has remained in a **natural state**, containing **outstanding opportunities for both solitude and primitive and unconfined recreation**.... [and although the] unit has 12 miles of trails, a wildlife catchment, and a reservoir...*these imprints are **largely unnoticeable** and well dispersed throughout the unit* (emphasis added; USDI, BLM, 1982, EIS:50).*

In addition, the agency noted that Parashant "contains recorded archaeological sites, and is of particular geologic and scientific interest" (USDI, BLM, 1982, Briefing Paper).

In spite of its compelling wilderness character, the BLM "proposed as nonsuitable for wilderness designation" the entire Parashant WSA (38,938 acres) "because the unit lacks superior wilderness characteristics" (USDI, BLM, 1982, EIS:18).¹ Parashant's wilderness characteristics of "outstanding opportunities" for both solitude and a primitive and unconfined recreation, natural condition with imprints of man "largely [substantially] unnoticeable", and size met the mandatory requirements of the Wilderness Act, but not that of the local agency managers. While BLM's assessment of the Parashant WSA indicated lack of "superior" wilderness character, current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11). Parashant's past and current naturalness, size, and outstanding opportunities for solitude and a primitive and unconfined type of recreation support wilderness designation.

2. *Andrus Canyon* (1-96D; 48,288 acres)

In 1982, the BLM stated that the Andrus Canyon WSA "provides **outstanding opportunities for solitude and unconfined types of recreation**" (USDI, BLM, 1982, Briefing Paper).

The unit's few intrusions occur throughout the WSA and do not impact naturalness. The unit's deep canyons, washes, cliffs, and crags provide excellent topographic screening, and high plateau areas are covered with a pinyon-juniper woodland that provides vegetation screening...[t]he unit's large size also contributes to opportunities for solitude.... The WSA offers several types of primitive and unconfined recreation, including hiking, backpacking, horseback riding, hunting, photography, and rock climbing. The colorful rock formations and sheer cliffs. Small caves, and alcoves in Andrus and Dansil Canyons are a special attraction, as are the spectacular views across Andrus and Dansil Canyons into the outlying desert (USDI, BLM, 1982, EIS:50).

The agency noted that Andrus Canyon is

an integral portion of the lands and tributaries that adjoin the Grand Canyon...[and] provides many viewpoints of the Grand Canyon and its esplanade which are valuable for photography and sightseeing. Supplemental values include geology, scenery, and recorded archaeological sites (USDI, BLM, 1982, Briefing Paper).

In spite of Andrus Canyon's obvious and substantial wilderness character (naturalness, size, and outstanding opportunities for solitude and unconfined types of recreation), the entire unit was recommended as nonsuitable for wilderness designation: "The unit's overall wilderness quality is not superior" (USDI, BLM, 1982, EIS:18). Since current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative

rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11), and BLM's endorsement of wilderness character, the reference to lack of "superior" quality is unjustified.

Ignoring its own assessment of the areas extensive canyons and rugged topography (USDI, BLM, 1982, EIS:50), the agency stated "its outstanding wilderness characteristics are based on large expanses of pinyon and juniper woodland" (USDI, BLM, 1982, EIS:18). In any event, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). The agency's evaluation of Andrus Canyon, "an integral portion of the lands and tributaries that adjoin the Grand Canyon," supported a strong wilderness endorsement. The area possesses the requisite wilderness character to justify wilderness designation.

3. Grassy Mountain (1-96C; 5,503 acres)

In 1982, the BLM stated that Grassy Mountain WSA's "vegetation and topography provide **outstanding opportunities for solitude**" (emphasis added; USDI, BLM, 1982, EIS:50). The unit

is natural in appearance, its only human imprints consisting of a half-mile length of fence [emphasis added]. The 1,000-foot elevation change and many broken ridges provide topographic screening. Juniper and pinyon trees provide thick vegetation screening (USDI, BLM, 1982, EIS:50).

The BLM proposed Grassy Mountain as nonsuitable for wilderness designation (USDI, BLM, 1982, EIS:18): "The unit lacks superior wilderness characteristics, its opportunities for recreation are not outstanding, and it meets only minimum standards for size and solitude (USDI, BLM, 1982, EIS:18).

While the agency reported that Grassy Mountain "lacks superior wilderness characteristics" (USDI, BLM, 1982, EIS:18), current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11). The area met the Wilderness Act's "mandatory requirements" for naturalness and size, and current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). Grassy Mountain met this "minimum standard" for experiential quality by providing "outstanding opportunities for solitude" (USDI, BLM, 1982, EIS:50). The AWC submits that the agency's 1982 conclusions should have supported, not precluded wilderness designation.

C. AWC Recommendation

1) Proposed Boundary

Beginning in the northwest corner at the junction of BLM Routes 1018 and 1046 (Poverty Springs Quad; T35N, R12W, Section 34) and continuing along 1046 in a southerly direction to travel way K-L at point "K" (Wildcat Ranch Quad; T34N, R12W, Section 14); then along travel way K-L (east of 1046) to its junction with 1046 (point

"L") in Section 24; then along 1046 in a southerly direction to its junction with travel way H5-G5-G in Section 29 (Grassy Mountain Quad; T34N, R11W); then along travel way H5-G5-G in a westerly then northerly direction to point "G" (Red Pond) in Section 25; then in a westerly direction along travel way T-G (excluding Red Pond) to point "T" (Section 24); then along travel way T-O-P in a westerly direction to its intersection with State Route 101 (point "P") in Section 31; then in a southerly direction along 101 to its junction with travel way "N" (T33N, R12W, Section 4); then in an easterly and then southerly direction along travel way "N" to its intersection with the private property boundary (Wildcat Ranch); then in an alternating easterly and southerly direction to exclude the entire private sections to travel way "R" (Castle Peak Quad; T33N, R12W, Section 36); then along travel way "R" in an easterly then southerly direction to its intersection with the private land in Section 1(T32N, R12W); then in a easterly then southerly direction excluding the private property; then along the southern boundary of the private land in a westerly direction to its intersection with the R12W-R11W line; the due south along this line to its junction with the Lake Mead National Recreation (NRA) boundary at the northwest corner of Section 30 (T32N, R11W); then in an alternating southerly then westerly direction along the NRA boundary to its intersection with BLM Route 1019 (Mt. Dellenbaugh Quad; T31N, R12W, Section 5); then along 1019 in a southerly direction to the Twin Spring Canyon rim in Section 8); then in a generally easterly direction along the NRA and Grand Canyon National Park boundary to its intersection with the Mt. Logan Wilderness boundary in Section 17 (Mt. Logan Quad; T33N, R8W); then in a westerly direction along the NRA boundary to its intersection with the eastern rim of Parashant Canyon near BM 5375 in Section 18 (Cold Spring Quad; T33N, R9W); then in a northwesterly direction along the east rim of Parashant Canyon to Ivanpatch Wash (Grassy Mountain Quad; T34N, R11W, Section 14); then in a northeasterly direction along the east rim of Ivanpatch Wash to its intersection with BLM Route 1018 (Poverty Knoll Quad; T35N, R11W, Section 36); then along 1018 to its junction with BLM Route 1046 (Poverty Springs Quad; T35N, R12W, Section 34).

2) Mandatory Wilderness Characteristics (Wilderness Character)²

a) Size

The proposed 231,061-acre Parashant Wilderness meets the BLM's wilderness size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the

literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Parashant Wilderness, the answer to both questions is yes (see photos TP-2-Neg-4; TP-3-Neg-11,19; TP-11-Neg-9). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness... which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Parashant's human imprints include a mechanically treated areas, but most consist primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). Most imprints, as noted by the BLM and verified through recent citizen's inventories, are substantially unnoticeable (see discussion below in Travel Way Closures). There are, however, travel ways meeting the "road" definition that require closure to mechanized access to protect monument values and well as conform to wilderness criteria. AWC maintains that it is reasonable to assume past impacts created by the travel ways described below "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

The principal proposed "road" closures contain evidences of construction, but the routes appears to serve no essential use (see the discussions presented below). The other proposed "road" closures to stock tanks allow for essential maintenance to occur under application of the minimum requirement process (again, see discussion presented below). Provisions can be developed for removal of the features in the event the permittee prefers a voluntary retirement of the grazing lease.

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.³ Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)⁴, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁵, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be

restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Parashant's size, terrain variation ranging from the undulating juniper and pinyon forests to rugged canyons and cliffs, to expansive grasslands contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. The BLM's 1979-82 wilderness inventory describes in glowing terms the "outstanding opportunities" for solitude and an unconfined and primitive type or recreation. While the BLM unjustifiably dropped Parashant, Grassy Mountain, and Andrus Canyon from wilderness consideration in 1982, the recent citizen's inventory demonstrates the area's outstanding wilderness experiential potential (see photos TP-2-Neg-4; TP-3-Neg-11,19; TP-11-Neg-9). The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

3) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The agency emphasized that the area's "[s]upplemental values include geology, scenery, and recorded archaeological sites" (USDI, BLM, 1982, Briefing Paper). The BLM stated that the area composed

an integral portion of the lands and tributaries that adjoin the Grand Canyon...[and] provides many viewpoints of the Grand Canyon and its esplanade which are valuable for photography and sightseeing (USDI, BLM, 1982, Briefing Paper).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Parashant's "optional Wilderness Characteristics" and include:

- a) A remote area** consisting of
 - open, undeveloped spaces
 - engaging scenery
 - natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

- b) A geological treasure**, including
 - colorful, lava-capped Paleozoic strata against the highly faulted terrain
 - recent sinkholes and breccia pipes
 - fossils including invertebrate fossils.
 - portions of geologic faults

c) Important watersheds for the Colorado River and the Grand Canyon....

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including large concentrations of ancestral Puebloan villages, numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps. In fact, the agency earlier noted that Parashant "contains recorded archaeological sites, and is of particular geologic and scientific interest" (USDI, BLM, 1982, Briefing Paper).
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument", including...ranch structures and corrals... scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders; and several old mining sites dating from the 1870s, showing the history of mining during the late 19th and early 20th centuries.

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors linking the plateau to the Colorado River corridor below, allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

4) Travel Way Closures

- A2-B2 (Lake Mead NRA); this little-used (photo TP-6-17) travel way appears on the Lake Mead NRA wilderness map (USDI, NPS, 2001) and begins at the Whitmore Road (BLM Route 1045) in Section 11 (Whitmore Rapids Quad; T32N, R9W (see photo TP-6-16) and provides access to a cabin in Section 15 (photo TP-6-18). The beyond the cabin the travel way creates serious erosional problems (photo TM-15) and appears abandoned (photo TM-14). It should be closed to mechanized travel to protect Monument values. Access to the cabin for essential maintenance can be provided through the minimum requirement process.
- Paws Pocket (A4-B4; Lake Mead NRA); east of Paws Pocket cabin, is depicted on the Lake Mead NRA wilderness map (USDI, NPS, 2001). The travel way appears to provide only occasional access (photo TP-7-8 to the water tank in section 5 (photo TP-7-9). Beyond the tank, the travel way appears abandoned or very infrequently used (photos TP-7-10,11) and is closed at the Grand Canyon National Park boundary. This section should be closed to mechanized travel to protect Monument values.

Access to the tank for essential maintenance can be provided through the minimum requirement process.

- A3-B3 (Lake Mead NRA); is depicted on the Lake Mead NRA wilderness map (USDI, NPS, 2001). It is an eroded (photo TP-7-3), little-used (photo TP-7-3) travel way to a stock tank. It should be closed to mechanized travel to protect Monument values. Access to the stock tank for essential maintenance can be provided through the minimum requirement process.
- A1-B1 (Lake Mead NRA); is depicted on the Lake Mead NRA wilderness map (USDI, NPS, 2001). It is an eroded (photo TP-6-14), little-used (photo TP-6-11,1,13) travel way to a stock tank. The travel way defines a non-wilderness area contiguous with the existing Mt. Logan Wilderness. A1-B1 should be closed to mechanized travel to protect Monument values. Access to the stock tank for essential maintenance can be provided through the minimum requirement process.
- Jeep Trail not on the BLM map (USDI, BLM, 2000) but depicted on the Grassy Mountain and Poverty Knoll quads as beginning off of BLM Route 1018 (Poverty Knoll Quad; T34N, R11W, Section 2) and ending in Section 10 (Grassy Mountain Quad). Field staff could not locate this travel way. It should be removed from the quads.
- AA3-BB3; an abandoned, generally revegetated (photo TP-12-16) travel way network depicted on the BLM map (USDI, BLM, 2000) and the Grassy Mountain Quad in Section 1 and 2 (T33N, R11W). It is severely eroded in sections which should be stabilized with water bars and primitive drainage berms. The travel way should be closed to all mechanized travel to protect monument values.
- GG-HH; this road to nowhere depicted on the BLM map (USDI, BLM, 2000) begins off of BLM Route 1046 (T34N, R11W, Section 27; photo TP-13-8). It is little used (photos TP-13-11), eroding (photo TP-13-13) and completely vanishes in Section 25 (photo TP-13-12). A short spur (JJ-KK) is also little used and abruptly ends (photo TP-13-15). These travel ways should be closed to mechanized travel and restored to a natural condition.
- AA-BB-AA2-BB2 (Grassy Springs); a little used (photos TP-12-1,9,12), eroding (photos TP-12-2,14) access to an abandoned cabin (photo TP-12-4) and the Grassy Springs catchment in Section 9 (Grassy Mountain Quad; T33N, R11W; photo TP-12-13). The route should be closed to mechanized travel to protect monument values. Access for essential maintenance to the spring catchment can be addressed through the minimum requirement process.
- CC-DD; an abandoned travel way (photos TP-12-17,18) depicted on the Grassy Mountain Quad but not the BLM map (USDI, BLM, 2000). It should be closed to mechanized use and restored to a natural condition to protect Monument values.
- EE-FF; an eroding (photo TP-13-5), little used or abandoned travel way (photos TP-13-7,4) off of BLM Route 1046 beginning in Section 2 (Grassy Mountain Quad; T34N, R11W). It should be closed to mechanized travel to protect monument values.
- AA2-BB; an eroding (photo TP-12-7), redundant, little used travel way (photo TP-12-8) off of BLM Route 1048 (Grassy Mountain Quad; T33N, R11W, Section 12). It should be stabilized with water bars and primitive drainage features, and closed to mechanized travel to protect Monument values.

- W2-X2; an abandoned "road to nowhere" off of BLM Route 1048 that is substantially unnoticeable (photos TP-11-14,15. It should be closed to mechanized use to protect monument values.
- GF-H; a travel way to Andrus Spring beginning at a stock tank in Section 6 (Wildcat Quad; T33N, R11W; photo TP-8-9). The spring vicinity should be cleaned up (see photo TP-8-11. The travel way is little used (photo TP-8-10) and should be closed to protect Monument values. Permittee access for essential maintenance of the springs and pipeline can be arranged through the minimum requirement process.
- G1-H1; an eroding (photo TP-8-14), little used travel way to nowhere (photos TP-8-13-15) that should be closed to mechanize travel to protect Monument values.
- G2-H2; an eroding (photos TP-8-18,19,24) travel way to an abandoned corral in Section 16 (Grassy Mountain Quad; T33N, R11W; photo TP-8-20). The route directly impacts a known archeological site (photo TP-8-18). An abandoned spur descends to the Grassy Springs in Section 9. This travel way to nowhere (the corral is abandoned) should be stabilized with water bars and primitive drainage berms. It should be closed to mechanized travel to protect Monument values.
- I-J; an abandoned, largely revegetated (photos TP-9-8,9,10) travel way depicted on the BLM map (USDI, BLM, 2000), beginning at point I (Grassy Mountain Quad, T34N, R11W, Section 28) and ending at point J (Wildcat Ranch Quad, T34N, R11West, Section 19). This travel way to nowhere should be closed to mechanized travel and allowed to continue natural restoration.

5) *Cherry Stems*

- Paws Pocket (Lake Mead NRA); a route to a cabin in State Section 36 (Whitmore Rapids Quad; T33N, R9W).
- Parashant Canyon-Dripping Springs; a route beginning at the eastern rim of Parashant Canyon (Cold Springs Quad; T34N, R10W, Section 35) and ending near Dripping Springs (Yellow John Mountain Quad; T32N, R10W, Section 20) with a spur route to "Copper Mountain Mine (Whitmore Point Quad, T32N, R10W, Section 14).
- G5-GF tank access in Section 31 (Wildcat Ranch Quad; T34N, R11W).
- BLM Route 1046; beginning in Section 29 at point "H5" (Grassy Mountain Quad, T34N, R11W) and extending into the Andrus Canyon overlooks and a stock tank in Lake Mead National Recreation Area.
- Kelly Point (Lake Mead National Recreation Area); an extension of State Route 103.

¹ The unit was found neither suitable nor recommended in either Step I or Step II (USDI, BLM, 1982, Briefing Paper).

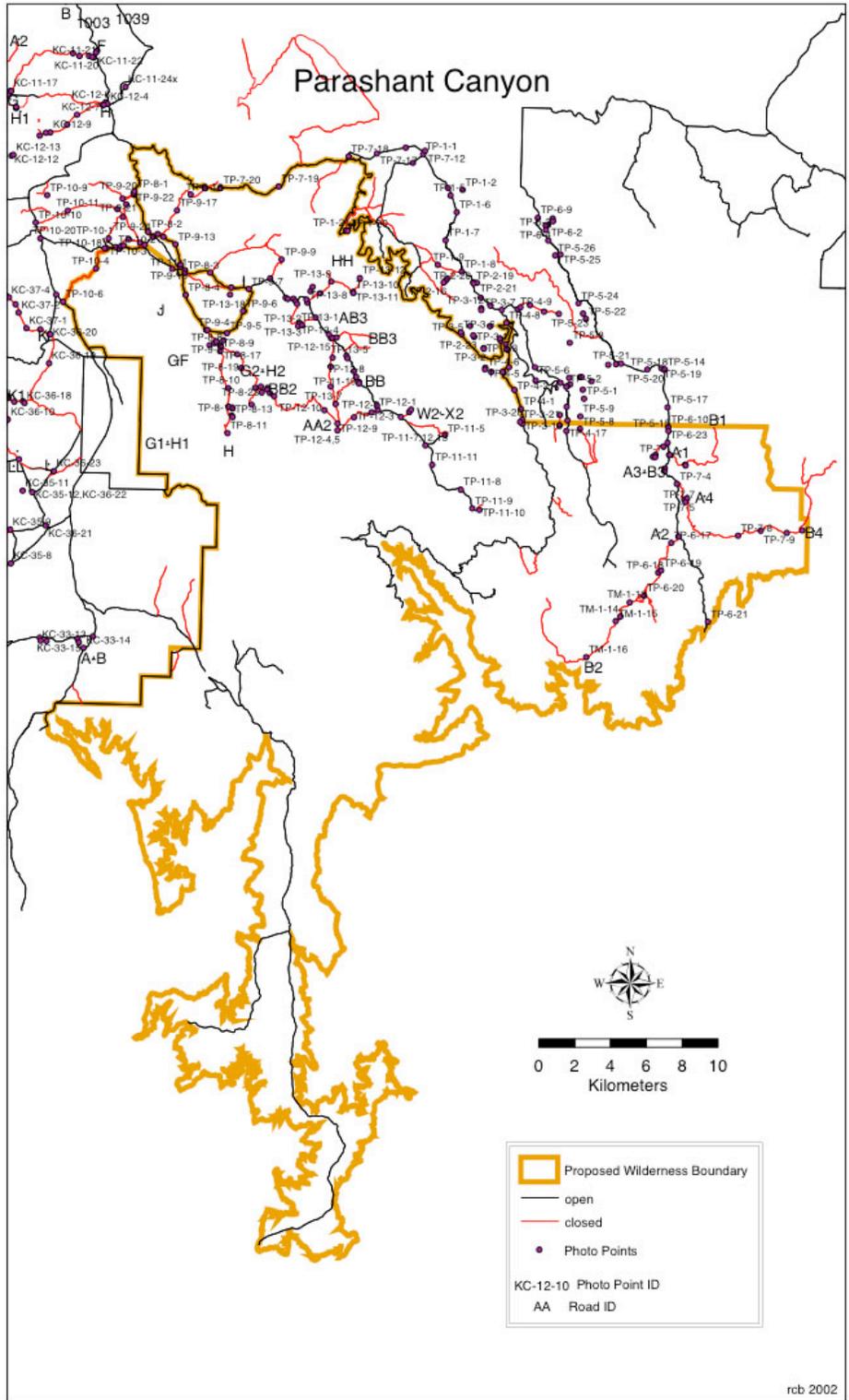
² "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

³ The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

⁴ "Definition of Wilderness ," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding

opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁵ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.



