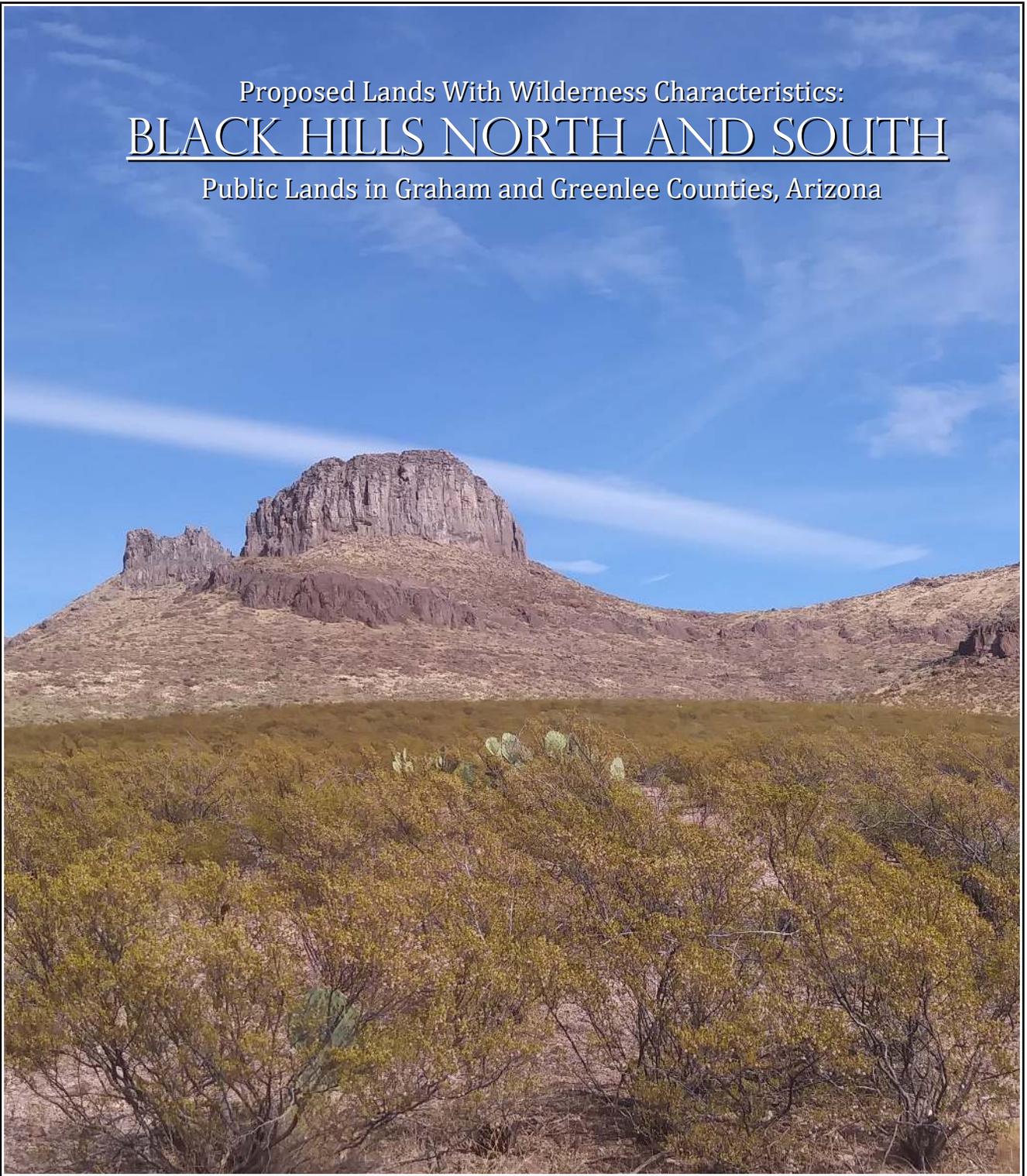


Proposed Lands With Wilderness Characteristics:
BLACK HILLS NORTH AND SOUTH

Public Lands in Graham and Greenlee Counties, Arizona



A proposal report to the Bureau of Land Management,
Safford Field Office, Arizona
November, 2017
Prepared by Samuel Wershow



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Black Hills Proposed LWCs

PREFACE: This Proposal was developed according to BLM Manual 6310

General Overview

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

In March 2012, the Bureau of Land Management issued updated manuals for inventorying and managing Lands with Wilderness Characteristics on public lands (hereafter often referred to as LWC's). These manuals provide the agency with direction for implementing its legal obligations to inventory and consider management of Lands with Wilderness Characteristics, including the Federal Land Policy and Management Act's provision that BLM "preserve and protect certain public lands in their natural condition" (43 U.S.C. § 1701(a)(8)).

Manual 6310 (Conducting Wilderness Characteristics Inventory on BLM Lands) guides the BLM on how to meet its obligations to inventory for and identify lands with wilderness characteristics. Manual 6320 (Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process) guides the BLM on the options available to address lands with wilderness characteristics in land use planning once they have been identified in the required inventory, such as putting management prescriptions in place to protect wilderness characteristics. The purpose of this report is to provide the BLM with recommendations for designation of Lands with Wilderness Characteristics in the Safford Resource Area of southeastern Arizona, based on new, accurate, and up-to-date information according to Manual 6310.²

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

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

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

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

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

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

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

1. Memorandum 2011-154 is available online at:

http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2011/IM_2011-154.html

2. Manual 6310 is available online at :

http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_manual.Par.38337.File.dat/6310.pdf

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

Human impacts – Human impacts must be documented and some are acceptable so long as they are “substantially unnoticeable”; Examples include trails, bridges, fire rings, minor radio repeater sites, air quality monitoring devices, fencing, spring developments, and stock ponds. Outside human impacts – impacts outside the area are generally not considered, but major outside impacts should be noted and evaluated for direct effects on the entire area (the manual explicitly cautions BLM to “avoid an overly strict approach”).

• **Outstanding opportunities for either solitude or primitive and unconfined recreation:**

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

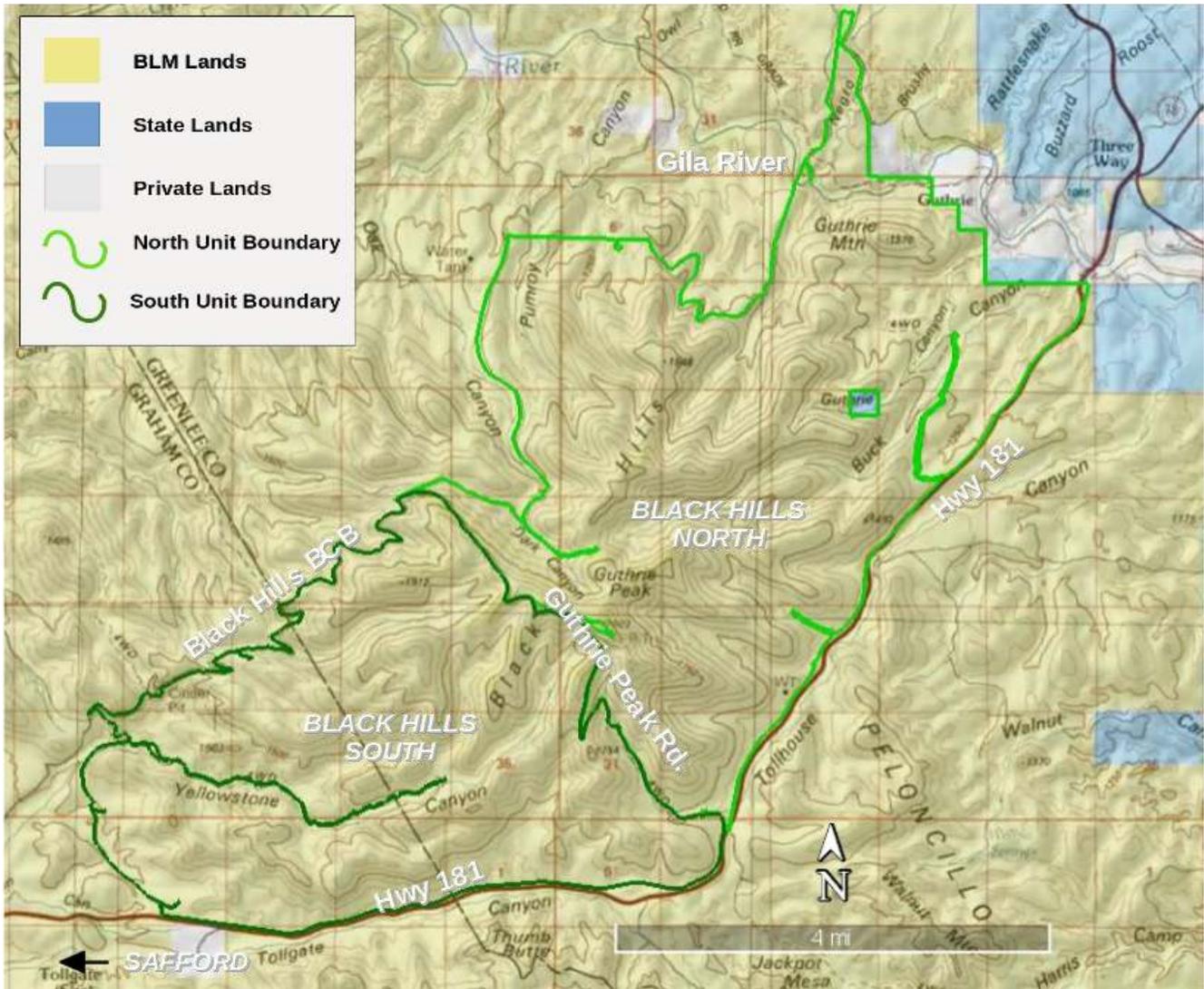
• **Supplemental values:** Ecological, geological, scientific, scenic, educational or historical features should be documented where they exist, although they are not required traits.