PARASHANT



1. TM-14; Whitmore Point Quad; T32N, R9W, Section 21; travel way A2-B2 is generally vague and appears little used.



2. TM-15; Whitmore Point Quad; T32N, R9W, Section 21; view of erosional problems of travel way A2-B2 at wash crossings.



3. TP-2-Neg-4; Parashant Canyon near Mule Point.



4. TP-3-Neg-11; Parashant Canyon.



5. TP-3-Neg-19; Parashant Canyon.



6. TP-6-16; Whitmore Rapids Quad; T32N, R9W, Section 11; view of junction of travel way A2-B2 (Frog Springs) with BLM Route 1045 at point A2.

PARASHANT (Cont.)



7. TP-6-17; Whitmore Rapids Quad; T32N, R9W, Section 2; travel way A2-B2 route condition.



8. TP-6-18; Whitmore Rapids Quad; T32N, R9W, Section 15; cabin at end of travel way A2-B2.



9. TP-7-5; Whitmore Rapids Quad; T33N, R9W, Section 36; view is of the cabin in the state section.



10. TP-7-8; Whitmore Rapids Quad; T32N, R8W, Section 6; view toward the east of travel way A4-B4 east of Paws Pockets. The route is a little used access to a tank in Section 5. Note the ATV track to the left.



11. TP-7-9; Whitmore Rapids Quad; T32N, R8W, Section 5; view toward the east of tank on travel way A4-B4.



12. TP-7-10; Whitmore Rapids Quad; T32N, R8W, Section 4; view toward the northeast of a little used or abandoned section of travel way A4-B4.

PARASHANT (Cont.)



13. TP-7-11; Whitmore Rapids Quad; T32N, R8W, Section 4; view toward the northeast of a little used or abandoned section of travel way A4-B4. The travel way is closed at the Grand Canyon National Park Boundary.



14. TP-8-9; Wildcat Quad; T33N, R11W, Section 6; view is toward the southeast of the tank supplied from Andrus Spring.



15. TP-8-10; Wildcat Ranch Quad; T33N, R11W, Section 8; view is toward the southeast of travel way GF-H (Andrus Springs).



16. TP-8-11; Castle Peak Quad; T33N, R11W, Section 20; view is toward the southeast of the end of travel way GF-H at Andrus Spring.



17. TP-8-13; Grassy Mountain Quad; T33N, R11W, Section 17; view is toward the east of travel way G1-H1 at point G1. Route appears little used.



18. TP-8-15; Grassy Mountain Quad; T33N, R11W, Section 17; view toward the east of travel way G1-H1. The travel way is substantially unnoticeable.

PARASHANT (Cont.)



19. TP-8-17; Wildcat Ranch Quad; T33N, R11W, Section 6; view is toward the southeast of the junction of travel way G2-H2 and travel way G5-GF.



20. TP-8-18; Grassy Mountain Quad; T33N, R11W, Section 5; view is toward the southeast of an average condition for travel way G2-H2. The travel way impacts an archaeological site.



21. TP-8-19; Grassy Mountain Quad; T33N, R11W, Section 8; view toward the northwest of an eroding section of travel way G2-H2.



22. TP-8-20; Grassy Mountain Quad; T33N, R11W, Section 16; view toward the southeast of an abandoned corral.



23. TP-8-21; Grassy Mountain Quad; T33N, R11W, Section 17; view toward the southwest of the end of travel way G2-H2.



24. TP-8-24; Grassy Mountain Quad; T33N, R11W, Section 8; view toward the northeast of a severely eroded section of travel way G2-H2.

PARASHANT (Cont.)



25. TP-9-8; Grassy Mountain Quad; T34N, R11W, Section 28; view toward north of travel way I-J at point "I," the southern junction with BLM Route 1046. The travel way is very indistinct.



26. TP-9-9; Grassy Mountain Quad; T34N, R11W, Section 21; view toward the north of travel way I-J. The route appear abandoned and is "substantially unnoticeable."



27. TP-9-10; Wildcat Ranch Quad; T34N, R11W, Section 19; view is eastward of the northern junction of travel way I-J with BLM Route 1046. The travel way is very indistinct.



28. TP-11-Neg-9; view of Andrus Point and Canyon.



29. TP-11-14; Grassy Mountain Quad; T33N, R10W, Section 17; view is toward the northeast of an abandoned travel way to nowhere that is substantially unnoticeable.



30. TP-11-15; Grassy Mountain Quad; T33N, R10W, Section 17; view is toward the south of an abandoned travel way that is substantially unnoticeable.

PARASHANT (Cont.)



31. TP-12-1; Grassy Mountain Quad; T33N, R11W, Section 18; view toward the southwest of the junction of BLM Route 1046 with travel way AA-BB. The route appears little used.



32. TP-12-2; Grassy Mountain Quad; T33N, R11W, Section 18; view toward the northeast of an eroding section of travel way AA-BB.



33. TP-12-4; Grassy Mountain Quad; T33N, R11W, Section 23; view toward the east of abandoned cabin along travel way AA-BB.



34. TP-12-7; Grassy Mountain Quad; T33N, R11W, Section 14; view toward the west of eroding travel way AA2-BB.



35. TP-12-8; Grassy Mountain Quad; T33N, R11W, Section 12; view toward the south of the junction of travel way AA2-BB at point BB (BLM Route 1046). The travel way is little used and substantially unnoticeable along most of its length.



36. TP-12-9; Grassy Mountain Quad; T33N, R11W, Section 23; view toward the northwest of travel way AA2-BB2 (Grassy Springs).

PARASHANT (Cont.)



37. TP-12-12; Grassy Mountain Quad; T33N, R11W, Section 9; view toward the southeast of the end of travel way AA2-BB2 at the base of the escarpment near Grassy Springs.



38. TP-12-13; Grassy Mountain Quad; T33N, R11W, Section 9; view toward the southeast of Grassy Springs containment feature.



39. TP-12-14; Grassy Mountain Quad; T33N, R11W, Section 16; view toward the southwest of a severely eroding section of travel way AA2-BB2.



40. TP-12-16; Grassy Mountain Quad; T33N, R11W, Section 2; view is of travel way AA3-BB3 near its junction with BLM Route 1046.



41. TP-12-17; Grassy Mountain Quad; T34N, R11W Section 27; travel way CC-DD at its northern junction with BLM Route 1046. It appears abandoned and is substantially unnoticeable.



42. TP-12-18; Grassy Mountain Quad; T34N, R11W Section 27; travel way CC-DD appears abandoned and is substantially unnoticeable.

PARASHANT (Cont.)



43. TP-12-20; Grassy Mountain Quad; T34N, R11W Section 35; travel way CC-DD at its southern junction with BLM Route 1046. It appears little used and is substantially unnoticeable throughout most of its length.



44. TP-12-20; Grassy Mountain Quad; T34N, R11W Section 35; travel way CC-DD at its southern junction with BLM Route 1046. It appears little used and is substantially unnoticeable throughout most of its length.



45. TP-13-5; Grassy Mountain Quad; T33N, R11W, Section 2; view toward the northwest of a severely eroded section of travel way EE-FF.



46. TP-13-7; Grassy Mountain Quad; T33N, R11W, Section 11; view toward the northwest of travel way EE-FF. This route is substantially unnoticeable.



47. TP-13-8; Grassy Mountain Quad; T34N, R11W, Section 27; view toward the northeast of travel way GG-HH at point GG (BLM Route 1046).



48. TP-13-8; Grassy Mountain Quad; T34N, R11W, Section 27; view toward the northeast of travel way GG-HH at point GG (BLM Route 1046).

PARASHANT (Cont.)



49. TP-13-12; Grassy Mountain Quad; T34N, R11W, Section 25; view is toward the southwest of travel way GG-HH. The travel way completely disappears and remains substantially unnoticeable.



50. TP-13-13; Grassy Mountain Quad; T34N, R11W, Section 26; view is toward the northeast of an eroding section of travel way GG-HH.



52. TP-13-15; Grassy Mountain Quad; T34N, R11W, Section 27; view is toward the west of a short spur (JJ-KK) off of travel way GG-HH

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Pigeon Canyon Proposed Wilderness (Quads: Azure Ridge, Grand Gulch Bench, Gyp Hills, and Pakoon Springs).

Summary:

The Arizona Wilderness Coalition recommends the 55,966-acre Proposed Pigeon Canyon Wilderness for Wilderness designation. A review of the 1979-82 WSA process reveals wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's current wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Pigeon Canyon wilderness encompasses the former Pigeon Canyon WSA (1-109; 33,988 acres) and Little Arizona inventory unit (1-108 [labeled 106 on Map, USDI, BLM, 1979, September] 16,930 acres). Except for the eastern cliff and Grand Gulch Bench regions, both areas lie within the Pakoon ACEC, an area managed primarily for the recovery of desert tortoise (USDI, 1998, page 5 and Map 4).

Several distinct topographic areas including the Gyp Hills, desert plains, and washes, Pigeon and North Fork Canyons, the Grand Wash Cliffs and plateau regions. (USDI, BLM, 1982, Briefing Paper). Elevation ranges from 2,300 feet in the Gyp Hills and desert to 4,600 feet on the Grand Wash Cliffs. An imposing topographic feature, the Grand Wash Cliffs, dominates the scenery. On top the vegetation consists predominately of blackbrush and pinyon-juniper. Pigeon Canyon itself cuts through the majestic cliffs six miles into the Grand Gulch Bench, revealing an extensive, scenic web of ten side canyons including North Fork Canyon (see USDI, BLM, 1982, Briefing Paper).

Beneath the Grand Wash Cliffs lies the Gyp Hills, an austere, intricate badlands of extensive microbiotic crusts, and fragile landforms of soft shale. It is also important desert tortoise habitat (USDI 1988, Mojave Desert Amendment, Map 4). Within the proposed wilderness are landscapes of desert plains and hills intricately broken by countless washes, providing habitats of creosotebush, Joshua trees, cacti, and grasses and other desert vegetation (USDI, BLM, 1982, EIS:51).

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1982, the BLM stated that the former Pigeon Canyon WSA

provides outstanding opportunities for primitive and unconfined recreation, including opportunities to hike and explore the geology and biological communities of the desert, gyp hills, canyons, cliff, and bench [emphasis added]. From atop the bench a visitor can hike along the rim of the Lower Grand Wash Cliffs to observe this major geologic fault and view the Pakoon Basin below, the Virgin Mountains to the north, and Lake Mead to the southwest (USDI, BLM, 1982, EIS:52; emphasis added).

The agency enthusiastically noted the region "provides excellent opportunities for solitude throughout" and:

*The badlands in the unit's western part are a maze of gypsum hills, mounds, and gullies in which one can avoid the sights and sounds of others. The desert plains and bajada around the gyp hills and below the cliffs offer a complex topography of rough hills and ravines and 22 square miles in which to experience solitude. Pigeon Canyon itself is a maze of nine side canyons that provide an **outstanding opportunity for solitude** (emphasis added). From the Grand gulch Bench, the canyon extends six miles west through the Lower Grand Wash Cliffs. At this point the canyon is 1,400 feet deep. Pinyon-juniper provides effective screening in some locations on top of the bench and cliffs (USDI, BLM, 1982, EIS:51-2).*

WSA In another related document, the BLM reiterated this assessment. Pigeon Canyon

*Possesses **outstanding opportunities for solitude and unconfined types of recreation** (emphasis added). The major impact to naturalness is uranium exploration in the southwest...the remaining portion retaining its naturalness and is exemplary of natural desert ecosystems. The major features such as Pigeon Canyon and the seven miles of Lower Grand Wash Cliffs provide a true feeling of wilderness...supplemental features are the same as the unit on its south side (105A) including geology, historical and cultural sites, wildlife species, and outstanding scenery (USDI, BLM, 1982, Briefing Paper).*

Under the Shivwits MFP Step I "Enhanced Wilderness" alternative, the BLM recommended 21,404 acres of Pigeon Canyon WSA as suitable for wilderness designation. The eastern portion of the unit in particular was

*recommended for designation because of its **outstanding wilderness characteristics** (emphasis added). Wilderness designation would protect scenic values, threatened and endangered plants, and desert bighorn sheep and desert tortoise habitat. The western half is not recommended because of exploration impacts, existing trails, and 600 acres of state land (USDI, BLM, 1982, EIS:20; USDI, BLM, 1982, Briefing Paper).*

In spite of the agency's convincing argument for wilderness, at least for the eastern section, the Shivwits MFP Step II recommended the entire WSA as nonsuitable for wilderness designation (USDI, BLM, 1982, EIS:20; USDI, BLM, 1982, Briefing Paper).

This WSA contains know energy mineralization. The unit's geological formations were identified in a 1980 Department of energy study as favorable for vein or breccia type deposits of mineral concentration. The unit has 53 mining claims and 640 acres of state land (USDI, BLM, 1982, EIS:51-2).

Step I of the MFP process concluded "...the western half not recommended due to the exploration impacts, existing trails, and 600 acres of state land " (USDI, BLM, 1982, EIS:20; USDI, BLM, 1982, Briefing Paper). The agency acknowledged acquisition of states state land would "assure wilderness management" (USDI, BLM, 1982, EIS:20). While the area contained "...53 existing mining claims" and "640 acres of nonfederal mineral estate" (USDI, BLM, 1982, Briefing Paper). The agency continually stressed that

Numerous trails remaining from uranium exploration in the southwest portion present manageability problems that could present potential problems...The area was mechanically rehabilitated, however, rehabilitation by natural forces will take many years (USDI, BLM, 1982, Briefing Paper).

One of the five wilderness criteria supposedly considered in the earlier inventory process included "the unit's potential for returning to its natural condition if there had been human activity in the unit" USDI, BLM, 1979, Preliminary Findings, page 3). Current BLM policy recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Pigeon Canyon's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). After an additional twenty years of natural rehabilitation, these former "trails" are in fact "substantially unnoticeable." AWC maintains that it is reasonable to assume past impacts created by the travel ways described above "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In addition, the BLM stated that

544,000 acres of similar country (location not disclosed) are already included in the National Wilderness Preservation System, and 938,000 more similar acres are included in administratively endorsed wilderness areas (Grand Canyon?). One of the areas lies within 10 miles. Designating this WSA would neither add to the diversity of the system nor improve upon the distribution of wilderness areas within the system (USDI, BLM, 1982, EIS:20).

Current BLM policy stresses that each inventory unit must be assessed on its own merits or in combination with an adjacent wilderness area or wilderness study area (USDI 2001 [H-6310-1, Section .13(B)(3)(b), page 13]) including other federal agencies such as the NPS (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]). Proximity and similarity to other wilderness areas enhances, not detracts from, the unit's wilderness character. Current BLM policy prohibits comparisons, numerical, alphabetical, or qualitative rating systems. Even under the earlier criteria, the unit should have been recommended for wilderness designation and not dropped from wilderness consideration.

Little Arizona

The BLM described the "Little Arizona" inventory unit as "a broad alluvial plain cut by many washes and covered with creosote, cacti and related species" (USDI, BLM, 1979a). The agency also noted "the three roads were found to be ways" and committed to further study of the area's naturalness. During the "Intensive Wilderness Inventory," the agency dropped Little Arizona from wilderness consideration:

This unit does not exist in a natural condition. There are several roads that cross the unit....The imprint of man's activity is substantially noticeable throughout the unit, and the opportunities for solitude and primitive recreation were not determined to be outstanding, and several roads divide the unit into segments less than 5,000 acres.¹

The proposed Pigeon Canyon Wilderness, including the Little Arizona region, lies within the Pakoon Area of Critical Environmental Concern (ACEC), an area "managed primarily for recovery of the [desert] tortoise population" (USDI, BLM, 1998, page 5). It meets the "naturalness" criteria required by the BLM (see "Naturalness" discussion below). The proposed travel way closures (also discussed below) and eventual wilderness designation, will provide significant additional protection for the tortoise population, as well as other Monument values such as soil, microbiotic crusts, other wildlife, and native vegetation. In any event, the presence of a "road" does not necessarily preclude an area for wilderness designation (see "Naturalness" discussion below). BLM policy provides for wilderness consideration when it is reasonable to assume past impacts "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor," (USDI 2001 [H-6310-1, Section .13(D), page 17]).

Little Arizona contains a spring complex, including Whiskey, Buckhorn, Grapevine, Little Arizona and Black Willow Springs. Desert springs are likely biological "hot spots" providing "spatially rare habitats that support disproportionately high levels of species density and most of the regions rare and endemic species" (see Grand Canyon Wildlands Council, 1999, page 4; and Stevens and Burke, 2000, pages 24-32). Wilderness designation would afford additional significant protection for these Monument resources.

While the agency stated Little Arizona lacks outstanding opportunities for solitude or a primitive and unconfined type of recreation, recent citizen's inventories support the opposite conclusion. In any event, this unit is included with the Pigeon Canyon unit which unquestionable possesses the requisite qualities. The agency requires outstanding opportunities for solitude or a primitive and unconfined type of recreation "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]).

C. AWC Recommendation

1) Proposed Boundary

The proposed wilderness begins at its northeastern corner at the junction of BLM Route 1050 with BLM Route 1002 (Grand Gulch Bench Quad; T34N, R14W, Section 10); continuing in a southerly direction along BLM Route 1002 and excluding the Grand Gulch Mine and landing strip in sections 21,22,27, and 28; continuing in an easterly direction along BLM Route 1012 (Mustang Point Quad, T34N, R14W, Section 36) and then along BLM Route 1012 in a westerly direction to its junction with an unnumbered route (Pigeon Canyon Road, marked "G" on the AWC master quad; Grand Gulch Bench Quad, T33N, R14W, Section 2); then continuing in a westerly direction along route "G" (excluding Savanic Mine) to its junction with the Lake Mead National Recreation Area boundary (Gyp Hills Quad, T33N, R15W, Section 9) where the route becomes NRA Route 153; continuing in a westerly then northerly direction to its junction with NRA Route 152B in Section 32 (T34N, R15W); then in a southerly direction to its junction with NRA Route 152A (T33N, R15W, Section 7); then in a westerly direction to its junction with NRA Route 150 (Azure Ridge Quad, T33N, R16W, Section 10); then in a northerly direction passed the Lake Mead National Recreation Boundary in Section 3 where the route becomes State Route 103; continuing in a northerly direction to the junction with State Route 111 (Azure Ridge Quad; T34N, R16W, Section 15); continuing in a northerly direction to the junction with BLM Route 1007 (Pakoon Springs Quad; T35N, R16W, Section 36); then continuing in an easterly direction to the junction with BLM Route 1050 (T35N, R15W, Section 31); then continuing in a easterly direction along BLM Route 1050 to the junction with BLM Route 1002.

2) Mandatory Wilderness Characteristics (Wilderness Character)²

a) Size

The proposed 55,966-acre Pigeon Canyon wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.³

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs the agency to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Pigeon Canyon Wilderness, the answer to both questions is yes (KC-48-24; KC-49-21, 22). The area "...generally appears to have been affected

primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness... which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Pigeon Canyon's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]) and are in fact "substantially unnoticeable." AWC maintains that it is reasonable to assume past impacts created by the travel ways described above "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]). The principal proposed "road" closures lie within the "Little Arizona" region and are necessary to protect wildlife (including desert tortoise), native vegetation, soils and microbiotic crust and perhaps the most significant desert spring complex in the Mohave desert portion of the Monument.

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.⁴ For another example, Congress designated the Grand Wash Cliffs WSA (also recommended by the BLM as nonsuitable for wilderness designation; USDI, BLM, 1982, EIS:20) as wilderness in 1984 and included the eight-mile "road" separating the former Grand Wash Cliffs WSA from Last Chance WSA. That road is now a hiking trail.

Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)⁵, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁶, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Pigeon Canyon Wilderness size, terrain variation ranging from the Gyp Hills' softly undulating badlands to rugged canyons and the imposing Grand Wash Cliffs contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation.

The BLM requires evaluation of the area's "outstanding⁷ opportunities⁸ for solitude⁹ or a primitive and unconfined type or recreation"¹⁰ as specified by Section 2(c) of the Wilderness Act. The agency states the area need not provide outstanding opportunities for both solitude and wilderness¹¹ recreation, it "has only to possess one or

the other"(USDI 2001 [H-6310-1, Section .22(A)(1)(b), page 21]). The BLM stresses that each inventory unit must be assessed on its own merits or in combination with an adjacent wilderness area or wilderness study area (USDI 2001 [H-6310-1, Section .13(B)(3)(b), page 13]). Comparisons are not permitted nor are numerical, alphabetical, or qualitative rating systems. Note that the agency requires outstanding opportunities for solitude or a primitive and unconfined type of recreation "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]).

The BLM stressed Pigeons Canyon's "outstanding opportunities" for solitude and a primitive and unconfined type of recreation [USDI, BLM, 1982, EIS:51-2; USDI, BLM, 1982, Briefing Paper]. Those qualities exist today (KC-48-24; KC-49-21,22).

3) *Optional Wilderness Characteristics*

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Pigeon Canyon's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- colorful Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils including invertebrate fossils.
- portions of geologic faults, including...the Grand Wash fault.

c) Important watersheds for the Colorado River and the Grand Canyon....

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument", including...ranch structures and corrals...

scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders.

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors linking the plateau to the Colorado River corridor below, allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl, the California condor, the desert tortoise (most of the proposed wilderness lies within the desert tortoise habitat; see USDI, BLM, 1998, Map 4).

4) Proposed Travel Way Closures

- D-D1, a 4.9 mile travel way presented on the BLM map (USDI 2000) begins at its junction with Pigeon Canyon Road (Route "G"; Gyp Hills Quad, T33N, R15W, Section 10; see photo KC-48-13), and completely fades out in Section 25 (T34N, R15W; Grand Gulch Bench Quad; see photo KC-48-23). The fielded staff could not locate its depicted northern terminus at BLM Route 1050. This "road to nowhere" contains numerous eroded sections (see photos KC-48- 14, 16, and 19) and should be closed to protect monument values.
- E-F (Grand Gulch Bench Quad; T34N, R14W, Sections 24,26, 27) is a little used (photo KC-31-1,2), eroding (photo KC-31-5) 1.8-mile travel way that is largely revegetated. This "road to nowhere" should be closed to mechanized travel to protect monument values.
- II-III (Whiskey Springs travel way; Gyp Hills Quad) is a 3.2-mile, little-used travel way that begins off travel way "J-I" in Section 32 (T34N, R15W; photo KC-49-5) and ends at the Whiskey Springs-Buckhorn Springs escarpment in Section 26 (T34N, R16W; photo KC-49-6). The continuation of the travel way descends in an apparently abandoned, eroding series of switchbacks entering Grand Wash (photos KC-C1-16,17). This little-used "road to nowhere" impacts critical tortoise habitat, desert vegetation and soils, and poses a serious erosional problem at the escarpment. It should be closed to mechanized use, stabilized with drainage ditches, stone or log checks and waterbars, and restored to a natural condition.
- AA-BB (Upper Grapevine Springs travel way; Gyp Hills Quad) is a 3.5-mile, little-used travel way that begins off travel way "J-I" in Section 21 (T34N, R15W; photo KC-49-10) and ends in a steep, eroding (photo KC-C1-5) section dead ending east of Grapevine Springs (T34N, R16W, Section 26; photo KC-C1-9). This little-used "road to nowhere" impacts critical tortoise habitat, desert vegetation and soils, and poses a significant erosional problem at the escarpment. It should be closed to mechanized use and restored to a natural condition.
- YY-ZZ (Upper Black Willow Springs travel way; Gyp Hills Quad) is a three-mile, little-used travel way that begins off travel way "J-I" in Section 21 (T34N, R15W;

photo KC-49-16). The travel way ends at the bottom of an eroding (photo KC-50-14) in a fragile bottomland near Black Willow Spring (T34N, R15W, Section 13; photo KC-50-13). This little-used "road to nowhere" impacts critical tortoise habitat, desert vegetation and soils, and poses a significant erosional problem at the escarpment and in the bottomlands. It should be closed to mechanized use and restored to a natural condition.

- J-I is a 10.5-mile travel way bisecting the proposed Pigeon Canyon Wilderness into roughly what was once the Little Arizona and Pigeon Canyon WSA's. J-K is a lightly used (see photos KC-49-11,19) travel way with numerous eroding sections (photos KC-49-8,15) and numerous bypass routes (photos KC-49-15,18). The route begins in near the junction of NRA Routes 150 and 153 (T34N, R15W, Section 32; Gyp Hills Quad) and continues to its junction with BLM Route 1050 (photo KC-44-21; Grand Gulch Bench Quad; T34N, R14W, Section 5). This travel way provides a short cut to BLM Route 1050, but serves no other purpose. It impacts a significant amount of critical tortoise habitat (USDI, BLM, 1998, Map 4). Closure to mechanical travel of J-K would also resolve the impact issues related to travel ways II-III, AA-BB, and YY-ZZ, including soil, vegetation, archeological resources, and other native wildlife. This travel way network should be allowed to return to a natural condition.
- GG-G1G1 (Lower Black Willow Springs) is a 2.4-mile travel way consisting of numerous short bypasses (KC-50-4,5) and vehicle-associated impacts, and several significant erosional problems (photos KC-50-6,12). The travel way provides access to Black Willow Springs, an important Mohave desert water source heavily impact by cattle and burro grazing (photos KC-50-8,9,10,11,13). It begins at the junction of Cottonwood and Black Wash (Gyp Hills Quad; T34N, R16W, Section 27; photo KC-50-1) and continues on a sandy substrate up to a desert bench and ending near the springs in Section 13. The field staff could not locate the continuation of the route depicted on the BLM map (USDI, BLM, 2000) to its junction with BLM Route 1050 (T34N, R15W, Section 5); nor the "jeep trail" presented in Sections 14 and 15 (T34N, R16W). Closure to mechanical travel of GG-G1G1 would provide protection and refuge to a wide variety of native desert wildlife dependant on Black Willow, Little Arizona, Grapevine, Buckhorn, and Whiskey Springs. Closure would further protect important monument values, including critical desert tortoise habitat, soil, vegetation, and archeological resources.

These proposed road closures would provide significant additional protection for desert tortoise and other native wildlife species, as well as native vegetation and soils. In addition, the closures would enhance the refuge qualities of the "Little Arizona" spring complex. Desert springs are likely biological "hot spots" providing "spatially rare habitats that support disproportionately high levels of species density and most of the regions rare and endemic species" (see Grand Canyon Wildlands Council, 1999, page 4; and Stevens and Burke, 2000, pages 24-32). Wilderness designation would afford additional significant protection for these important Monument resources.

¹ This quote is derived from a computer printout document fragment, no date apparent, labeled "Intensive Wilderness Inventory Narrative Summary." Copy on file at the Arizona Wilderness Coalition's Grand Canyon office.

² "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

³ Wilderness Act, Section 2(c).

⁴ The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

⁵ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁶ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

⁷ Defined in USDI 2001 [H-6310-1, Section .13(B)(3)(b)(1)(b)] as "standing out among others of its kind, conspicuous, prominent," or "superior to others of its kind; distinguished; excellent."

⁸ Defined in USDI 2001 [H-6310-1, Section .13(B)(3)(b)(1)(c)] as "a situation or condition favorable to the attainment of a goal."

⁹ Defined in USDI 2001 [H-6310-1, Section .13(B)(3)(b)(1)(a)] as "the state of being alone or remote from others; isolation," or as "a lonely or secluded place."

¹⁰ Defined in USDI 2001 [H-6310-1, Section .13(B)(3)(b)(2)] as "nonmotorized (sic), non-mechanical (except as provided for by law), and undeveloped types of recreation activities."

¹¹ I.e, a primitive and unconfined type or recreation.

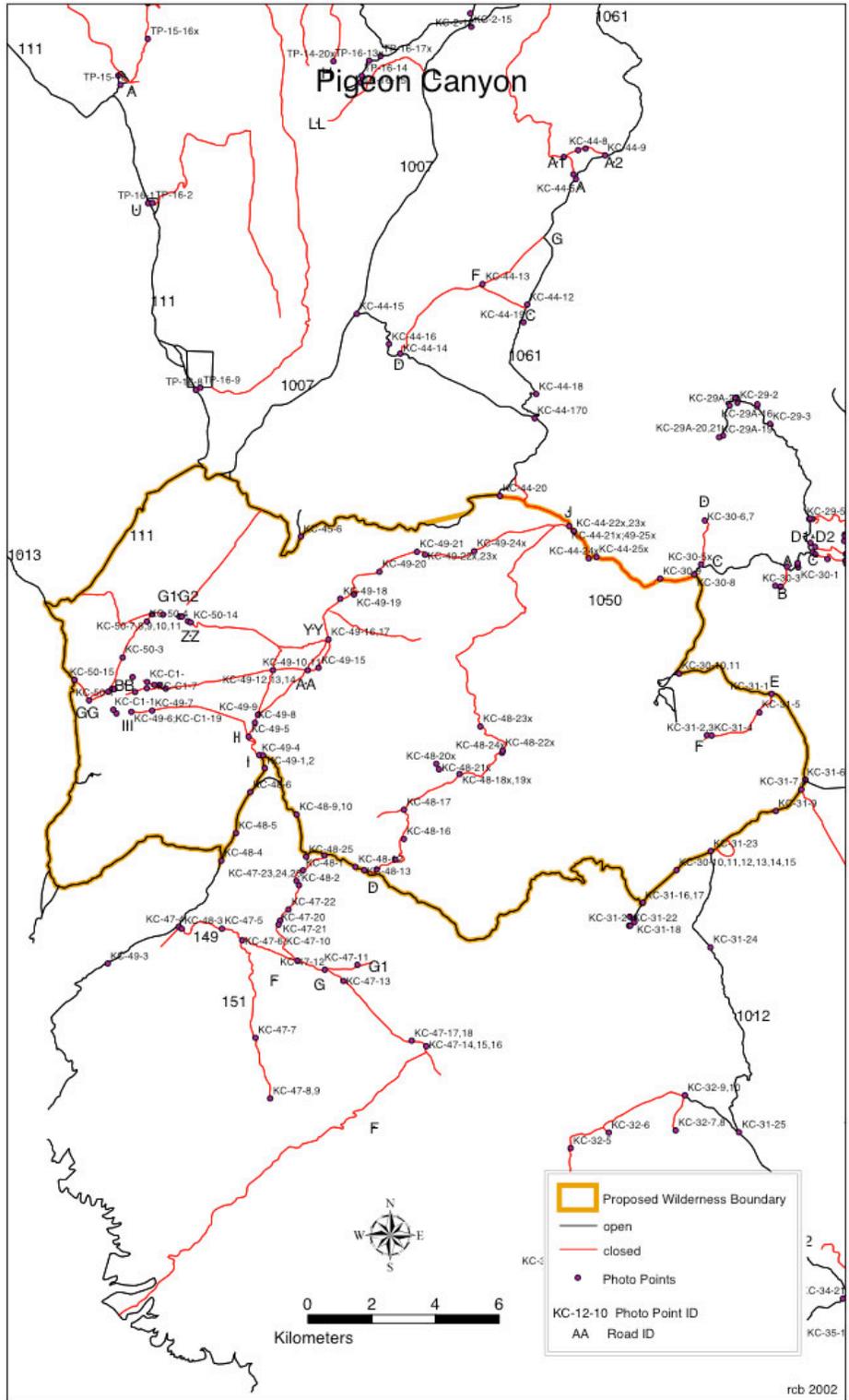


Photo Scan

PIGEON CANYON



1. KC-C1-5; Gyp Hills Quad; T34N, R16W, Section 25; view of travel way AA-BB at its junction to Grapevine Springs.



2. KC-C1-9; Gyp Hills Quad; T34N, R16W, Section 26; view of abandoned section of travel way to Grapevine Springs off of AA-BB.



3. KC-C1-16; Gyp Hills Quad; T34N, R16W, Section 26; severe erosion on travel way II-III (Whiskey Springs).



4. KC-C1-17; Gyp Hills Quad; T34N, R16W, Section; severe erosion on travel way II-III (Whiskey Springs).



5. KC-31-1; Grand Gulch Bench Quad; T34N, R14W, Section 24; view toward the south of travel way E-F at its junction with BLM Route 1002. The route is barely visible.



6. KC-31-2; Grand Gulch Bench Quad; T34N, R14W, Section 27; view toward the west of the end of travel way E-F. The route is substantially unnoticeable.

PIGEON CANYON (Cont.)



7. KC-31-5; KC-31-1; Grand Gulch Bench Quad; T34N, R14W, Section 26; view toward the northeast of an eroded section of travel way E-F.



8. KC-44-21; Grand Gulch Bench Quad, T34N, R14W, Section 5; view toward the west of the junction of travel way J-I at BLM Route 1050.



9. KC-48-13; Gyp Hills Quad; T33N, R15W, Section 10; view toward the east of the junction of travel way D-D1 and Pigeon Canyon Road.



10. KC-48-14; Gyp Hills Quad; T33N, R15W, Section 10; view toward the east of an eroded section of travel way D-D1.



12. (Above) KC-48-19; Gyp Hills Quad; T33N, R15W, Section 36; view of an eroded section of travel way D-D1.

11. (Left) KC-48-19; Gyp Hills Quad; T33N, R15W, Section 36; view of an eroded section of travel way D-D1.

PIGEON CANYON (Cont.)



13. KC-48-23; Grand Gulch Bench Quad; T34N, R15W, Section 25; view toward the west of travel way D-D1; the route appears abandoned.



14. KC-48-24; Grand Gulch Bench Quad; T34N, R15W, Section 36; view toward the southeast of the proposed Pigeon Canyon Wilderness.



15. KC-49-5; Gyp Hills Quad; T34N, R15W, Section 31; travel way II-III (east Whiskey Springs way).



16. KC-49-6; Gyp Hills Quad; T34N, R16W, Section 26; view toward the southwest of travel way II-III just above the escarpment leading down to Whiskey Springs.



17. KC-49-8; Gyp Hills Quad; T34N, R15W, Section 29; view toward the north of travel way J-I.



18. KC-49-10; Gyp Hills Quad; T34N, R15W, Section 21; view toward the west of travel way AA-BB (toward Grapevine Spring).

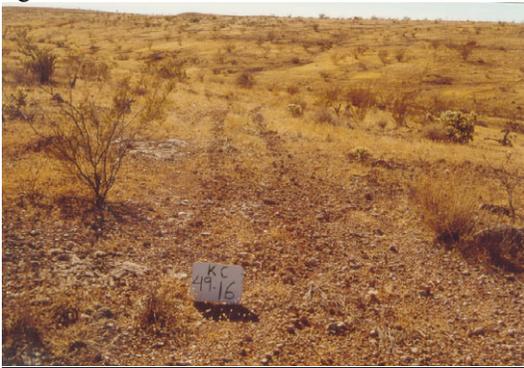
PIGEON CANYON (Cont.)



19. (Above) KC-49-11; Gyp Hills Quad; T34N, R15W, Section 21; view toward the east of travel way J-I at its junction with travel way AA-BB.



20. (Right) KC-49-15; view toward the northeast of travel way J-I. Note bypass on the right.



21. KC-49-16; Gyp Hills Quad; T34N, R15W, Section 21; view of travel way ZZ-YY (toward Black Willow Spring) at its junction with travel way J-I. Route is substantially unnoticeable and appears abandoned.



22. KC-49-18; Gyp Hills Quad; T34N, R15W, Section 16; view toward the northeast of travel way J-I. Note how the route splits at a steep, eroding section.



23. KC-49-19; Gyp Hills Quad; T34N, R15W, Section 16; view is toward the southeast of a spur route off of travel way J-I. This way is substantially unnoticeable.



24. KC-49-21; Gyp Hills Quad; T34N, R15W, Section 11; view toward the southeast of the proposed Pigeon Canyon Wilderness.

PIGEON CANYON (Cont.)



25. KC-49-22; Gyp Hills Quad; T34N, R15W, Section 11; view toward the southeast of the proposed Pigeon Canyon Wilderness.



26. KC-50-1; Gyp Hills Quad; T34N, R16W; Section 27 (BM 1747); view toward the northeast of the junction of travel way GG-G1G1 (Black Willow Springs) and Black Wash.



27. KC-50-4; Gyp Hills Quad; T34N, R16W; Section 14; view toward the southwest of multiple routes on travel way GG-G1G1.



28. KC-50-5; Gyp Hills Quad; T34N, R16W; Section 14; view toward the southwest of multiple routes off of travel way GG-G1G1.



29. KC-50-6; Gyp Hills Quad; T34N, R16W; Section 13; view toward the west of an eroding, narrow section of travel way GG-G1G1.



30. KC-50-8; Gyp Hills Quad; T34N, R16W; Section 13; view of cattle impacts at Black Willow Spring vicinity.

PIGEON CANYON (Cont.)



31. KC-50-9; Gyp Hills Quad; T34N, R16W; Section 13; view of cattle/burro impacts at Black Willow Spring vicinity.



32. KC-50-10; Gyp Hills Quad; T34N, R16W; Section 13; view of cattle/burro feces in Black Willow Spring discharge



33. KC-50-11; Gyp Hills Quad; T34N, R16W; Section 13; view of cattle/burro feces in Black Willow Spring discharge.



34. KC-50-12; Gyp Hills Quad; T34N, R16W; Section 13; view toward the northwest of the end of travel way GG-G1G1 at the Black Willow Springs vicinity.



35. KC-50-13; Gyp Hills Quad; T34N, R16W; Section 13; view of cattle impacts at Black Willow Spring vicinity.



36. KC-50-14; Gyp Hills Quad; T34N, R16W; Section 13; view of the end of abandoned travel way YY-ZZ at Black Willow Springs.

Grand Canyon- Parashant National Monument Wilderness Recommendation

Unit: Snap Canyon Proposed Wilderness (90,590 acres; Quads: Grand Gulch Bench, Gyp Hills, Snap Draw, Snap Canyon East, Snap Canyon West, Tincanebitts Point, Mt. Dellenbaugh).

Summary:

The Arizona Wilderness Coalition recommends the 90,590-acre Snap Canyon Proposed Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates the wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory reveals that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed "Snap Canyon Wilderness" consists of the Lake Mead National Recreation Area proposed wilderness Unit 31 (USDI, National Park Service, 2001; see USDI, National Park Service, 1993). The unit consists of a combination of the former Cockscomb, Unit 31, 16,480 acres; and the former Grand Wash Cliffs, Unit 32; 12,100 acres) and two former BLM WSA (Nevershine Mesa, 1-105A, 19,457 acres; and Snap Point, 105B, 9,500 acres) (USDI, BLM, 1980a). The AWC recommends the name "Snap Canyon," a prominent topographic feature, for this wilderness unit.

The former Nevershine WSA is composed of cliffs, canyons, slopes, and ledges of the Lower Grand Wash Cliffs. The unit includes Snap and Cunningham Canyons, and Nevershine Mesa. Its elevation ranges from 2,153 feet on the west to 5,129 feet atop the Grand Wash Fault on the east. The vegetation at lower elevations consists of creosote, bursage, cheatgrass, yucca, and cacti, while the top of cliffs is primarily blackbrush with scattered yucca and cacti (USDI, BLM, 1982, Briefing Paper). The former Snap Point WSA consists the spectacular Upper Grand Wash Cliffs, including Snap Point, portions of Grand Canyon's "Esplanade" (Sanup Plateau), and inspiring deep chasms including Pearce and tributaries of Snap Canyons. Vegetation consists of with a mixture of cacti, creosote, grasses and pinyon-juniper woodlands (USDI 1979, Decision Report). Lake Mead National Recreation Area includes the formidable Grand Wash Cliffs, Balanced Rock and Snap Canyons, "Gods Pocket and the rugged, colorful southern "Cockcomb."

Snap Point WSA and Nevershine WSA should be considered a single BLM component of a much larger NPS proposed wilderness. The division between Snap Point WSA and Nevershine WSA was based on an eroding travel way (Fort Garrett road; not to be confused with the BLM Ft. Garrett Point Road)) leading from it's junction with BLM Route 1012 (T32N, R14W, Section 2) to its junction with the Grand Canyon National Park boundary (USDI, BLM, EIS, 1982, Map 2-9). Considered in the context of the surrounding NPS proposed wilderness, this travel way is a cherry-stem, not a discreet boundary and should not artificially separate the wilderness units. A cherry-stem does not by itself disqualify an area from being considered "roadless" (USDI 2001 [H-6310-1, Section .13(A)(3), page 10]).

B. Historical Review and Critique of the 1982 WSA Decision Process

1) *Nevershine Mesa* (1-105A; 19,457 acres)

By 1982, the BLM convincingly endorsed Nevershine WSA's wilderness characteristics: the "unit clearly demonstrates its **outstanding** characteristics of **naturalness and opportunities for solitude and unconfined types of recreation**" (emphasis added; USDI, BLM, 1982, Briefing Paper).