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

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

- “Wilderness inventory roads” are routes which have been: (1) improved and maintained (when needed), (2) by mechanical means (but not solely by the passage of vehicles), (3) to insure relatively regular and continuous use.
- “Primitive routes” or “ways” are transportation linear features located within areas that have been identified as having wilderness characteristics and not meeting the wilderness inventory road definition.
- Lands between individual human impacts should not be automatically excluded from the area; no setbacks or buffers allowed; boundaries should be drawn to exclude developed rights-of-way; “undeveloped rights-of-way and similar possessory interests (e.g., as mineral leases) are not treated as impacts to wilderness characteristics because these rights may never be developed”; areas can have wilderness characteristics even though every acre within the area may not meet all the criteria.

Section 1: Unit Summary



Summary Map – The Black Hills proposed LWCs lie about 20 miles ENE of Safford, just south of Clifton/Morenci. They are primarily bounded by and accessed from HWY 191 on the south/east side and by the Black Hills Backcountry Byway (BCB) along the west/north side. This is a well maintained dirt and gravel road that provides recreation access to this scenic area. The Black Hills North and South LWCs are divided by the Guthrie Peak Rd., a rough, single lane 4WD road that climbs to the summit of Guthrie Peak at 6571 feet. This road accesses a cluster of communications towers on the summit.