Regarding solitude and primitive, unconfined recreation, the BLM stated:

*"[t]he WSA's varied and rough topography provides **outstanding opportunities for solitude** (emphasis added). The unit's major features—the Lower Grand Wash Cliffs, Snap and Cunningham Canyons, and Nevershine Mesa—as well as the foothills and drainages, provide excellent topographic screening (USDI, BLM, 1982, EIS:51)... The unit provides excellent opportunities for sightseeing and photography at features within the unit and outside (USDI, BLM, 1982, Briefing Paper; USDI, BLM, 1982, EIS:51). There are outstanding views of both the Lower and Upper Grand Wash cliffs, the Virgin Mountain, Lake Mead, Snap Point, and the Grand Canyon (USDI, BLM, 1982, EIS:51).*

The unit's supplemental values, as noted by the BLM, consisted of:

...geology, historical and cultural sites, wildlife [including desert tortoise, bighorn sheep, and...golden eagles] and scenery...[including] the Lower Grand Wash Cliffs which marks the transition zone for two major physiographic provinces: the Colorado Plateau and the Basin and Range. The northern boundary is a historical route for hauling copper ore in the early 1900s and there are recorded Anasazi Indian sites (USDI, BLM, 1982, Briefing Paper).

Nevershine WSA, according to the BLM, had

...no human imprints except for an old water tank....All other impacts, including the Savanic and Cunningham Mines, were eliminated from this unit during the intensive inventory and protest period (USDI, BLM, 1982, EIS:51; USDI, BLM, 1982, Briefing Paper).

The BLM described Nevershine WSA as suitable for wilderness designation "on the basis of its high-quality wilderness values...exemplified by the ruggedness, remoteness, and beauty of the Lower Grand Wash cliffs, Snap Canyon, Cunningham Canyon, and Nevershine Mesa." In addition, the BLM noted that the "WSA lacks human imprints, and **wilderness designation would ensure protection of bighorn sheep habitat, an important supplemental value**" (emphasis added; USDI, BLM, 1982, EIS:19).

In spite of Nevershine WSA's obvious wilderness character, the unit was found suitable and recommended for wilderness in Step I but not Step II of the Management

Framework (MFP) process (USDI, BLM, 1982, Briefing Paper). The BLM noted that Nevershine contained "no human imprints except for an old water tank....All other impacts, including the Savanic and Cunningham Mines, were eliminated from this unit during the intensive inventory and protest period" (USDI, BLM, 1982, EIS:51; USDI, BLM, 1982, Briefing Paper). The BLM noted that the unit contained "[n]o improvements or private and state inholdings...[but included] 87 existing mining claims(USDI, BLM, 1982, Briefing Paper)."

The Shivwits MFP recommended the entire unit as nonsuitable for wilderness designation "because of known energy mineralization in the unit, including breccia type deposits...[and] 87 mining claims (USDI, BLM, 1982, EIS:19)." The mining claims have been dropped (Becky Hammond; personal communication). In addition, the BLM noted:

"The National Park Service has recommended designating as wilderness an area adjoining this WSA with similar landforms and vegetation. Therefore, designation of this WSA would neither add to the diversity of the National Wilderness Preservation System nor improve upon the distribution of wilderness areas within the system" (USDI, BLM, 1982, EIS:19).

Current BLM policy stresses that each inventory unit must be assessed on its own merits or in combination with an adjacent wilderness area or wilderness study area (USDI 2001 [H-6310-1, Section .13(B)(3)(b), page 13]) including other federal agencies such as the NPS (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]). Proximity and similarity to other wilderness areas does not detract from the unit's wilderness character. Current BLM policy prohibits comparisons, numerical, alphabetical, or qualitative rating systems. Even under the earlier criteria, the unit should have been recommended for wilderness designation and not dropped.

Since the entire proposed Snap Canyon wilderness is contiguous with the 1.1 million-acre Grand Canyon National Park proposed wilderness (USDI, NPS, 1998), conservationists encourages agency evaluation of wilderness characteristics of the Grand Canyon-Parashant "Snap Canyon" Proposed Wilderness within this broader context. This approach is advocated to emphasize the entire wilderness's ecological and experiential value.

Snap Point (1-105B; 9,500 acres)

The BLM emphasized that the former Snap Point WSA "***provides outstanding opportunities*** for hiking, sightseeing, and photography, including scenic vistas of the Grand Canyon, Lake Mead, and the Grand Wash Cliffs" (emphasis added; USDI, BLM, 1982, EIS:51).

The BLM described thick pinyon-juniper stands atop Snap Point as offering **outstanding opportunities for solitude** (USDI, BLM, 1982, EIS:51). The agency noted that "sideslopes and the area below Snap Point offer some screening in drainages but none comparable to the solitude on top." Current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both

"somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). Again, current policy (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) prohibits comparisons and qualitative rating systems.

In 1982, the BLM stated that the unit's only human imprints consists of five miles of trails and two reservoirs. These impacts are spread along the border of the unit and largely unnoticeable (USDI, BLM, 1982, EIS:51).

In spite of Snap Point WSA's "outstanding opportunities for solitude" and "outstanding opportunities for hiking, sightseeing, and photography," and absence of noticeable human impacts, the 1982 EIS recommended Snap Point as nonsuitable for wilderness designation (USDI, BLM, 1982, EIS:19). "The unit lacks high-quality wilderness characteristics (see USDI 2001 [H-6310-1, Section .13(B)(1), page 11; Again, current policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems), and its outstanding opportunities for solitude is based on thick stands of pinyon and juniper on top of Snap Point" (USDI, BLM, 1982, EIS:19). The agency noted that "sideslopes and the area below Snap Point offer some screening in drainages but none comparable to the solitude on top." Current policy states the agency should

[a]void using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)])... Do not assume that simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]).

Current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). In any event, we submit that the vast Sanup Plateau, the narrow canyons of Pearce and tributaries of Snap Canyon, the rugged Upper and principal Grand Wash Cliffs offers outstanding opportunities for solitude and a primitive and unconfined type of recreation.

C. AWC Recommendation

Snap Canyon Proposed wilderness meets the BLM and NPS mandatory wilderness criteria for size, naturalness and outstanding opportunities for a primitive or unconfined type of recreation. The area also possesses numerous outstanding "optional" wilderness characteristics. Based on the analysis presented below, the Arizona Wilderness Coalition recommends the 90,590-acre Snap Canyon for WSA designation.

1) Proposed Boundary

The unit's northern boundary consists of "Lower Pigeon Canyon Road" (unnumbered) beginning at its junction with BLM Route 1012 (Grand Gulch Bench Quad, (Grand Gulch Bench Quad; T33N, R14W, Section 2); and continuing in a westerly direction to the Lake Mead National Recreation (Lake Mead NRA) Boundary, becoming Lake Mead NRA Route 153 (Gyp Hill Quad; T33N, R15W; Section 9); to its junction

with Lake Mead NRA Route 152B (T34N, R15W, Section 32); then in a southerly direction to its junction with Lake Mead NRA Route 152 (T33N, R15W, Section 7); and continuing south to its junction with Lake Mead NRA Route 148 at Tassi Springs (Section 13); continuing south until its junction with the 1229-foot contour (this is the maximum level of Lake Mead reservoir described in the 1986 Lake Mead General Management Plan, Vol. 1, page iii.) at Lake Mead reservoir at Grand Wash Bay; continuing in a southerly and easterly direction along the eastern and northern NRA 1229-foot contour until its junction with Grand Canyon National Park (Snap Canyon West Quad; T32N, R15W, Section 30); continuing in an easterly direction along the NRA-Park boundary to its intersection with the "Twin Creek" spur off of the Twin Point Road (extension of BLM Route 1019; Mt. Dellenbaugh Quad; T31N, R12W, Section 18); then along the spur in a northerly direction to its junction with Twin Point Road (extension of BLM Route 1019) and continuing along 1019 to its junction with travel way A-B at point "B" (Castle Peak Quad; T32N, R12W; Section 32); then along A-B in a westerly then northerly direction to its junction with BLM Route 1012 in Section 29 (point "A"); then in a westerly direction along 1012 to point "CC" (Snap Draw Quad; T32N, R13W, Section 27); then along travel way A1-C (depicted on the Snap Draw Quad as running parallel to the section 27-34 boundary) in a westerly direction to its junction with 1012 (point "A1") in Section 28; then continuing along 1012 in a northwesterly direction until its junction with the "Lower Pigeon Road" (Grand Gulch Bench Quad; T33N, R14W, Section 2).

2) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed 90,590-acre Snap Canyon wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.² The NPS component is already a "proposed wilderness" (USDI, NPS, 2001).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs the agency to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retain its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Snap Canyon Wilderness, the answer to both questions is yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). In addition, the BLM noted "the "WSA lacks human imprints" (USDI, BLM, 1982, EIS:19) and lauded the area's "outstanding characteristics of naturalness (USDI, BLM, 1982, Briefing Paper). Recent citizen's inventories affirm this earlier agency stance.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Snap Canyon's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]) and are in fact "substantially unnoticeable." AWC maintains that it is reasonable to assume past impacts created by the travel ways described above "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

The principal proposed "road" closures lie within Lake Mead National Recreation Area (Routes 149 and 151) and are necessary to protect wildlife (including desert tortoise), native vegetation, soils and microbial crust. This action is consistent with NPS policy (USID, NPS, 1999, RM-41, Sec. 6.2.1) as well as the Presidential Proclamation. In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.³ For another example, Congress designated the Grand Wash Cliffs WSA (also recommended by the BLM as nonsuitable for wilderness designation; USDI, BLM, 1982, EIS:20) as wilderness in 1984 and included the eight-mile "road" separating the former Grand Wash Cliffs WSA from Last Chance WSA. That road is now a hiking trail.

Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)⁴, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁵, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Snap Canyon Wilderness size, terrain variation ranging from the Gyp Hills' softly undulating badlands to rugged canyons and cliff lines, to dense pinyon-juniper forest, contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. The agency's own conclusion of the area's outstanding

opportunities for solitude (USDI, BLM, 1982, Briefing Paper; 1982, EIS:51) and an unconfined type of recreation (USDI, BLM, 1982, Briefing Paper; 1982, EIS:51) were reaffirmed by the recent citizen's wilderness inventory.

3) *Optional Wilderness Characteristics*

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The BLM identified important wilderness values and stated "wilderness designation would ensure protection of bighorn sheep habitat, an important supplemental value" (emphasis added; USDI, BLM, 1982, EIS:19). In addition, the objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Snap Canyons "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- colorful, lava-capped Precambrian and Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils including invertebrate fossils.
- portions of geologic faults, including...the Grand Wash fault.

c) Important watersheds for the Colorado River and the Grand Canyon....

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including large concentrations of ancestral Puebloan villages, numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument", including...ranch structures and corrals... scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders; and several old mining sites dating from the 1870s, showing the history of mining during the late 19th and early 20th centuries.

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors linking the plateau to the Colorado River corridor below, allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions throughout the monument
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl, the California condor, the desert tortoise (most of the western wilderness lies within the Pakoon ACEC, an area proposed for management for desert tortoise recovery; see USDI, BLM, 1998, page 5 and Map 4).

4) Travel Way Closures

The proposed closures would further protect the objects identified in the Grand Canyon-Parashant Proclamation including a

remote area [consisting of] open, undeveloped spaces, engaging scenery...natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

Closure would provide significant protection of

features indicating a long and rich human history spanning more than 11,000 years including archeological sites preserved in good condition due to their remoteness and the lack of easy road access, numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites...irreplaceable rock art images, quarries, watchtowers, agricultural features, burial sites, caves, rockshelters, trails, and camps.

Travel way closures would further protect the

outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors" including the "intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature," a "diverse wildlife... [and] threatened or endangered species include[ing]...the desert tortoise.

- NRA 149 (4.3 miles), begins in Section 13 (Gyp Hills Quad, T33N, R16W; Photo KC-47-4) and ends in Section 22 (BLM lands, Snap Canyon West Quad, T33N, R15W; Photo KC-47-11). The travel way generally follows Tassi Wash directly to a rusted out tank and trough (see photo KC-47-11). Erosional problems occur outside the wash (photos KC-47-5,10). This travel way provides access to routes F-M and

NRA Route 151, each of which presents serious erosional and ORV impacts as describe below. NPS policy (USDI, NPS, 1999a, Section 6.2.1) states that

[l]ands that have been logged, farmed, grazed, mined, or otherwise utilized in ways not involving extensive development or alteration of the landscape may also be considered suitable for wilderness designation if... their wilderness character could be maintained or restored through appropriate management actions.

Since a significant portion of NRA Route 149 lies within an active wash, restoration of the segment's wilderness character would require only one good rainstorm. We suggest closure of the travel way beginning at "The Box" narrows at Tassi Spring, with provisions for the grazing permittee to maintain the tank on BLM lands in Section 22.

- NRA Route 151 (3.5 miles), begins at its junction with NRA Route 149 in Section 19 (Gyp Hills Quad; T33N, R15W; photo KC47-6) and ends just south of Section 32. The travel way provides access to a ATV camp in Snap Canyon wash. Signs of off-route ATV travel through a posted closed area in Section 29 (see photo KC-47-7 in ATV impact section) indicate illegal ATV use. Localized damage to microbiotic soil crusts is significant.
- A-G (2.6 miles) begins in Section 21 (Snap Canyon West Quad, T33N, R15W; photo KC-47-12) and disappears in Section 26 (photo KC-47-15). This route to nowhere has several significantly eroded sections (see photos KC-47-13,16). A-G should be closed and restored to a natural condition.
- F-M (1.9 miles), begins in Section 21 (Snap Canyon West Quad; T33N, R15W; Photo KC-47-19) and ends in Section 8 (Gyp Hills Quad; T33N, R15W; Photo KC-47-23). The route is generally an ATV trail ending in a washout approximately 0.4 miles south of NRA Route 153. Although this travel way is depicted on the BLM Map (USDI, BLM, 2000) and the NRA proposed Wilderness Map (USDI, NPS, 2001), it is neither signed as open nor does it actually connect with 153 as depicted. Rather, it ends in an extensive ORV "play area" in sections 8 and 9 (see photos KC-47-24,25). It should be closed and restored to a natural condition.
- Tincanebitts Tank Road (Snap Draw Quad, T32N, R13W, Sections 28 and 32); The route is severely eroded (photos KC-34-14,16,17) and should be stabilized and restored to a natural condition. Access essential maintenance of the tank can be accommodated through the minimum requirement process.
- A1-C; an eroding (photos KC-34-6,,13), little used (photo KC-34-7 road to nowhere, this travel way dead ends at the NRA boundary at the bottom of Section 34 (Tincanebitts Point Quad; T32N, R13W). The southern portion of the travel way is not depicted on the quad nor the BLM map (USDI 2000). The northern east-west trending section is redundant with BLM Route 1012. It should be closed and stabilized with waterbars and primitive drainage berms, and restored to a natural condition.
- A2-A3; a road to nowhere ending at the NRA boundary (Tincanebitts Point Quad; T32N, R13W, Section 34; photo KC-34-1). It should be closed to mechanized travel and restored to a natural condition to protect Monument values.

- A-B; a little used (photos KC-33-22,23) "road to nowhere" ending in Section 33 (Castle Peak Quad, T32N, R12W). It should be closed to mechanized travel and restored to a natural condition to protect Monument values.

5) *Cherry Stems*

- B-C (Snap Canyon East Quad) begins at its junction with BLM Route 1012 (T32N, R14W, Section 2) to its junction with the Grand Canyon National Park boundary (USDI, BLM, EIS, 1982, Map 2-9). The so-called NPS "Ft. Garrett" road in Grand Canyon National Park is closed to vehicular access (USDI, NPS, 1998, page 78). The AWC recommends shortening the BLM portion of this cherry stem to end at the tank just west of knoll 4632 (T33W, R14W, Section 34) with restricted access determined by an explicit minimum requirement analysis for essential maintenance of the trick tank east of knoll 4858 in Section 8. The heavily eroded travel way south of this location should be stabilized with drainage features (e.g., waterbars and checks) and restored to a natural condition or converted to a non-mechanized trail consistent with the NPS recommendation (USDI, NPS, 1998, page 78).
- Cunningham Mine (Grand Gulch Bench Quad, T33N, R14W, Section 16) is excluded from our proposal. The "jeep trails" depicted on the quad in sections 8, 16 and 17 disappear a short distance past its junction with the Cunningham mine (see photo KC-31-19) and the area is included in the proposed Snap Canyon Wilderness.
- Ft. Garrett Point road, beginning at its junction with BLM Route 1012 (T32N, R13W; Section 19), this eroded (photo KC-34-21) provides access to spectacular views of the Grand Canyon (KC-34-22,24). It is largely revegetated beyond the overlooks in Section 26 (photo KC-34-25) and should be closed beyond these vista areas to protect Monument values.

¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

² Wilderness Act, Section 2(c).

³ The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

⁴ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

⁵ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

SNAP CANYON



1. KC-33-22; Snap Draw Quad, T32N, R13W, Section 33; view of the terminus of travel way A-B at point "B."



2. KC-33-23; Snap Draw Quad, T32N, R13W, Section 33; view toward the northeast of the largely revegetated travel way A-B.



3. KC-34-1; Tincanebitts Point Quad; T32N, R13W, Section 34; view is toward the north of the travel way A2-A3 at its terminus at the NRA boundary.



4. KC-34-6; Snap Draw Quad, T32N, R13W, Section 34; view is toward the northeast of an eroding section of travel way A1-C.

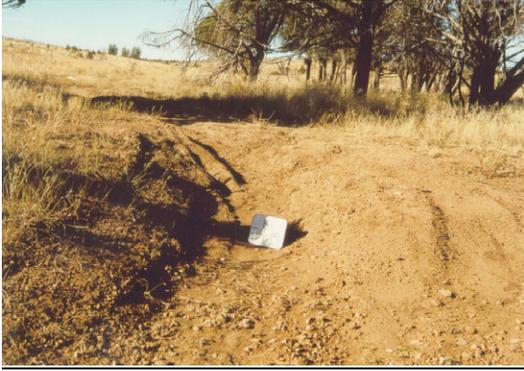


5. KC-34-7; Snap Draw Quad, T32N, R13W, Section 35; view is toward the northwest of a generally revegetated section of travel way A1-C.



6. KC-34-13; Snap Draw Quad, T32N, R13W, Section 35; view is toward the northwest of an eroding section of travel way A1-C.

SNAP CANYON (Cont.)



7. KC-34-14; Snap Draw Quad, T32N, R13W, Section 28; view is toward the southwest of Tincanebitts Tank Road and its junction with BLM Route 1012. The route is severely eroded.



8. KC-34-16; Snap Draw Quad, T32N, R13W, Section 32; view is toward the north of Tincanebitts Tank Road. The route is severely eroded.



9. KC-34-17; Snap Draw Quad, T32N, R13W, Section 32; view is toward the north of Tincanebitts Tank Road. The route is severely eroded.



10. KC-34-21; Snap Draw Quad, T33N, R14W, Section 19; view of the severely eroded junction of the Ft. Garrett Point overlook road and BLM Route 1012.



11. KC-34-22; Snap Canyon East Quad, T32N, R14W, Section 26; scenic view of Grand Canyon National Park from the overlook at the end of Ft. Garrett Point Road.



12. KC-34-24; Snap Canyon East Quad, T32N, R14W, Section 26; scenic view of the Grand Wash Cliffs from the overlook at the end of Ft. Garrett Point Road.

SNAP CANYON (Cont.)



13. KC-34-25; Snap Canyon East Quad, T32N, R14W, Section 23; view of the travel way beyond the scenic overlooks. It is too narrow to accommodate a four-wheel drive vehicle without damage to the vegetation.



14. KC-47-4; Gyp Hills Quad, T33N, R15W, Section 13; view toward the southeast of the junction of NRA 149 (Tassi Wash Road) with NRA 148. The junction lies within an active wash.



15. KC-47-5; Gyp Hills Quad, T33N, R15W, Section 18; NRA Route 149 in active wash.



16. KC-47-6; Gyp Hills Quad, T33N, R15W, Section 19; view toward the south of the junction of NRA Route 149 and NRA Route 151 in an active wash.



17. KC-47-11; Snap Canyon West Quad (UTM 0240400, 4015193); view toward the southeast of a rusted out stock tank and trough, the terminus of G-G1 at G1.



18. C-47-12; Snap Canyon West Quad (UTM 0238920, 4015026); junction of G-G1 and the continuation of NRA Route 149 (travel way G-A at "A") on BLM lands. The route is largely revegetated and appears little used

SNAP CANYON (Cont.)



19. KC-47-13; Snap Canyon West (UTM 0239443, 4014687); an eroding section of travel way G-A (continuation of NRA Route 149).



20. KC-47-14; Snap Canyon East, T33N, R15W, Section 35; view toward the southwest of the terminus of travel way G-A (NRA Route 149). Only ATV tracks continue and the route is not mechanically constructed or maintained.



21. KC-47-16; Snap Canyon East, T33N, R15W, Section 26; an eroded section of travel way G-A (continuation of NRA Route 149).



22. KC-47-18; Snap Canyon East, T33N, R15W, Section 35; view of Snap Canyon.



23. KC-47-19; Snap Canyon West Quad (UTM 0238007, 4015312); travel way F-M at F. The route is generally revegetated and substantially unnoticeable.



24. KC-47-23; Snap Canyon East, T33N, R15W, Section 8; view toward the northeast of travel way F-M ending in a washout.

SNAP CANYON (Cont.)



25. KC-47-24; Snap Canyon East, T33N, R15W, Section 8; view toward the southeast of ATV tracks through microbial crusts off of travel way F-M.



26. KC-47-25; Snap Canyon East, T33N, R15W, Section; view of ATV tracks off of travel way F-M.



27. KC-48-2; Gyp Hills Quad, T34N, R15W, Section 32; view toward the west of Azure Ridge from Snap Canyon Wilderness.



28. KC-49-1; Gyp Hills Quad, T34N, R15W, Section 32; view toward the southeast of Snap Point dusted with snow.



29. KC-49-3; Snap Canyon West Quad; view toward the southeast of the Cockscomb in Lake Mead NRA.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Tank Canyon Wilderness (9,659 acres; Quads: Olaf Knolls, Pakoon Springs, Gyp Hills, and Grand Gulch Bench).

Summary:

The Arizona Wilderness Coalition recommends the 9,659-acre proposed Tank Canyon Wilderness for Wilderness designation. A review of the 1979 "Overthrust Belt accelerated intensive inventory" process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

Tank Canyon consists of gently undulating plains cut by washes. Vegetation consists of Joshua trees, creosote and grasses. The entire unit consists of significant¹ desert tortoise habitat (USDI, BLM, 1998, Map 4).

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified Tank Canyon (southern Olaf Knolls Unit 1-113) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931])). The Overthrust Belt, a geologic formation, was thought to contain significant oil and gas reserves (USDI, BLM, 1980 Proposal Report, page 3). The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result, and apparently without further public documentation of the unit's wilderness character, the BLM dropped the entire Olaf Knolls inventory unit (including Tank Canyon) from further wilderness evaluation (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results").

The predictions of the Overthrust Belt's energy potential dissolved without any development of economically recoverable oil or gas deposits on the Arizona Strip. Since new information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)²

a) Size

The proposed 9,659 -acre Tank Canyon Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Tank Canyon Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos HH-1,3). It's expansive grasslands, intricate drainages, and size creates a picturesque, rugged wilderness home to desert tortoise, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Tank Canyon's only cherry stem accesses a well and corral off of BLM Route 1050 in the lower reaches of Tank Canyon Wash (Gyp Hills Quad; T34N, R15W, Section 5).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Tank Canyon Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. While much of the area consists of gently rolling grasslands, current BLM policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). The evaluator should not assume that "simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Policy instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Finally, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM to reconsider Tank Canyon's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Tank Canyon's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- fossils, including invertebrate fossils.
- portions of geologic faults

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including...numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites... quarries, agricultural features, burial sites, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife
- Numerous threatened or endangered species including the desert tortoise (the proposed wilderness lies within desert tortoise habitat; see USDI, BLM, 1998, Map 4).

3) Proposed Boundary

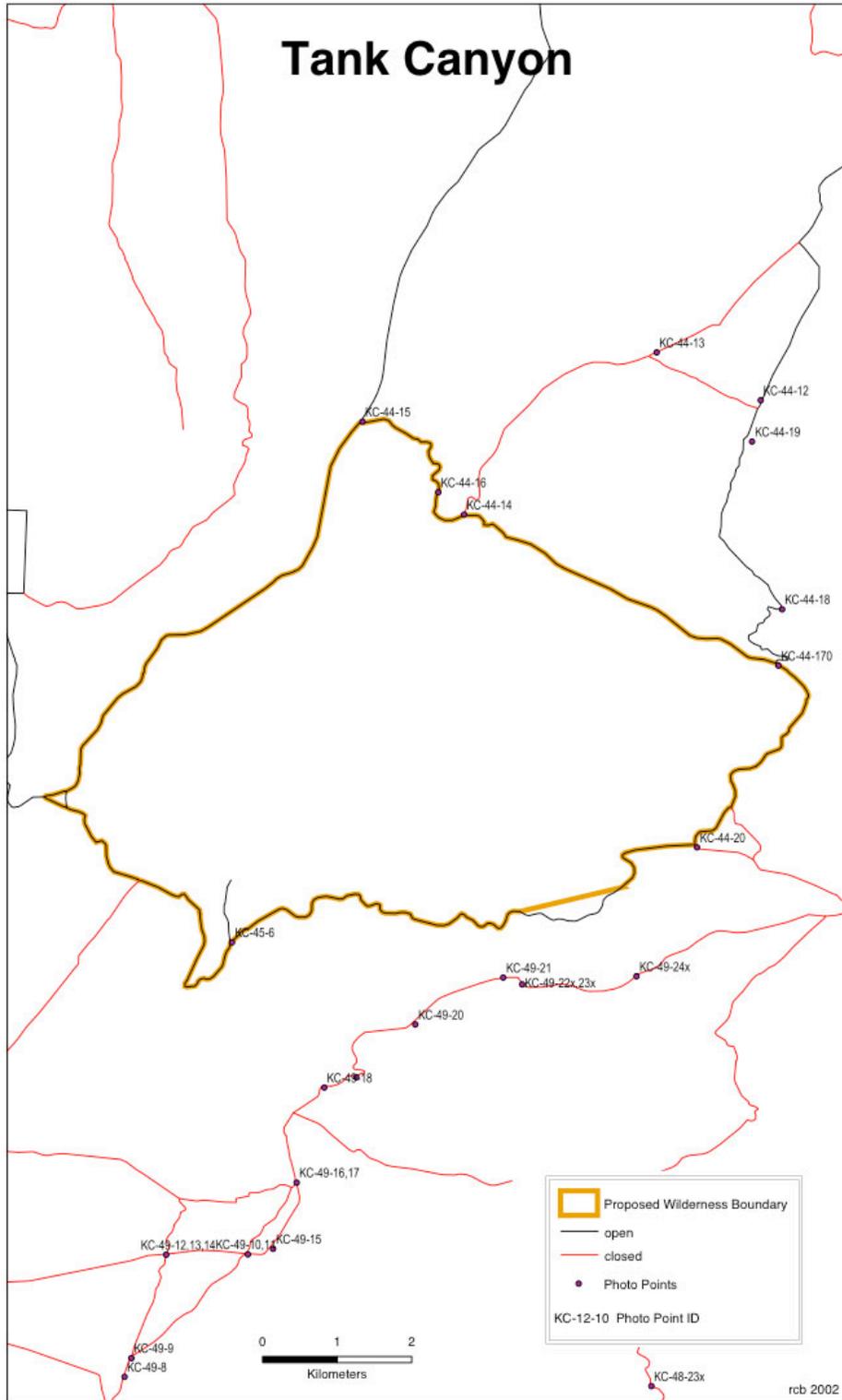
Beginning in the northwest corner at the junction of BLM Route 1007 with road segment AA-D-E (Pakoon Springs Quad; T35N, R15W, Section 16); along AA-D-E in an easterly direction to its junction with BLM Route 1061 at "E" (Olaf Knolls Quad; T35N, R14W, Section 30); then along 1061 in a southerly direction to its junction with BLM Route 1050 (Olaf Knolls; T34N, R15W, Section 1); then along 1050 in a westerly direction to its junction with BLM Route 1007 (Pakoon Springs Quad; T35N, R15W, Section 31); then along 1007 to its junction with road segment AA-D-E (Pakoon Springs Quad; T35N, R15W, Section 16).

4) *Cherry Stems*

Tank Canyon's only cherry stem road is a 0.5-mile route to a well and corral structure located in lower Tank Canyon wash (Gyp Hills Quad; T34N, R15W, Section 5).

¹ The BLM classifies the land as Category III habitat (USDI, BLM, 1998, Map 4. The agency considers Category III possesses "lower value in sustaining viable populations of tortoises" (USDI, BLM, 1988, page iii). Restoration of degraded habitat can be accomplished through non-mechanical techniques of re-seeding native grasses (personal communication, Tim Duck, wildlife specialist for the Arizona Strip BLM).

² "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.



Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Tom and Cull Wilderness (6,723 acres; Quads: Jacobs Well and Red Pockets).

Summary:

The Arizona Wilderness Coalition recommends the 6,723-acre proposed Tom and Cull Wilderness for Wilderness designation. A review of the 1979 "Overthrust Belt accelerated intensive inventory" process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Tom and Cull Wilderness consists of the former Jacobs Intensive Inventory Unit (1-122; 5,706 acres). This scenic region consists of narrow plateaus of pinyon and juniper forest and other native desert vegetation. The area provides important wildlife values, including deer, mountain lion, raptors and other desert species.

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified Tom and Cull (Jacobs) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931])). The Overthrust Belt, a geologic formation, was thought to contain significant oil and gas reserves (USDI, BLM, 1980 Proposal Report, page 3). The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result, and apparently without further public documentation of the unit's wilderness character, the BLM dropped the entire Tom and Cull (Jacobs) unit from further wilderness evaluation (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results").

The predictions of the Overthrust Belt's energy potential dissolved without any economically recoverable oil or gas deposits developed on the Arizona Strip. Since new information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. AWC Recommendation

1) Proposed Boundary

Beginning in the unit's southwest corner at the junction of State Route 101 with BLM Route 1041 (Red Pockets Quad; T37N, R16W, Section 13); continue in a northerly direction along 1041 to its junction with route "R" in Section 10 (Jacobs Well; T38N, R15W) approximately 0.4 miles south of 1041's junction with BLM Route 1004; then along route "R" in an easterly direction to its junction with 1004; then along 1004 in a southerly direction to its junction with State Route 101 in Section 28 near Jacobs Well;

then along 101 in a southerly then westerly direction to its junction with BLM Route 1041 (Red Pockets Quad; T37N, R16W, Section 13).

2) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed 6,723-acre Tom and Cull Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Tom and Cull Wilderness, the answer to both questions is a resounding yes (photo). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). It's intricate drainages, cliffs and plateau and size creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Tom and Cull's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). The "jeep trails" depicted as entering Tom and Cull Wash on the Red Pockets Quad (T37N, R15W, Section 7) but not on the BLM map (USDI 2000), ended immediately beyond the cherry-stemmed access ("K") to the tank (photo KC-50-18). The "Pack Trail" depicted on BLM map (USDI 2000) and the Jacobs Well Quad (T38N, R15W, Sections 28 and 33) should remain closed to mechanized travel.

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Tom and Cull Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

3) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Tom and Culls "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- fossils, including invertebrate fossils.
- portions of geologic faults

d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including...numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes

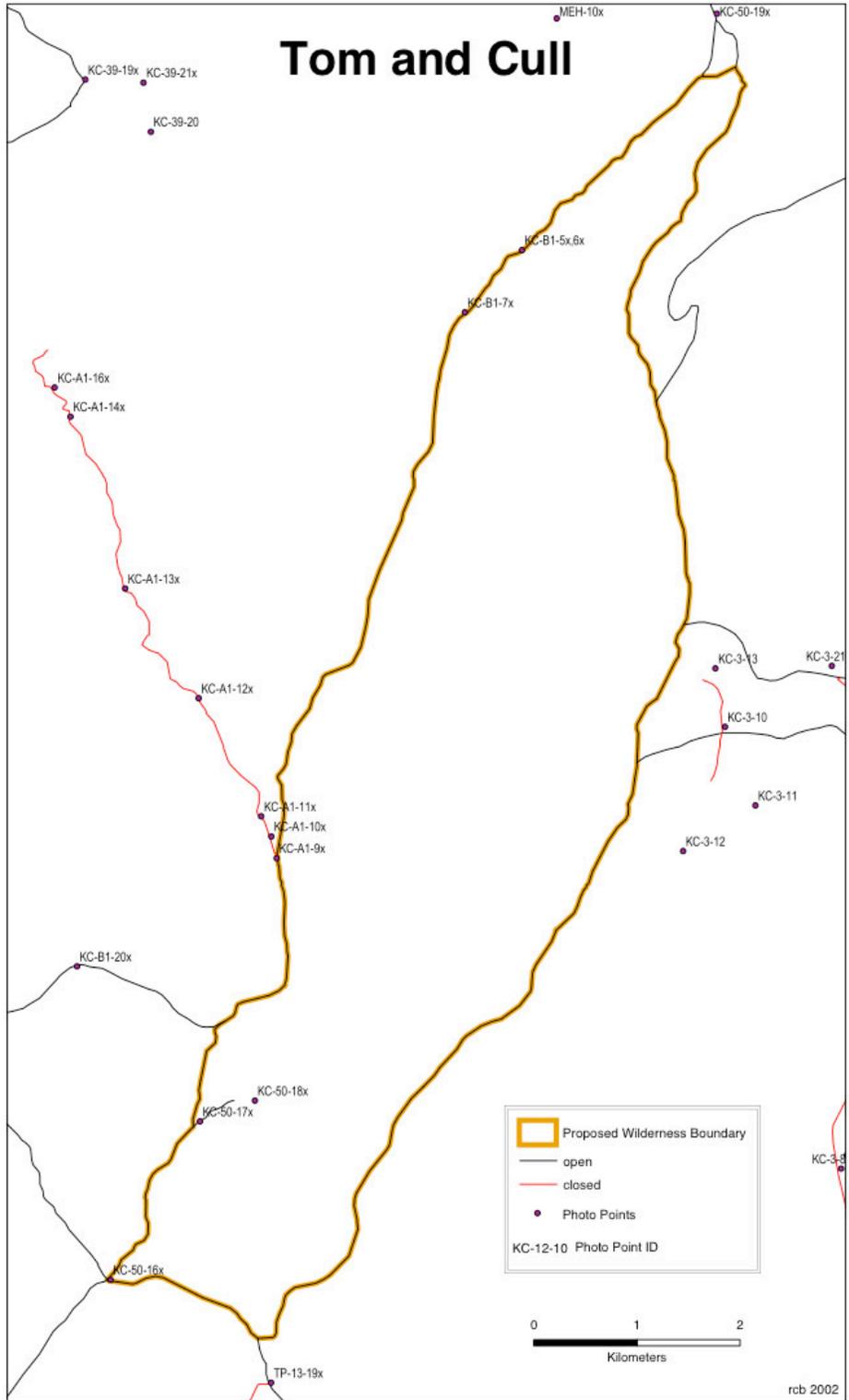
e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife

4) Cherry Stem

Route "K"; a 0.5 miles access to a tank and corral just off of BLM Route 1041 in Section 7 (Red Pockets Quad; T37N, R15W).

¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.



TOM & CULL



1. KC-50-18; Red Pockets Quad, T37N, R15W, Section 7; view is toward the east of the end of Cherry Stem "K." The route becomes substantially unnoticeable beyond this point.

Grand Canyon- Parashant National Monument Wilderness Recommendation Unit: Toroweap (6,015 acres)

Summary The Arizona Wilderness Coalition recommends the Proposed 6,015-acre Toroweap Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that the agency's wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory supports the conclusion that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The Proposed Toroweap Wilderness is a scenic arena of cinder cones, lava flows, and Great Basin desert scrub and grasses, and volcanic features of the Uinkaret Mountains. The area is contiguous to the 1.2 million-acre Grand Canyon National Park.

B. Historical Review and Critique of the 1982 WSA Decision Process

In its 1982 wilderness review, the BLM recommended Toroweap WSA as nonsuitable for wilderness designation:

Only the western half offers seclusion. A few wooded hills and drainages provide vegetation and topographic screening for solitude. The eastern half offers less opportunity for solitude than the western half. The eastern half lacks a diversity of landforms and vegetation and has little potential for quality primitive recreation (USDI, BLM, 1982, EIS:17).... Toroweap WSA provides no outstanding opportunities for solitude. Cinder cones, washes, and woodlands in the unit's western part provide limited screening, but this portion involves less than four square miles (USDI, BLM, 1982, EIS:48).

Current policy states either solitude or outstanding opportunities are present "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]), and that the area need not provide outstanding opportunities for both solitude and wilderness recreation, it "has only to possess one or the other"(USDI 2001 [H-6310-1, Section .22(A)(1)(b), page 21].

The 1982 assessment, the BLM also stated

Because of its small size (5,312) and narrow configuration, this unit's area of wilderness character would be difficult to make manageable (USDI, BLM, 1982, EIS:17). Narrow unit configuration constricts backcountry use and limits opportunities for long hikes and backpack trips (USDI, BLM, 1982, EIS:48

Current policy cautions the agency staff against concluding

that simply because an area is relatively small, it does not have an outstanding opportunity for solitude. Consideration must be given to the interrelationship

between size, screening, configuration, and other factors that influence solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]).

In any event, the current policy requires the agency to evaluate wilderness character "in combination with an adjacent wilderness area or WSA," in this case the 1.2 million-acre Grand Canyon Proposed Wilderness.

In its early review, the BLM also stated that "the eastern portion of the unit slopes gently and lacks any form of vegetation or topographic screening" (USDI, BLM, 1982, EIS:48). Current policy states:

Avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)])... Do not assume that simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude (USDI 2001 [H-6310-1, Section 13(B)(3)(c)(1)(b), page 14]).

The BLM's 1982 review stated:

This unit offers many types of primitive and unconfined recreation, including hiking, backpacking, hunting, and sightseeing. These opportunities, though, are not outstanding or better than others of their kind (USDI, BLM, 1982, EIS:48). The unit provides opportunities for hunting, photography, and short sightseeing trips, but these are not regionally unique or better than others of their kind (USDI, BLM, 1982, EIS:17).

Current policy states that:

Comparisons are not permitted nor are numerical, alphabetical, or qualitative rating systems...[e]ach inventory area must be assessed on its own merits or in combination with an adjacent wilderness area or WSA as to whether an outstanding opportunity exists. There must be no comparison among areas [H-6310-1, Section .13(B)(3)(b), page 13]).

C. AWC Recommendation Toroweaps wilderness characteristics of "outstanding opportunities" for both solitude and a primitive and unconfined recreation, natural condition with imprints of man "largely [substantially] unnoticeable", and size meet the mandatory requirements of the Wilderness Act. The current naturalness, size, and outstanding opportunities for solitude and a primitive and unconfined type of recreation support wilderness designation.

1) Proposed Boundary Beginning at the proposed unit's northwestern corner at "Point 3" along BLM Route 1028 (Mt. Trumbull SE Quad; T34N, R8W); the in a southeasterly direction along aqueduct "3-4" travel way to its intersection with Section 16 (T3N, R7W); then in a southerly direction along Sections 16 , 21 and 28's western boundary

(excluding the private 1/8 section in Section 20) to the boundary's intersection with travel way C-D in Section 29; then in a southwesterly direction along travel way C-D to its intersection with state Section 32 (Toroweap landing strip); then heading due west along the northern boundary of Sections 32 and 31 to its intersection with Grand Canyon National Park (T34N, R8W, Section 25); then along the Park boundary in a northerly then westerly direction to its intersection with the private 1/2 section in Section 22 Mt. Logan Quad, T34N, R8W); then in due north along the eastern boundary of the private 1/2 section to BLM Route 1028 in Section 15; then in a northeasterly direction along 1028 to "Point 3).