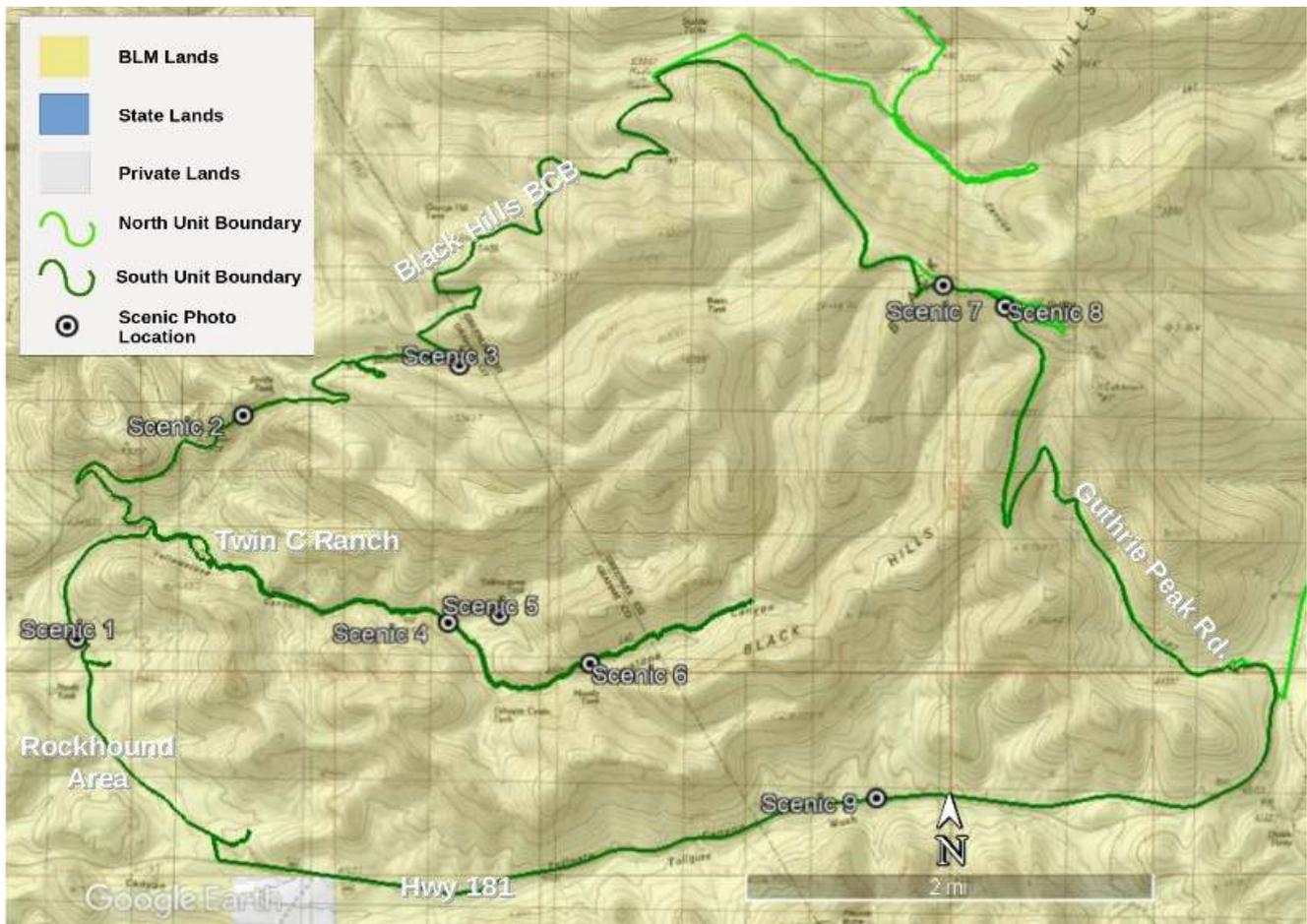
Summary of Wilderness Characteristics: Guthrie Peak defines the rugged topography of both units. A network of canyons and ridges radiate out from the peak in all directions, falling to elevations of about 4000 feet along the perimeter of the units and 3400 feet at the Gila River in the northernmost part of the north unit. Vegetation ranges from Sonoran and Chihuahan desert scrublands of creosote, prickly pear, cholla, and ocotillo into semi-desert grasslands at middle elevations and pinyon, oak, and juniper woodlands on the higher slopes of Guthrie peak. Highlights include Guthrie Peak itself, which provides magnificent panoramic vistas, Yellowstone canyon, an extensive network of canyons and

Black Hills Proposed LWCs

washes through volcanic landforms, and a 1 mile stretch of the Gila River, a lush and vitally important riparian corridor. Both units possess rugged topography, diverse ecosystems, and dramatic volcanic formations.