2) Mandatory Wilderness Characteristics (Wilderness Character)ⁱ

a) Size

The proposed 6,015 Toroweap Wilderness, part of the 1.2 million-acre Grand Canyon National Park Wilderness, meets the BLM's wilderness size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Toroweap Wilderness, the answer to both questions is yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). Although the BLM noted in 1982 that the WSA has 3 miles of ways and one wildlife catchment, the agency stated these impacts "are effectively screened by the topography and vegetation" (USDI, BLM, 1982, EIS:48).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Most imprints, as noted by the BLM and verified through

recent citizen's inventories, are substantially unnoticeable. AWC maintains that it is reasonable to assume past impacts "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Toroweap's size (contiguous to the 1.2 million-acre Grand Canyon National Park proposed wilderness), terrain variation ranging from the undulating juniper and pinyon forests to expansive grasslands contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. Although the BLM's 1982 wilderness analysis ignored the area's wilderness character, the recent citizen's inventory demonstrates the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

3) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Toroweap's "optional Wilderness Characteristics" and include:

a) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

b) A geological treasure, including

- colorful, lava-capped Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River and the Grand Canyon....

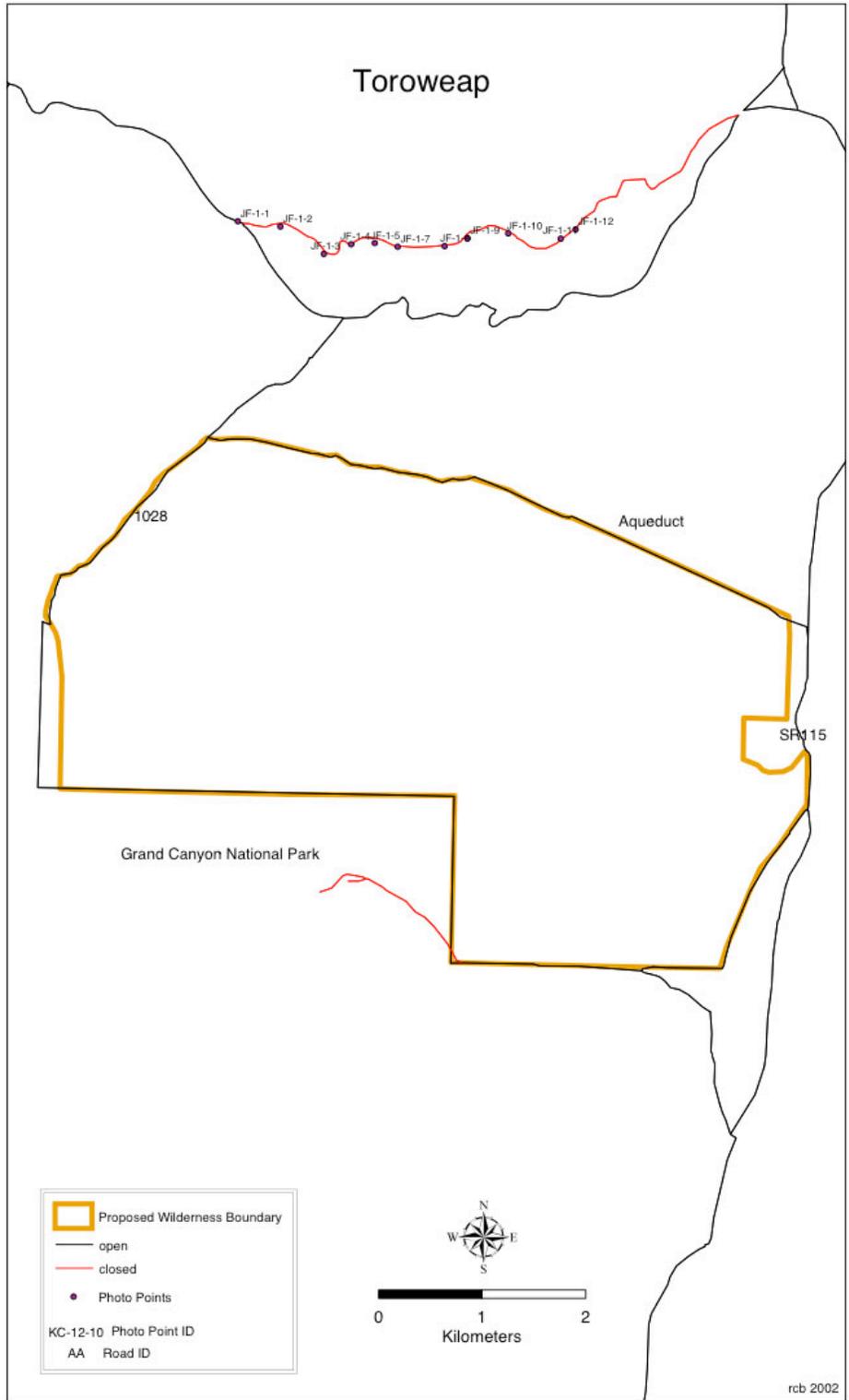
d) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including large concentrations of ancestral Puebloan villages, numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps. Areas of importance to existing Indian tribes.

e) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors linking the plateau to the Colorado River corridor below, allowing wildlife movement and plant dispersal
- Diverse wildlife

ⁱ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.



Vermilion Cliffs National Monument Wilderness Recommendation

Unit: Paria Canyon-Vermilion Cliff Proposed Wilderness Additions (Quads: Coyote Buttes, Emmett Hills, Emmett Wash, Ferry Swale, House Rock Spring, Navajo Bridge, One Toe Ridge, Poverty Flat, The Big Knoll, Water Pockets, Wrath Arch).

Summary: The Arizona Wilderness Coalition recommends 169,955 acres as additions to the existing Paria Canyon-Vermilion Cliffs Wilderness. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

Expansive stationary sand dunes, level-to-rolling plateau topography, pinyon-juniper woodlands, and Great Basin grasses comprise the Paria Plateau and the Vermilion Cliffs Natural Area. A variety of colorful sandstone buttes and knolls, physical challenges, archaeological resources, and spectacular scenic views enhance its wilderness character.

B. Historical Review and Critique of the 1982 WSA Decision Process

In its 1982 wilderness review, the BLM reported that

...only two portions of the Paria Plateau WSA provide outstanding opportunities to avoid the sights and sounds of others. Numerous buttes, ridges, alcoves, washes, and sand dunes on 5,760 acres in the White Pockets Hole-In-The-Rock area provide topographic screening for solitude and seclusion. These rugged features are part of the Paria Canyon erosional system.... [and the] unit provides opportunities for hiking, backpacking, horseback riding, photography, and viewing scenery. A variety of sandstone features, physical challenges, archaeological resources, and scenic views enhance these opportunities (USDI, BLM, 1982, EIS:45).... [the Overlook WSA] offers opportunities for hiking, backpacking, horseback riding, photography, and viewing scenery. A variety of sandstone features, physical challenges, archaeological resources and scenic views enhance these opportunities (USDI, BLM, 1982, EIS:46).

The BLM ignored the Paria Plateau's abundant outstanding opportunities for a primitive and unconfined types of recreation. Out of the 105,000-acre Paria Plateau WSA, the BLM recommended only 2,800 acres as suitable for wilderness designation (USDI, BLM, 1982, EIS:16). The Vermilion MFP Step II rejected wilderness suitability:

the unit [Overlook Unit 1-8B] lacks superior wilderness characteristics and variety and challenge in recreational opportunities (USDI, BLM, 1982, EIS:17). Solitude is primarily based on juniper-pinyon conifer and not topographic relief (USDI, BLM, 1982, EIS:17). The rest of the [Paria Plateau] WSA lacks topographic diversity and vegetation density, having level-to-rolling plateaus too open for backcountry travelers to experience outstanding solitude (USDI, BLM,

1982, EIS:45)... *The unit [Overlook WSA], however, lacks topographic diversity and vegetation density. The level-to-rolling plateau is too open for backcountry travelers to experience outstanding solitude* (USDI, BLM, 1982, EIS:46).

Current BLM policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). The evaluator should not assume that "simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Policy instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). In any event, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15). Finally, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both, and "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]).

The agency seemed determined to understate the Plateau's wilderness character and announced that

Most of this unit, though, does not provide regionally unique or significant opportunities [no mention of the type of opportunities] (USDI, BLM, 1982, EIS:46). A lack of topography diversity and the common occurrence of these vegetation types and this terrain throughout the most of the Four Corners region detract from potential outstanding primitive recreation opportunities (USDI, BLM, 1982, EIS:46). This unit [Overlook Unit 1-8B], though, does not provide regionally unique or significant opportunities [sic] (USDI, BLM, 1982, EIS:46).

Current BLM policy stresses that each inventory unit must be assessed on its own merits or in combination with an adjacent wilderness area or wilderness study area (USDI 2001 [H-6310-1, Section .13(B)(3)(b), page 13]) including other federal agencies such as the NPS (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]). While proximity and similarity to other wilderness areas enhances the unit's wilderness character, "regionally unique or significant opportunities" are not a prerequisite for wilderness designation nor does a landscape's ubiquitous qualities detract from an area's suitability as such. In addition, current BLM policy prohibits comparisons, numerical, alphabetical, or qualitative rating systems. Even under the earlier criteria, the unit should have been recommended for wilderness designation and not dropped from wilderness consideration.

C. AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)¹

a) Size

The proposed 169,955-acre Paria-Vermilion Cliffs Wilderness Additions meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

In its 1982 wilderness review, the BLM reported that

Numerous impact are scattered throughout Paria Plateau WSA, including 100 miles of ways, 37 miles of pipeline, 54 miles of fence, 15 reservoirs, four corrals and 11 troughs. The unit, however, retains its naturalness because these intrusions are well distributed throughout the unit and are effectively screened by topography and vegetation (USDI, BLM, 1982, EIS:45).

Today, the BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Paria Plateau Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). It's expansive grasslands and sand hills, picturesque sandstone buttes and knolls, and size creates a picturesque wilderness home to mule deer, mountain lions, bighorn sheep, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Paria Plateau's human imprints consist of primarily of little-use travel ways through deep, shifting sand not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). Most of travel way meets this criteria and is in fact "substantially unnoticeable" (photos).

The principal proposed "road" closures within the proposed wilderness consist of little-used section of travel way (see discussion below). These travel ways should be closed to vehicular access and stabilized to protect Monument values. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]). Agreements for essential maintenance of corrals or stock tanks can be developed as a condition of permit and under the minimum requirement process.

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.² Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c)³, provides a more permissive standard for designating a wilderness; a second definition, in section 4(c)⁴, provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Paria Plateau's Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos). While much of the area consists of gently rolling grasslands and sand hills, current BLM policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). As discussed above, the evaluator should not assume that "simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]).

Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM to reconsider the Paria Plateau's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Vermilion Cliffs National Monument Proclamation provide a compelling list of the Paria Plateau's "optional Wilderness Characteristics" and include:

- a) An area "[f]ull of natural splendor and a sense of solitude... [remaining] remote and unspoiled, qualities that are essential to the protection of the scientific and historic objects it contains."
- b) "Outstanding biological objects that have been preserved by remoteness and limited travel corridors," including:
 - A unique combination of cold desert flora and warm desert grassland
 - A variety of wildlife species, including at least twenty species of raptors; a variety of reptiles and amphibians; California condors; mammals, including desert bighorn sheep, pronghorn antelope, mountain lion; and one threatened species, Welsh's milkweed
- c) Artifacts of "a long and rich human history," including:
 - rock art, some of the earliest in the Southwest
 - High densities of Ancestral Puebloan sites, including remnants of large and small villages, some with intact standing walls, fieldhouses, trails, granaries, burials, and camps
 - remnants of historic ranch structures and associated objects that tell the stories of early settlement
- d) A geological treasure, including "the majestic Paria Plateau."

3) *Proposed Boundary*

a) *Wilderness Addition 1* (113,863 acres)

- *Exterior Boundary* Beginning in the addition's southwest corner at the extreme northwest corner of the Paria Canyon-Vermilion Cliffs Wilderness boundary (House Rock Springs Quad, T39N, R3E, Section 14) and continuing due north along the center of Section 14 to its intersection with the Four Springs private section; then due east along the private sections southern boundary; then due north along the private sections eastern boundary; then due west along the private sections northern boundary to its intersection with the 6,200-foot contour; then continuing along in a northerly direction approximately along the contour to its intersection with the northeast corner of the House Rock Spring private section in Section 10; then due west along the private section's northern boundary to its intersection (approximate) with the 6,000-foot contour; then in a northerly direction approximately along the contour to its intersection with the southern boundary of the Two Mile Spring private section in Section 34 (T40N, R3E); then due east along the private section's southern boundary; then due north along the private section's eastern boundary; then due west along the private section's northern boundary to its approximate intersection with the 6,000-foot contour; then in a northerly direction following the base of the cliffs to their intersection with BLM Route 1017 just west of BM5883 (House Rock Quad; T40N, R3E, Section 14); then in a northerly direction along an unnumbered travel way in to "Kitchens Tank" then along Coyote Wash in a northerly direction and passing east of Lone Tree Reservoir and continuing northward to the Paria Canyon-Vermilion Cliffs Wilderness boundary just east of BM5366 (Coyote Buttes Quad, T41N,

R3E, Section 23). The remainder of the exterior boundary follows the interior boundary of the Paria Canyon-Vermilion Cliffs Wilderness.

- *Interior Boundary* Beginning at the intersection of BLM Route 1017 and the western boundary of Section 27 at Pine Tree Pockets (One Toe Ridge Quad; T40N, R4E); then due south along the western boundary of Section 27; then due east along the southern boundary of Section 27 to its intersection with BLM Route 1104; then in a southerly then easterly direction along 1104 to its intersection with state Section 18; then due south along Section 18's west boundary; then due east along state Sections 17 and 18's southern boundary; then due north along Section 17's eastern boundary; then continuing due north along the eastern boundary of Section 8 to its intersection with BLM Route 1105; then continuing in an easterly direction along 1105 to its junction with BLM Route 1110 (The Big Knoll Quad; T39N, R5E, Section 9); then along 1110 in a northeasterly direction to its intersection with private land (Joe's Tank; The Big Knoll Quad; T40N, R6E, Section 31); then due south along the private section's western boundary; then due east along the private section's southern boundary; then due north along the private section's eastern boundary; then due west along the private section's northern boundary to its intersection with 1110; then continuing in a northeasterly direction along 1110 to its junction with BLM Route 1093 (The Big Knoll; T40N, R6E, Section 20); then in along 1093 in a northwesterly direction to its junction with 1088 (The Big Knoll; T40N, R6E, Section 20); then western direction along BLM Route 1088 to its junction with state sections in Wrather Arch Quad (T40N, R5E, Sections 1,2,11,12; and T41N, R5E, Sections 35,36); then along the state section in a northern then western then southern direction to its intersection with 1088 (T40N, R5E, Section 10); then in an easterly direction along 1088 to its junction with travel way D in Section 5 (Poverty Flats Quad; T40N, R5E); then in a northerly direction along travel way D to its junction with travel way L-G (Poverty Flats Quad, T41N, R5E, Section 20); then along L-G to its intersection with travel way L-J at point "J" in Section 18; then along L-J in a southerly direction to its junction with travel way H1-H2 at point H2 in Section 19; then along H1-H2 in a westerly direction to its junction with travel way H1-MM in at point H1 Section 23 (T41N, R4E); then along travel way H1-MM in a northerly then southerly direction to its junction with BLM Route 1081 at point MM (T41, R4E, Section 16); then along travel way MM-H3 to its junction with BLM Route 1081 at Poverty Flat in Section 27; then in a southerly direction along 1081 (excluding Red Pocket) to its junction with BLM Route 1066 in Section 5 (T40N, R4E); then along 1066 in a southerly direction to its junction with BLM Route 1017 in Section 19 (House Rock Spring Quad; T40N, R4E); then in an easterly direction (excluding the windmill area in Section 19) to the western boundary of Section 27 (One Toe Ridge; T40N, R4E) just west of Pine Tree Pockets.

b) Wilderness Addition 2 (13,198 acres) Beginning in the unit's southwestern corner at the junction of BLM Routes 1017 and 1066 (House Rock Springs Quad; T40N, R4E, Section 19); continuing along 1066 in a northeasterly direction to its junction with BLM Route 1081 at Red Pocket (Poverty Flat Quad; T40N, R4E, Section 5); then along 1081 in a northeasterly direction to its junction with travel way H3-H1 at point H3 at Poverty Flat (T41N, R4E, Section 28); then along travel way H3-H1 in a northeasterly direction to its junction with travel way H1-H2 at point H1 in Section 23; then along travel way

H1-H2 in an easterly direction to its junction with travel way L-J at point H2 in Section 19 (T41N, R5E); then along travel way L-J in a southerly direction to its junction with BLM Route 1087 in Section 12 (T40N, R4E); then along 1087 in a southwesterly direction to its junction with BLM Route 1017 at Pine Tree Pockets (One Toe Ridge Quad; T40N, R4E, Section 27); then along 1017 in a westerly direction to its junction with BLM Route 1066.

c) Wilderness Addition 3 (18,359 acres) Beginning at the unit's most western location at the junction of BLM Routes 1087 and 1105 at Pine Tree Pockets (One Toe Ridge Quad; T40N, R4E, Section 27); then along 1087 in a northeasterly direction to its junction with BLM Route 1088 near Big Sink (Poverty Flats Quad; T40N, R5E, Section 5); then along 1088 in an easterly direction to its intersection with state section 11 (Wrather Arch Quad; T40N, R5E); then in a southerly direction along the western boundary of Section 11; then in an easterly direction along Section 11's southern boundary to its intersection with travel way J-X in Section 13 (The Big Knoll Quad; T40N, R5E); then along travel way J-X in a southwesterly direction to its junction with BLM Routes 1105/1110 in Section 9 (T39N, R5E); then along 1105 in a westerly then northwesterly direction to its junction with 1087 at Pine Tree Pockets.

d) Wilderness Addition 4 (7,182 acres) Beginning in the unit's northwest corner at the junction of BLM Routes 1105 and 1104 (One Toe Ridge Quad; T40N, R4E, Section 27); then along 1104 in a southerly then easterly to its intersection with state section 18 (T39N, R5E); then along state sections 18's western boundary in a northerly direction; then along state sections 18 and 17 northern boundary in an easterly direction to its intersection with BLM Route 1105; then along 1105 in a northwesterly direction to its junction with BLM Route 1104 in Section 27.

e) Wilderness Addition 5 (6,483 acres) Beginning in the unit's southeast section at the junction of the Dominguez-Escalante Historic Trail and the Paria-Vermilion Cliffs Wilderness in Section 6 (Ferry Swale; T40N, R8E); then continuing in a northerly direction along the Dominguez-Escalante Historic Trail past Willow Tank to its intersection with the Monument boundary at BM 4104T (T41N, R8E, Section 19); then in a westerly direction along the Monument boundary to its intersection with the "Cedar Mountain Catchment" road in Section 31 (Water Pockets Quad; T41N, R7E); then along this road in a southerly direction to its junction with travel way R-O-M2 at "R" (T41N, R6E, Section 12); then in an easterly direction along R-O-M2 to its junction with travel way "N" (east M2-M1; T41N, R6E, Section 10); then along "N" to the Paria Canyon-Vermilion Cliffs Wilderness boundary in Section 31; then in an easterly direction along the Paria Canyon-Vermilion Cliffs Wilderness boundary to its intersection with the Dominguez-Escalante Historic Trail in Section 6 (Ferry Swale; T40N, R8E).

f) Vermilion Cliffs Natural Area Wilderness Addition (7,182 acres). The entire area outside the Paria Canyon-Vermilion Cliffs Wilderness is proposed as Wilderness.

g) Glen Canyon Wilderness Addition (Approximately 3,198 acres); this unit is contiguous with the Glen Canyon National Recreation wilderness proposal. Beginning at

the southeast corner at the intersection of the Monument boundary and the Glen Canyon National Recreation boundary in the southeast corner of Section 21 (Ferry Swale Quad; T41N, R8E); then in an alternating southerly and westerly direction along the NRA boundary to its intersection with the Paria Canyon-Vermilion Cliffs Wilderness boundary at the bottom of Section 6 (T40N, R8E); then along the Wilderness Boundary to its intersection with the Dominguez-Escalante Historic Trail; then along the Dominguez-Escalante Historic Trail in a northerly direction to its intersection with the Monument boundary in Section 19 (T41N, R8E); then along the Monument boundary in an northeasterly direction to its intersection with the Glen Canyon National Recreation boundary in the southeast corner of Section 21 (Ferry Swale Quad; T41N, R8E).