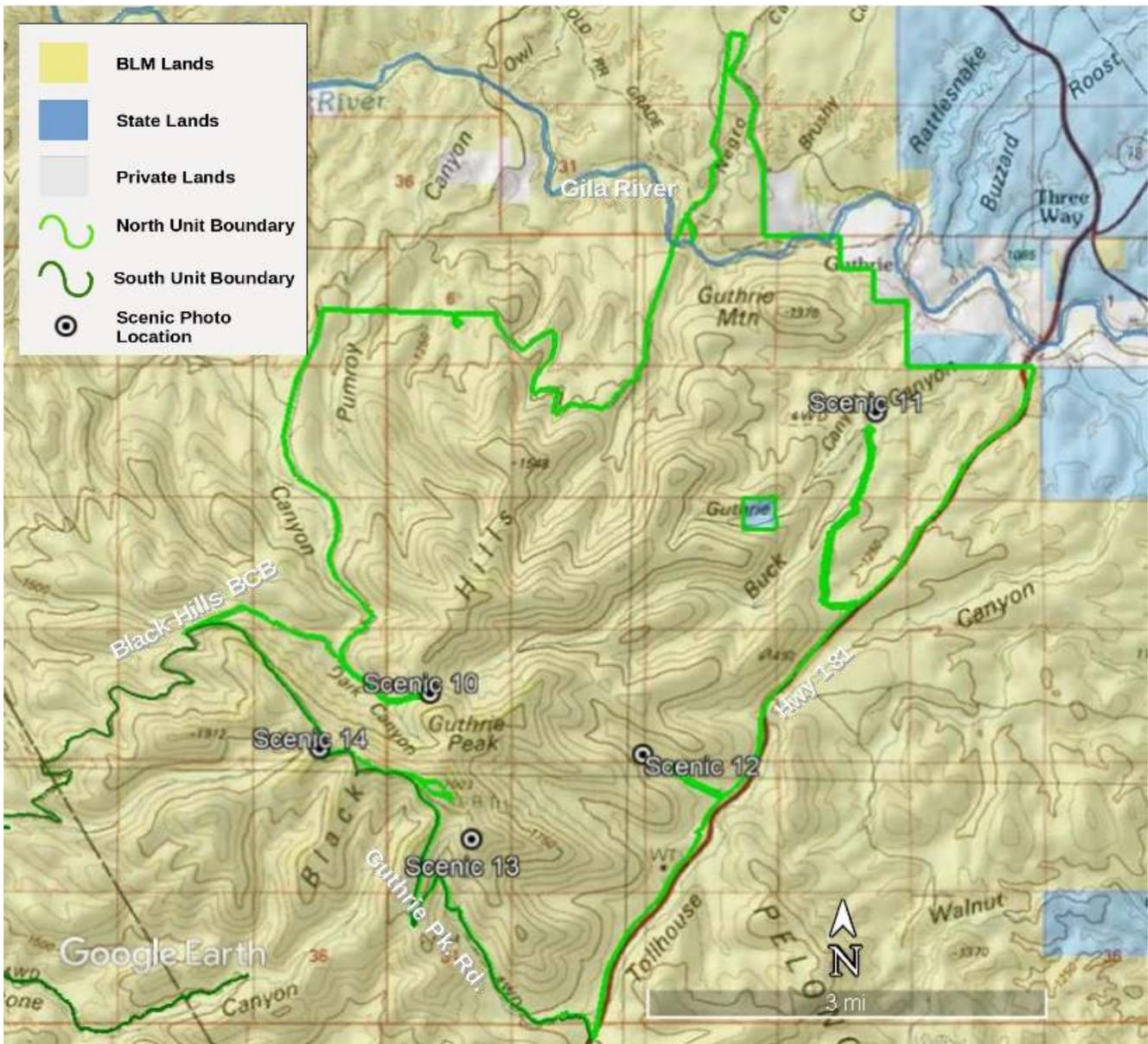
Human impacts throughout the units are minimal. Few wilderness inventory roads penetrate into the unit as cherrystems, and even informal primitive routes are uncommon. The southeastern portion of the South unit is pristine, with essentially no visible human impacts whatsoever. There is some light ranching infrastructure and in both units, centered around the Twin C Ranch in Yellowstone Canyon and Allred Ranch in the Dark Canyon area. This infrastructure is typically hidden in canyons and leaves a light footprint on the land, substantially unnoticeable from the vast majority of the unit and minimally impacting naturalness. Both Black Hills units meet the BLM criteria for Size, Naturalness, and Outstanding Opportunities for Solitude and Primitive and Unconfined Recreation. They are excellent candidates for LWC designation and management for wilderness values.