4) Travel Way Closures

a) Wilderness Addition 1

- LG (Poverty Flat Quad); an eroding (photo LA-4-16), redundant travel way depicted on the BLM map (USDI, 2000) and the Poverty Flat Quad as a "jeep trail," this route should be closed to protect monument values. The travel way should be closed to mechanized travel in order to protect monument values and discourage illegal traffic in the designated wilderness. Access for essential maintenance of the tank can be provided through administrative agreements with the BLM.
- D (Poverty Flat Quad); an eroding (photo LA-4-4) travel way depicted on the BLM map (USDI, 2000) and the Poverty Flat Quad and providing access to a steel water tank in Section 20 (T41N, R5E) and continuing on into the Paria Canyon-Vermilion Cliffs Wilderness (photo LA-4-7).
- F (Poverty Flat and Wrather Arch Quads); an eroding (photo LA-4-21) that provides access to an earthen tank in Section 16. The route ends at the Paria Canyon-Vermilion Cliffs Wilderness boundary and encourages illegal ATV access. It should be closed to mechanized travel. Essential maintenance of the tank can be provided through the minimum requirement process. The "4WD" route depicted on the BLM map (USDI, 2000) and the quads as beginning north of BLM Route 1088 in Section 5 (Poverty Flats Quad; T40N, R5E) and ending in Section 21 (Wrather Arch Quad; T41N, R5E) could not be located. It should be removed from the maps and classified as closed to mechanized travel.
- BLM Route 1091 (Wrather Arch Quad); north of the state section 35, a little-used route to nowhere (photo LB-2-2,3) that penetrates the Paria Canyon-Vermilion Cliffs Wilderness (photo LB-2-1). The route should be closed north of state section 35 to protect Monument resources and values.
- K-L (Big Knoll and Wrather Arch Quads); the travel way, depicted on the BLM map (USDI 2000) and the quads, appears abandoned or little used beyond the Middle Reservoir fence (photos KC-42-14). It should be closed to all mechanized travel to protect Monument values. Any essential maintenance of grazing features should be developed through a minimum requirement process. The spur L1 (photo KC-42-14) provides redundant access to Middle Reservoir and should be closed as well.
- F-A (Navajo Bridge and Water Pockets Quads); a redundant access road to a ranch complex in Section 3 (Water Pockets Quad; T40N, R6E). The travel way begins a point "A" in Section 15 (Navajo Bridge Quad) and ends at the ranch. A redundant travel way, it should be closed to mechanized travel to protect Monument values.

- A-B; a little-used (photos KC-42-22,24), eroding travel way beginning at its junction with BLM Route 1093 (Water Pockets Quad, T41N, R6E, Section 27) providing access to a metal stock tank in Section 28 (Wrather Arch Quad). The route should be close to mechanized travel. Provision for essential maintenance of the tank can be determined through the minimum requirement process.
- Q-R; an eroding (photo EC-1-18) travel way that disappears in Section 17 (Navajo Bridge). It is a "road to nowhere" that should be closed to mechanized use and converted to a hiking and pack trail to the Powell Monument overlook. It can connect to the pack trail depicted in Sections 23 and 24 (R6E) and Sections 18 and 19 (R7E).
- N-O-P; depicted on the BLM map (USDI 2000) and the quads (The Big Knoll, T40N, R6E, Section 21; and Navajo Bridge, Sections 15 and 22) as a 4WD route is a redundant travel way and should be closed to protect monument values. A similar spur depicted in Section 22,23 should be closed as well.
- AE; depicted on the BLM map (USDI 2000) and the Big Knoll quad, AE is an eroding and highly impacting route to slickrock tanks (photos LA-3-11,12). It should be closed to mechanized travel to protect Monument values.
- R; depicted on the BLM map (USDI 2000) and the One Toe Ridge Quad (T39N, R5E, Section 19), is a little used (photo KC-28-8), eroding (photo KC-28-9) "road-to-nowhere" ending at the Paria Canyon-Vermilion Cliffs Wilderness boundary. It should be closed to mechanized travel to protect Monument values.
- Black Valley; little used or abandoned travel way (photo KC-41-9) depicted on the BLM map (USDI 2000) and The Big Knoll Quad (T39N, R6E, Sections 7, 8 and 18) should be closed to mechanized travel to protect Monument values.
- BLM Route 1108; the proposed closure extends along most of 1108 beginning at the southern boundary of state Section 18 (One Toe Ridge Quad; T39N, R5E) and continuing in a easterly then northerly direction to its junction with BLM Route 1110 (The Big Knoll Quad, T39N, R5E, Section 1). The route is little used (photo KC-41-1,6) and extremely sandy and susceptible to erosion (photo-41-1,8). Archeological features consisting of scattered lithics are impacted by vehicular traffic (photo KC-41-5). The route provides no essential function and should be closed to mechanized travel to protect Monument values. Essential maintenance to stock tanks in Section 28 (The Big Knoll Quad; T39N, R5E) and Section 29 (Emmett Hill, T39N, R5E) can be determined through a minimum requirement analysis. The placement and maintenance of the portable weather station (Emmett Wash Quad; T39N, R5E, Section 35) and rain gauge (One Toe Ridge, T39N, R4E, Section 25) can be determined thorough the minimum requirement process.
- D1, D2; these redundant, eroding (One Toe Ridge; photo LA-3-17), and little-used (photos LA-3-18,21) should be closed to protect monument values. The routes severely impact archeological lithic sites (photo LA-3-18) and should be closed to protect Monument values.
- U; a little used (photo LA-3-33), eroding (photo LA-3-28) impacting lithic scatter sites (photo LA-3-32). It should be closed to mechanized travel to protect Monument values.
- AD; a redundant, little used (photo LA-2-4), eroding (photo LA-2-3) providing access to a water trough in Section 5 (One Toe Ridge Quad, T39N, R4E) and an abandoned trough in the northern end of Section 5. The route should be closed to mechanized

travel to protect Monument values. Essential access to the trough approximately 1/2 mile to the northeast of BLM Route 1100 can be determined through application of the minimum requirement process.

- BLM Route 1103; an eroding (photo KC-45-24), little used or abandoned travel way (photo KC-46-1) depicted on the BLM map (USDI 2000) as beginning at its junction with BLM Route 1104 (One Toe Ridge Quad; T40N, R4E, Section 34) and ending at its junction with BLM Route 1100 in Section 8. It appears from the map to provide access to Moquitch Tank, but the condition of the route indicates little, if any use from 1100 and its junction with 1104 cannot be discerned. The travel way should be closed to mechanized travel to protect Monument values.
- L-B; a redundant, eroding (House Rock Spring; T40N, R3E, Section 25) photos KC-33-5,2), little used (photo KC-33-6) travel way incorrectly depicted on the BLM map (USDI 2000). It should be closed to protect Monument values.
- K1; a redundant, apparently abandoned travel way (photos LA-1-14,15,16) depicted on the House Rock Spring Quad. It should be closed to mechanized travel and removed from the quad.
- BLM Route 1100 (House Rock Springs/One Toe Ridge Quads); an eroding (photos KC-29A-2; KC-28-21) that directly bisects the West Bench Pueblo (photo KC-28-24). The road should be closed near the base of the slope (approximately 1/2 mile downslope), stabilized with water bars and checks, and converted to a hiking trail. Any possible relocation of the road would severely impact well-developed microbiotic crusts, lithic scatter sites and possible subsurface archeological features (photo KC-28-25), important Monument resources. While 1100 provides access to a water pump, windmill and other grazing features in Section 6 (T39N, R4E), access to these structures can be provided through the proposed cherry stem travel way "A." Closing this route would greatly facilitate the other proposed closures within the proposed wilderness addition and would provide substantial protection of Monument values.
- G1-G2; a sandy, eroding (photo KC-32-20) travel way in Sections 18 and 19 (House Rock Spring Quad, T39N, R4E) that accesses a scenic view of the Vermilion Cliffs. The vista is not as spectacular as those accessed elsewhere, and resource damage by this route is excessive. It should be closed to protect Monument values.
- G-H; a sandy (photo KC-32-22) travel way with severely eroding spurs (photo LB-1-8,9) that provides access to a condor feeding station (photo KC-32-15). The travel way begins at the terminus of the proposed cherry stem "A" (House Rock Spring Quad, T39N, R4E, Section 6) and loops to the south through Sections 18 and 17, and Sections 1, 12 and 13 (R3E). The travel way should be closed to protect Monument values. Access to the condor feeding station can be determined through application of the minimum requirement process.
- I; an abandoned travel way (House Rock Spring Quad) that once impacted an archeological site (photo LA-1-6). The travel way is recovering through the establishment of microbiotic crust (photos LA-1-3,4). It should be closed to all mechanical travel to protect Monument values.
- J; an abandoned travel way (photo LA-1-10) in Sections 36 (House Rock Spring Quad, T40N, R3E) and 31 (T40N, R4E). It should be closed to protect Monument values.

- K; an eroding (photo LA-1-20) "road to nowhere" in Section 36 (House Rock Spring Quad, T40N, R3E), it should be closed to protect Monument values.
- O; a little used (photo CB-1-3) travel way beginning off of BLM Route 1100 (House Rock Spring Quad, T40N, R3E, Section 26) to access a steel tank in Section 35. The route should be closed to mechanized travel. Essential maintenance of the tank can be determined through the minimum requirement process.
- S-T; a little used (photo KC-32-13) "road to nowhere" in Section 26 (House Rock Spring Quad, T40N, R3E). It should be closed to protect Monument values.
- E-E1; a redundant, eroding (House Rock Spring Quad, T40N, R3E, Sections 13-14; photo DC-1-19) "road to nowhere" that runs parallel to BLM Route 1017. It should be closed to mechanized travel to protect Monument values.
- C-E; a redundant, little used (photo KC-46-11) travel way that impacts the steep slopes of Sections 25 and 36 (Coyote Buttes Quad; T41N, R3E). It should be closed to protect Monument values.
- B-D (Coyote Buttes/Poverty Flats Quads; T41N, R3E, Sections 25, 35, 36)); a redundant, eroding (photos DC-1-3,5) access to Paw Hole. Eroding, deep sand forces some users to select alternate routes (photo DC-1-1), compounding the negative impacts. The route should be closed to protect Monument values. Access to Paw Hole can be accomplished through the proposed cherry stem D-K.
- G-F-E; an eroding (photo KC-46-17), redundant travel way to the wildlife water catchment (Ladder Reservoir) in Section 36 (Coyote Buttes Quad; T41N, R3E). The route should be closed to mechanized travel to protect Monument values. Access to the wildlife catchment can be determined through the minimum requirement process.
- A-F; a little used (photo AA-7-12) travel way providing redundant access to the Ladder Reservoir wildlife catchment. The route should be closed to mechanized travel to protect Monument values. Access to the wildlife catchment can be determined through the minimum requirement process.
- J-K; a redundant shortcut to the Paw Hole-Cottonwood Cove junction (Poverty Flat Quad; T41N, R4E, Section 28), it should be closed to protect Monument values.

b) Wilderness Addition 2

- C-F-G; a redundant shortcut (photo LB-2-17) between Pine Tree Pockets (One Toe Ridge Quad; T40N, R4E, Section 27) and BLM Route 1081. It should be closed to mechanized travel to protect Monument values.
- F-A; a little used (photo LB-2-19), redundant route from travel way C-F-G to Red Pocket (Poverty Flats Quad; T40N, R3E, Section 5. It should be closed to mechanized travel to protect Monument values.
- BB1; an little used (photo KC-45-21) access to an illegal dump (photo KC-45-22). The dump should be cleaned up and the route closed to mechanized travel to protect Monument values.

c) Wilderness Addition 3

- ZZ; a redundant, little used (photo LA-2-24), eroding (photo LA-2-22) travel way beginning at point Z (One Toe Ridge Quad, T40N, R5E, Section 30) and ending at travel way Y-X at BM6350 (The Big Knoll; T40N, R5E, Section 23). It should be closed to mechanized travel to protect Monument values.

- N; a redundant, eroding (photo LA-2-17) travel way beginning at its junction with BLM Route 1105 (One Toe Ridge Quad, T40N, R4E, Section 36) and ending at its junction with cherry stem M near BM6590 in Section 25.
- M1-M2; a redundant, little used (photo LA-2-12) travel way running parallel to cherry stem M in Section 25 (One Toe Ridge Quad; T40N, R4E, Section 25). It should be closed to mechanized travel to protect Monument values.
- Z-C; a redundant, little used (photos LB-2-15,16) travel way. It should be closed to protect Monument values.

d) Wilderness Addition 5

- M (M1-M2); a redundant travel way in Sections 3 and 10 (Water Pockets Quad; T41N, R6E) that currently forms the existing wilderness boundary (photos KC-60-18,20). Travel way "N" is the primary route and contains less eroding section. AWC recommends closing travel way M and converting to a hiking trail.
- O-P; a redundant loop route in Sections 11,12,13 (Water Pockets Quad; T41N, R6E) and Section 18 (T41N, R7E). This route consist of eroding, loose sand (photo KC-60-21). A significant number of impacted camping sites occur along this rim road affecting Monument resources, including an undetermined number of archaeological sites. We recommend restoring the impacted sites to a natural condition and converting the route into a scenic hiking trail.
- "T"; a short "road to nowhere" in Section 31 (Water Pockets Quad; T42N, R7E) should be closed to mechanized use and restored to a natural condition to protect Monument values.
- "Q"; a travel way in Section 5 (Water Pockets Quad; T42N, R7E) providing access to the Paria Canyon-Vermilion Cliffs Wilderness. The proposed closure to mechanized travel would add about 0.5 miles to the existing wilderness trail, and it would provide additional protection to Monument resources.
- "W"; provides access to a water catchment in Section 4 (Water Pockets Quad; T42N, R7E). Closure to mechanized travel would protect Monument values. An agreement with the permittee to provide essential maintenance to the tank can be arranged under the minimum requirement process.
- C-D-E-G; a redundant travel way in Sections 13, 24 (Ferry Swale; T41N, R7E) and Section 19 (T41N, R8E) has resulted in numerous impacts and follows an active wash for much of its length. It should be closed to protect monument values.

5) Cherry Stems

a) Wilderness Addition 1

- BLM Route 1093 (Bush Head Tank Road) provides access to the reservoir in Section 27 (Water Pockets Quad, T41N, R6E, Section 27).
- BLM Route 1017.
- Travel way "C" provides access from its junction with travel way A-N in Section 15 (Navajo Bridge, T40N, R6E) to corrals in Section 12 (Water Pockets). The routes depicted on the BLM map (USDI 2000) and the quads east of the corral provide no essential service and should be closed to mechanized travel to protect Monument values.

- Seven Mile Overlook, (travel way M-N-A-Q) beginning at BLM Route 1093 (The Big Knoll Quad, T40N, R6E, Section 20) and ending at the overlook at the Paria Canyon-Vermilion Cliffs Wilderness boundary at point "Q" (Navajo Bridge Quad, T40N, R6E, Section 25; see photo EC-1-18).
- Travel way F-G (One Toe Ridge Quad; T39N, R4E, Sections 13 and 23) provides access to a camping area and spectacular view of House Rock Valley. It is the boundary between Wilderness Addition 2 and Wilderness Addition 3.
- Travel way "A" provides access from Pine Tree Pockets to the corral and water pump in Section 6 (House Rock Springs Quad, T39N, R4E).
- Paw Hole Road (J-K) begins at the Paw Hole-Cottonwood Cove Road intersection (Poverty Flat Quad, T41N, R4E, Section 28) and terminates at Paw Hole trailhead (Coyote Buttes Quad; T41N, R3E, Section 25).

c) Wilderness Addition 3

M-Z; an access route to tank (One Toe Ridge Quad, T40N, R4E, Section 25).

d) Wilderness Addition 5

P-R; an access route in Section 12 (Water Pockets Quad; T41N, R6E) and Section 18 (T41N, R7E) to a scenic overlook of the Paria Canyon-Vermilion Cliffs Wilderness (KC-60-24).

e) Vermilion Cliffs Natural Area

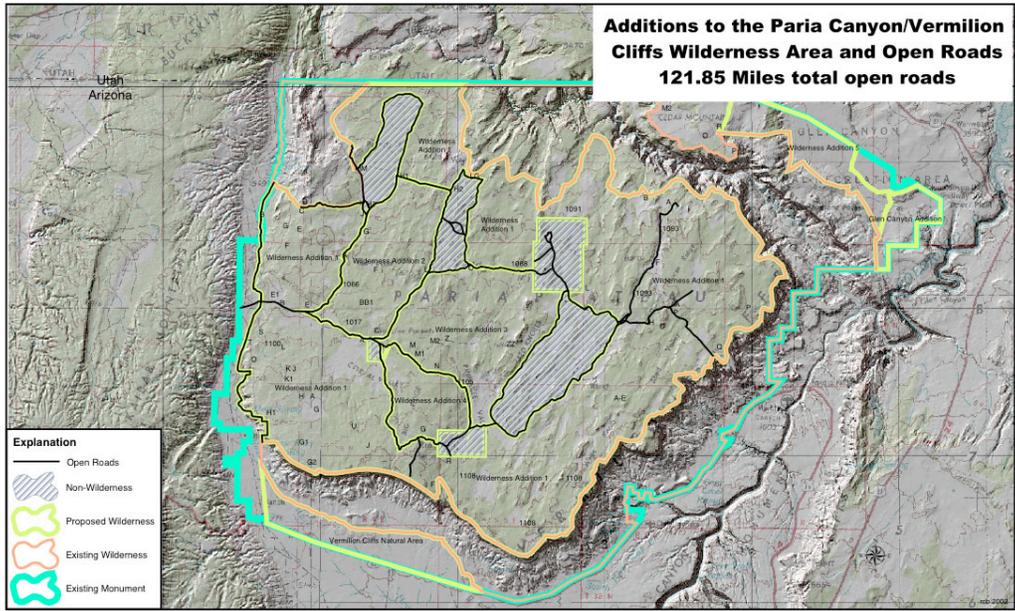
The route to the private inholding at Jacobs Pool (Emmett Hills Quad, T38N, R5E, Section 6) and beginning on Highway 89A at BM 5004 in Section 18.

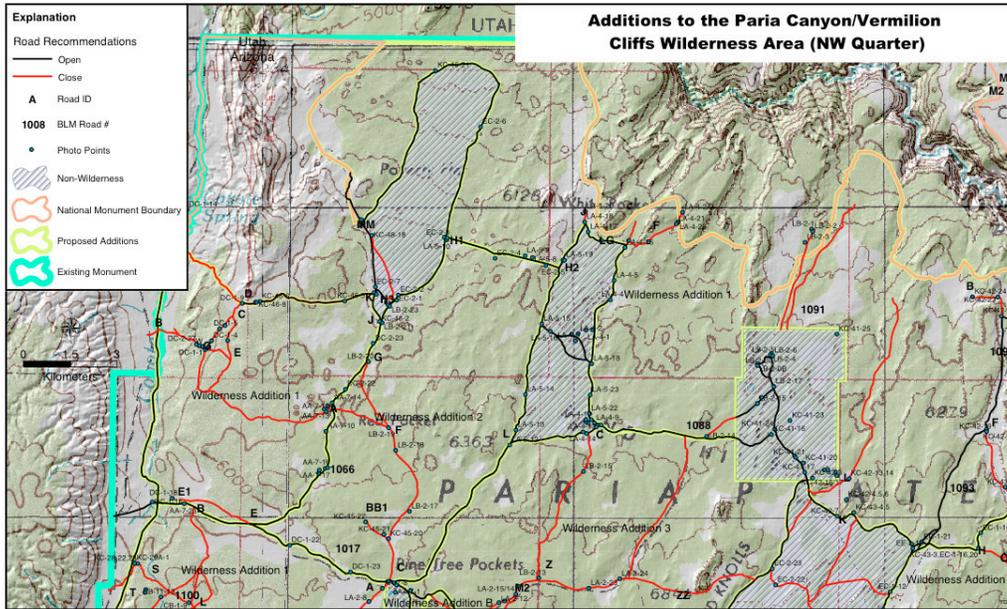
¹ "Wilderness Character", according to the BLM, consists of the "mandatory" and "optional" characteristics presented in Section 2(c) of the Wilderness Act. See USDI 2001, [H-6310-1, Section .13(B), page 10.