Scenic Photo Location Maps



Black Hills South Scenic Photos - Map detailing key features and scenic photo locations in the South unit. Scenic photos can be found immediately following these maps. The Rockhound Area is a BLM designated recreation area for collecting agates and other semi-precious stones.

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Black Hills North - Map detailing key features and scenic photo locations in the North unit.

Scenic Photos

The following photos document the naturalness, wilderness characteristics, and potential for solitude and primitive and unconfined recreation present in the units. Photo locations are detailed in the summary maps above. All photos taken by the author during the field survey 11/9-11/12, 2017.

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Scenic Photo 1: Looking east from the southwestern boundary of Black Hills South. Volcanic buttes present outstanding climbing potential and increase the scenic and scientific appeal of the unit. The volcanic history of this area has also made it a haven for rock collectors seeking fire agates and other semi-precious stones. Wide open Sonoran desert terrain is great for hiking or horseback riding.



Scenic Photo 2: Rugged hillsides, Tuff cliff bands, and scenic vistas in the Black Hills South proposed LWC.

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Scenic Photo 3: A lonely, isolated canyon on the western side of Black Hills South. These canyons bear little evidence of human impact and provide outstanding opportunities solitude.



Scenic Photo 4: The extensive network of canyons in the Yellowstone Canyon system, Black Hills South. These canyons provide hiking access deep into the heart of the unit. They harbor a variety of interesting ecosystems and landforms, great opportunities for bird and wildlife viewing, and an isolated wilderness experience.

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Scenic Photo 5: Buttes and cliffs surrounding Yellowstone Canyon. These landforms offer terrific bouldering, scrambling and hiking, in a remote wilderness canyon setting. Ranching impacts here are substantially unnoticeable.

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Scenic Photo 6: View into the upper reaches of Yellowstone Canyon. This spectacular canyon provides an outstanding wilderness experience for hiking, bird watching, hunting, photography, and contemplating nature. Despite light ranching infrastructure (including stock ponds within this field of view), human impacts are substantially unnoticeable – the canyon appears wild and pristine.



Scenic Photo 7: Stunning ridgetop views from the near the Black Hills North/South unit boundary. Higher elevations in the Black Hills exhibit Madrean evergreen woodland vegetation, a locally uncommon community.

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Scenic 8: Ridgetop view into Black Hills south unit. Deep canyons and steep topography create a feeling of isolation and present interesting terrain for recreation.



Scenic Photo 9: Mesas, cliffs, and semi-desert grasslands characteristic of the southern portion of the Black Hills South unit. This part of the unit is pristine, with no discernible human impacts, providing an outstanding wilderness experience.

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Scenic Photo 10: View into a remote canyon from the north side of Guthrie Peak. Semi-desert Grasslands transitioning into Madrean evergreen woodlands.



Scenic Photo 11: Wide open views, rolling hills, and semi-desert grassland plains in the northern part of Black Hills North unit. Nearly all of both units are classified by the Nature Conservancy as “High-quality Native Grasslands”. This community, unique to the southeastern part of Arizona, is increasingly threatened. The Black Hills present one of the states best examples of the semi-desert grassland community.

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Scenic Photo 12: Rich semi-desert grasslands in a scenic canyon in the southeastern portion of Black Hills North.



Scenic Photo 13: Expansive views and scrub oak thickets on the east side of Guthrie Peak, Black Hills North Unit.

Section 2: Documentation of Wilderness Characteristics

As presented in this report, both the Black Hills South and North Proposed LWCs meet the Size, Naturalness and Outstanding Opportunities for Solitude or Primitive Unconfined Recreation criteria laid out in BLM Manual 6310. These units are excellent candidates for LWC designation and management for the protection of wilderness values

Size: The **Black Hills South** Proposed LWC, as presented in Section 1: Unit Summary and Section 3: Description of Unit Boundary, consists of **8,800** contiguous roadless acres under BLM management. **Black Hills North** consists of **12,100** contiguous roadless acres. These acreages do not include several cherrystem Wilderness Inventory Roads or other excluded impacts near the unit boundaries. None of these roads cut through or subdivide either unit. All other routes within the units were found to be Ways that did not meet the definition of Wilderness Inventory Road, documented in Section 3: Description of the Unit Boundary, Routes, and Impacts. Both units exceed the minimum of 5,000 contiguous acres required for an LWC designation under BLM 6310.