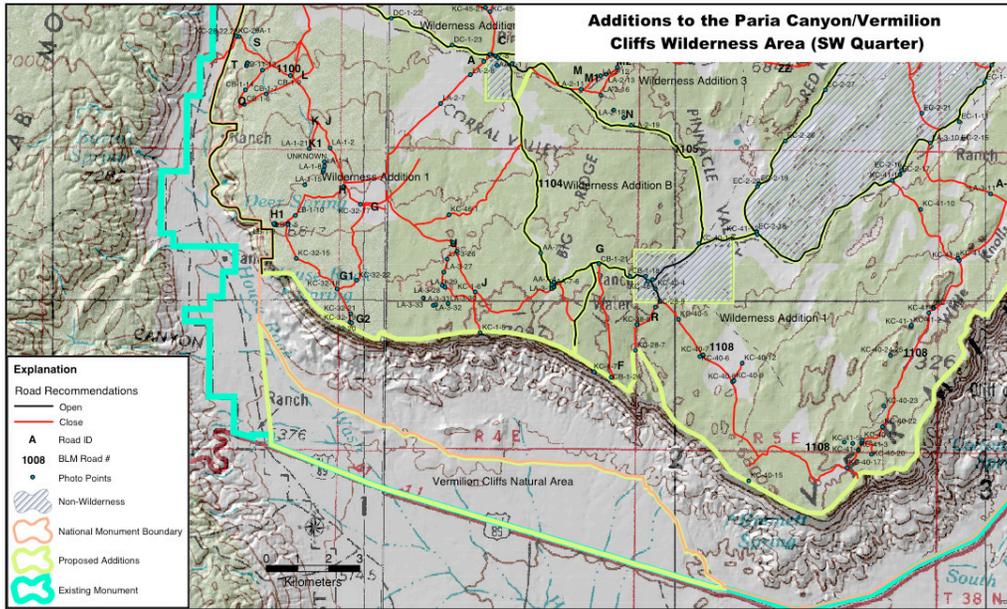
² The third wilderness area designated by Congress after the 1964 Wilderness Act was the Great Swamp Wilderness in New Jersey, just 30 miles from Times Square. The local township agreed to close and restore to a natural condition a paved, two-lane road with ditches, shoulders, several bridges, and several suburban homes on private inholdings in order to qualify the area for wilderness. See Scott 2001, page 31.

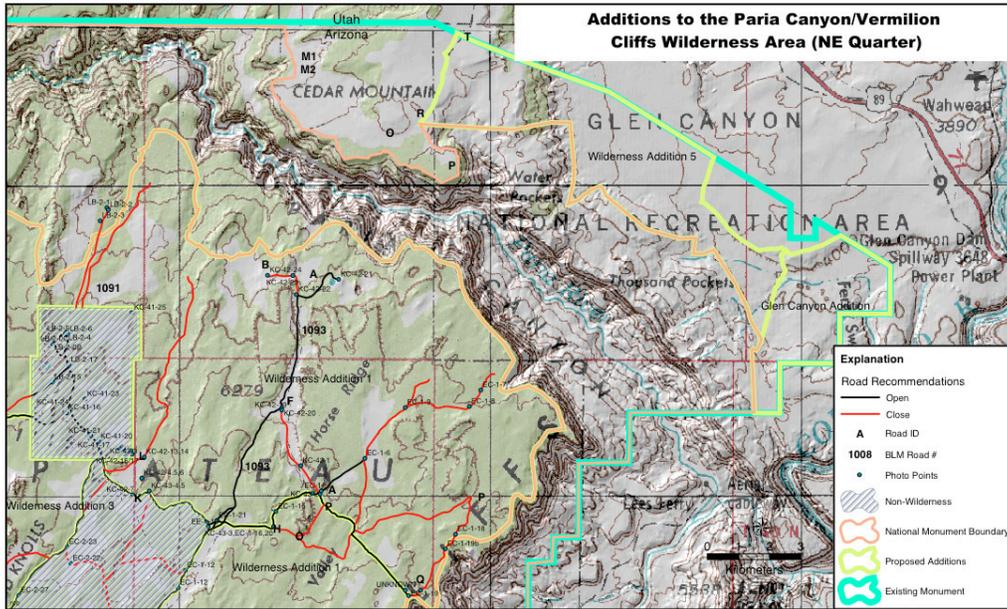
³ "Definition of Wilderness," Section 2(c) A wilderness, in contrast with those areas where man and his own works dominated the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

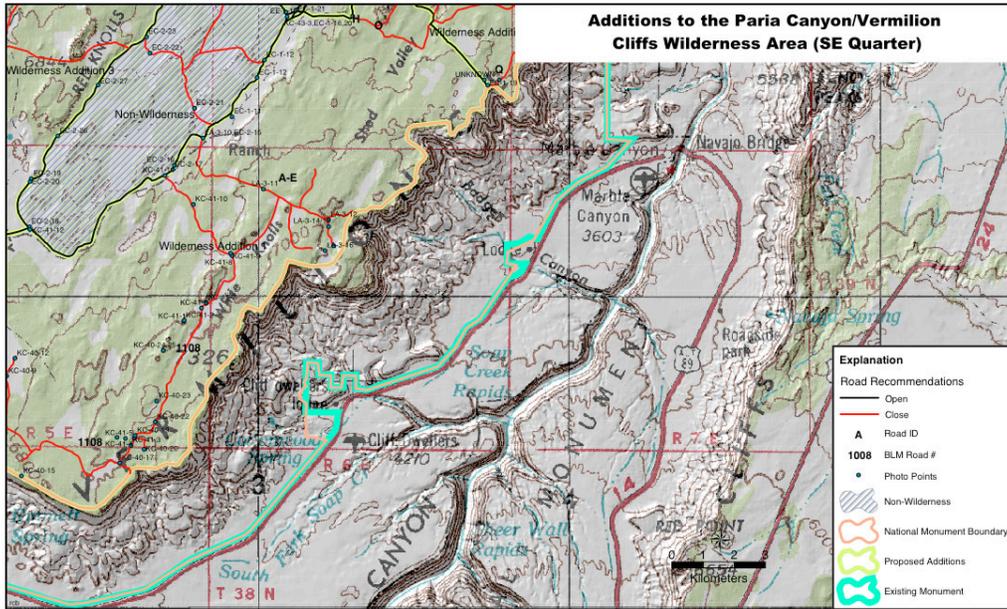
⁴ "Prohibitions of certain Uses", Section 4(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measure required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.











PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 1



1. EC-1-8; Water Pockets Quad; T40N, R7E, Section 6; view toward southeast of travel way C. The route is typical of the "Sand Hills."



2. EC-1-18; Navajo Bridge Quad; T40N, R7E, Section 19; view toward the northeast of travel way Q-R. The route is extremely sandy and disappears a short distance beyond this point.



3. EC-1-19; Navajo Bridge Quad; T40N, R7E, Section 25; scenic view of the Marble Platform near Badger Canyon from the top of Seven Mile Draw.



4. KC-42-13; Big Knoll Quad; T40N, R6E, Section 7; view toward the east of travel way L1 (off of K-L) to Middle Reservoir in state section 12.

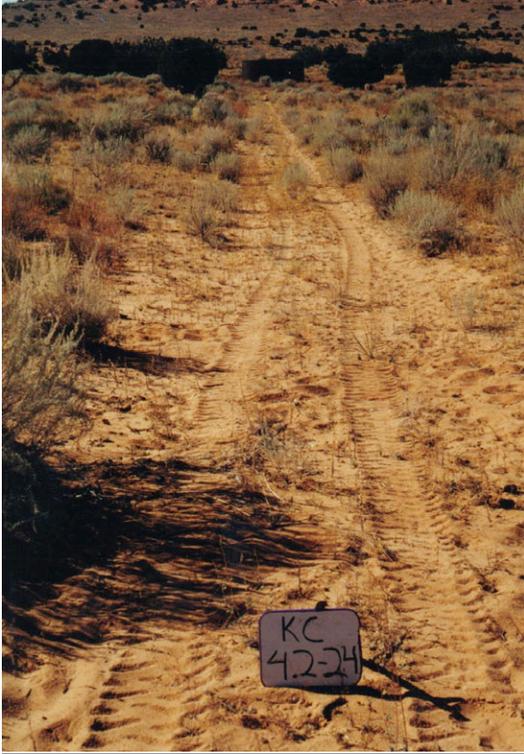


5. KC-42-14; Big Knoll Quad; T40N, R6E, Section 7; view toward the northeast of travel way K-L. The travel way toward Lynn Tank and Jays Pond is substantially unnoticeable and appears abandoned.



6. KC-42-22; Water Pockets Quad; T41N, R6E, Section 27; view toward the north of travel way A-B at its junction with BLM Route 1093.

PARIA CANYON-VERMILION
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7. KC-42-24; Wrather Arch Quad; T41N, R6E, Section 28; view toward the north of travel way A-B near its terminus at the steel tank at point B. Due to severe erosion, the route is not passable to standard four-wheel drive vehicles.



8. KC-43-1; Navajo Bridge Quad; T40N, R6E, Section 15; view toward east of average condition of travel way F-A.



10. LA-4-7; Poverty Flats Quad; T41N, R5E, Section 17; view of travel way D at the wilderness boundary. The route continues into the designated wilderness to the knoll to the west.



9. LA-4-4; Poverty Flats Quad; T41N, R5E, Section 29; view toward northeast of an eroding section of travel way D.



11. LA-4-10; Poverty Flats Quad; T40N, R5E, Section 5; view toward the south of an average section of travel way D.

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12. LA-4-16; Poverty Flats Quad; T41N, R5E, Section 20; view toward the northwest severe erosion of travel way LG.



13. LA-4-20; Wrather Arch Quad; T41N, R5E, Section 21; view toward the northeast of travel way F.



14. LA-4-21; Wrather Arch Quad; T41N, R5E, Section 16; view toward the northeast of eroding section of travel way F.



15. LA-4-22; view toward the southeast of ATV incursion off-route of travel way F.



16. LB-2-1; Wrather Arch Quad; T41N, R5E, Section 24; end of BLM Route 1091 inside Paria Canyon-Vermilion Cliffs Wilderness boundary. Illegal ATV tracks continue further into wilderness.



17. LB-2-2; Wrather Arch Quad; T41N, R5E, Section 24; end of BLM Route 1091.

PARIA CANYON-VERMILION
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18. LB-2-3; Wrather Arch Quad; T41N, R5E, Section 24; average condition of BLM Route 1091 north of state section 35.

PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 1



1. CB-1-22; One Toe Ridge Quad; T39N, R4E, Section 25; hogan on travel way G1.



2. CB-1-22; One Toe Ridge Quad; T39N, R4E, Section 25; route condition of travel way G1 indicates little use.



3. CB-1-25; One Toe Ridge Quad; T39N, R4E, Section 24; view of erosion on travel way G1.



4. KC-28-8; One Toe Ridge Quad; T39N, R5E, Section 19; view of travel way R. The route is little used and remains substantially unnoticeable.



5. KC-28-9; One Toe Ridge Quad; T39N, R5E, Section 19; view of an eroding section of travel way R.

**PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 1**



6. KC-40-5; One Toe Ridge Quad; T39N, R5E, Section 19 view toward the north of a recovered chained area in Wilderness Addition Unit #2.



7. KC-41-1; The Big Knoll Quad; T39N, R5E, Section 24; view toward the northeast of BLM Route 1108.



8. KC-41-5; The Big Knoll Quad; T39N, R5E, Section 35; view toward the east of archeological site severely impacted by vehicular activity on spur route just off BLM Route 1108.



9. KC-41-6; The Big Knoll Quad; T39N, R5E, Section 24; view toward the north of BLM Route 1108. The route appears little used.



10. KC-41-8; The Big Knoll Quad; T39N, R6E, Section 18; view toward the southeast an eroding section of BLM Route 1108. The ruts are approximately 15 inches deep.



11. KC-41-9; The Big Knoll Quad; T39N, R6E, Section 18; view toward the east of Black Valley travel way. It appears abandoned.

PARIA CANYON-VERMILION
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12. LA-3-11; The Big Knoll Quad; T39N, R6E, Section 5; view toward the east of eroding section of travel way AE. The photo shows one of numerous spurs bypassing worst sections of the travel way.



13. LA-3-12; The Big Knoll Quad; T39N, R6E, Section 9; view toward the east of average section of travel way AE.

**PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 1**



1. CB-1-3; House Rock Springs Quad; T40N, R3E, Section 26; view of travel way O.



2. KC-29A-2; House Rock Springs Quad; T40N, R3E, Section 27; view of an eroding section of BLM Route 1100 approximately 1/2 mile below (south) of the West Bench Pueblo in section 23 (see photo KC-28-24).



3. KC-28-21; House Rock Springs Quad; T40N, R3E, Section 23; an eroding section of BLM Route 1100 immediately above the arch site (see photo KC-28-24).



4. KC-28-22; House Rock Springs Quad; T40N, R3E, Section 23; West Bench Pueblo impacted by BLM Route 1100.



5. KC-28-24; House Rock Springs Quad; T40N, R3E, Section 23; BLM Route bladed through West Bench Pueblo.



6. KC-28-25; House Rock Springs Quad; T40N, R3E, Section 23; dense microbial crust with scattered lithics surrounding West Bench Pueblo.

PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 1



7. KC-32-13; House Rock Springs Quad; T40N, R3E, Section 26; view of little used travel way S-T.



8. KC-32-15; House Rock Springs Quad; T39N, R3E, Section 13; view of spur off of travel way G-H, an apparent access to the condor feeding station.



9. KC-32-20; House Rock Springs Quad; T39N, R4E, Section 19; view of an eroding section of travel way G1-G2.



10. KC-32-22; House Rock Springs Quad; T39N, R4E, Section 18; average route condition of travel way G-H.



11. KC-33-1; House Rock Springs Quad; T40N, R3E, Section 24; view toward the south of travel way M depicted on the BLM map (USDI 2000) at its junction with L-B. M is abandoned.



12. KC-33-2; House Rock Springs Quad; T40N, R3E, Section 24; view is toward the southeast of an eroding section of travel way L-B.

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13. KC-33-5; House Rock Springs Quad; T40N, R3E, Section 24; view is toward the south of an eroding section of travel way L-B.



14. KC-33-6; House Rock Springs Quad; T40N, R3E, Section 24; view toward the northwest of travel way L-B. The route appears to receive little regular use.



15. KC-45-24; One Toe Ridge Quad; T39N, R4E, Section 9; view to toward the east of a severely eroded section of BLM Route 1103.



16. KC-46-1; One Toe Ridge Quad; T39N, R4E, Section 9; view is toward the northeast of the little used or abandoned BLM Route 1103.



17. LA-1-3; House Rock Springs Quad; T39N, R3E, Section 1; view of travel way I. Note establishment of microbial crusts on travel way surface.



18. LA-1-4; House Rock Springs Quad; T39N, R3E, Section 1; view of microbial crust on travel way I.

PARIA CANYON-VERMILION
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19. LA-1-6; House Rock Springs Quad; T39N, R3E, Section; view of archaeological site on travel way I.



20. LA-1-10; House Rock Springs Quad; T40N, R3E, Section 36; view of abandoned travel way J.



21. LA-1-14; House Rock Springs Quad; T39N, R3E, Section 1; view indicates travel way K1 is abandoned.



22. KC-1-15; House Rock Springs Quad; T39N, R3E, Section 1; travel way K1 appears abandoned.



23. LA-1-16; House Rock Springs Quad; T39N, R3E, Section 1; view of travel way K1 indicates route is abandoned.



24. LA-1-20; House Rock Springs Quad; T40N, R3E, Section 36; view of eroding section of travel way K.

PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 1



25. LA-2-3; One Toe Ridge Quad; T40N, R4E, Section 32; view shows an severely eroded section of travel way AD.



26. LA-2-4; One Toe Ridge Quad; T40N, R4E, Section 32; view toward the south of travel way D junction with cherry stemmed travel way A. The route appears little used.



27. LA-3-17; One Toe Ridge Quad; T39N, R4E, Section 14; view is toward the southeast of an eroding section of travel way D2 at its junction with BLM Route 1104.



28. LA-3-18; One Toe Ridge Quad; T39N, R4E, Section 14; view is toward the southeast of the junction of travel way D1 with BLM Route 1104. The route appears abandoned, but past travel has severely impacted an archaeological lithic site at this location.



29. LA-3-21; One Toe Ridge Quad; T39N, R4E, Section 23; view is toward the northwest of the end of travel way D1.



30. LA-3-28; One Toe Ridge Quad; T39N, R4E, Section 16; view is toward the southeast of an eroding section of travel way U.

PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 1



31. LA-3-30; One Toe Ridge Quad; T39N, R4E, Section 20; view toward the east of an improvise camp.



32. LA-3-32; One Toe Ridge Quad; T39N, R4E, Section 20; lithic site adjacent to travel way U.



33. LA-3-33; view toward the southeast of travel way U as it ends in thick brush.



34. LA-3-34; House Rock Spring Quad; T39N, R4E, Section 7; view toward the northeast of the junction of travel way AD with BLM Route 1100.



35. LB-1-8; House Rock Springs Quad; T39N, R3E, Section 11; severe erosion of spur H1 off of travel way G-H.



36. LB-1-9; House Rock Springs Quad; T39N, R3E, Section 12; severe erosion of spur H1 at junction with travel way G-H.

PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 1



1. AA-7-12; Poverty Flats Quad; T40N, R3E, Section 25; view toward the west of travel way A-F near Red Pocket (point A). The route is revegetating.



2. DC-1-1; Coyote Buttes Quad; T41N, R3E, Section 36; user-created detour on travel way B-D.



3. DC-1-3; Coyote Buttes Quad; T41N, R3E, Section 36; view toward the northwest of severe erosion of travel way B-D.



4. DC-1-5; Coyote Buttes Quad; T41N, R3E, Section 36; view toward the south of severe erosion on travel way B-D.



5. DC-1-7; Coyote Buttes Quad; T41N, R3E, Section 25; view of the junction of travel way C-E



6. DC-1-19; House Rock Springs Quad; T40N, R3E, Section 13; view toward the east of an eroding section of travel way E-E1.

PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 1



7. KC-46-11; Coyote Buttes Quad; T41N, R3E, Section 36; view toward the southwest of ATV tracks on travel way C-E. The route is little used.



8. KC-46-13; Coyote Buttes Quad; T41N, R3E, Section 36; view of travel way E1 off travel way C-E. E1 is abandoned.



9. KC-46-17; Coyote Buttes Quad; T41N, R3E, Section 36; typical eroding tracks in deep sand of travel way G-F-E, the route to a wildlife water catchment (Ladder Reservoir).

PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 2



1. KC-45-21; One Toe Ridge Quad; T40N, R4E, Section 22; view toward west of travel way BB1. The route is largely revegetated and appears abandoned.



2. KC-45-22; One Toe Ridge Quad; T40N, R4E, Section 22; view toward the northeast of the dump at the end of travel way BB1.



3. LB-2-17; One Toe Ridge Quad; T40N, R4E, Section 15; view toward the northeast of travel way C-F-G just north of the gate.



4. LB-2-19; Poverty Flat Quad; T40N, R4E, Section 10 view toward the west of travel way F-A at its junction with travel way C-F-G at F.

PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 3



1. LA-2-12; One Toe Ridge Quad; T40N, R4E, Section 25; view toward the southwest of travel way M1-M2.



2. LA-2-17; One Toe Ridge Quad, T40N, R4E, Section 36; view toward the east of an eroding section of travel way N.



3. LA-2-22; One Toe Ridge Quad, T40N, R5E, Section 30; view toward an eroding section of travel way ZZ.



4. LA-2-24; The Big Knoll Quad, T40N, R5E, Section 24; view toward the east of a little used travel ZZ just south of the Big Knoll.

PARIA CANYON-VERMILION
CLIFFS WILDERNESS ADDITION 3



5. LB-2-15; Poverty Flat Quad; T40N, R5E, Section 7;
view toward the northeast of travel way Z-C.



6. LB-2-16; Poverty Flat Quad; T40N, R5E, Section 8;
view toward the south of travel way Z-C at C (BLM
Route 1087).

VCNM Wilderness Addition 5



1. KC-60-18; Water Pockets Quad, T41N, R6E, Section 3; view toward the southwest of travel way M at its northern junction with travel way N (point M1).



2. KC-60-19; Water Pockets Quad, T41N, R6E, Section 4; view toward northeast of the Paria Canyon-Vermilion Cliffs Wilderness.



3. KC-60-20; Water Pockets Quad, T41N, R6E, Section 10; view toward the northwest of travel way M at its southern junction with travel way N (point M2).



4. KC-60-21; Water Pockets Quad, T41N, R6E, Section 11; view toward the south of travel way O-P at P. Route is very sandy.



5. KC-60-22; Water Pockets Quad, T41N, R6E, Section 13; view toward the southwest of travel way O-P at the junction of a spur travel way to the north.



6. KC-60-24; Water Pockets Quad, T41N, R7E, Section 18; view at the end of cherry stem P-R of the Paria-Vermilion Cliffs Wilderness

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