Naturalness: Both Black Hills units are governed primarily by the forces of nature, free of substantial human impacts, and appearing to be in a natural condition to the average visitor. The majority of acreage in both units is pristine, with no recognizable impacts whatsoever. Minor evidence of historic and current ranching activity is present in scattered locations in both units. Such impacts include stock ponds, watering troughs, fences, and primitive, unmaintained routes used by horses, off-road vehicles, and cattle. Where present, these impacts are substantially unnoticeable and minimally impact the naturalness of the area. They are rarely visible from more than 100 meters away and are hidden by dense vegetation and rugged topography. Such impacts are allowable impacts under the terms of BLM 6310.³ Similarly, there are several informal primitive routes on the units which do not meet the definition of Wilderness Inventory Roads⁴. These routes and the rationale for classifying them as Ways (here synonymous with “Primitive Routes”), are documented individually in Section 3: Description of the Unit Boundary, Routes and Impacts. They are not being maintained by mechanical means, are abandoned or kept open only by the passage of vehicals, and minimally impact the naturalness of the unit.

3 “Examples of human-made features that may be considered substantially unnoticeable in certain cases are: trails, trail signs, bridges, fire breaks, pit toilets, fisheries enhancement facilities, fire rings, historic properties, archaeological resources, hitching posts, snow gauges, water quantity and quality measuring devices, research monitoring markers and devices, minor radio repeater sites, air quality monitoring devices, fencing, spring developments, barely visible linear disturbances, and stock ponds.” - BLM Manual 6310, Page 6.

4 “The word ‘roadless’ refers to the absence of roads that have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road.”

The BLM will refer to routes that meet the above definition as wilderness inventory roads. Terms in the above definition are subdefined below

- a. **Improved and maintained** – Actions taken physically by people to keep the road open to vehicle traffic. “Improved” does not necessarily mean formal construction. “Maintained” does not necessarily mean annual maintenance.
- b. **Mechanical means** – Use of hand or power machinery or tools.
- c. **Relatively regular and continuous use** – Vehicular use that has occurred and will continue to occur on a relatively regular basis. Examples are: access roads for equipment to maintain a stock water tank or other established water sources; access roads to maintained recreation sites or facilities; or access roads to mining claims.” - BLM 6310, Glossary, Page 11

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Major impacts, such as the Twin C Ranch, and the communications towers on Guthrie Peak, have been excluded from the unit. Generally, BLM 6310 states that impacts outside of the unit should not be considered to detract from naturalness: “Human impacts outside the area will not normally be considered in assessing naturalness of an area. If, however, a major outside impact exists, it should be noted in the overall inventory area description and evaluated for its direct effects on the area.”⁵ In this case, the Twin C Ranch is at the bottom of Yellowstone Canyon. Most of its impacts are very concentrated in a small area, screened by topography and vegetation to the point where they are barely visible from outside their immediate vicinity. Beyond the ranch buildings themselves, the canyon appears to be wild and natural, and despite scattered minor ranching impacts, is one of the most scenic and rugged portions of either unit. The communications towers on Guthrie Peak are visible from many places in either unit, but are a minor presence except on the summit of the peak itself. One can easily have a wilderness experience in the vast majority of either unit without being aware of towers or the rough dirt road that provides access to them.

Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation: Due to their rugged topography, size, geologic and ecological diversity, and natural condition, the proposed LWCs possesses outstanding opportunities for both solitude *and* primitive and unconfined recreation.

Solitude: Both Black Hills potential LWC units contain outstanding opportunities for Solitude. Rugged topography of hills, cliffs, mesas, and canyons are the rule throughout these units, providing the visitor with the feeling that they are deep in wilderness when only a short distance from the unit boundary. Solitude is easily found throughout either unit, especially in the extensive networks of canyons and washes radiating outward from Guthrie Peak. It is easy to travel into these canyons from any part of the unit and soon be out of sight or sound of any sign of human civilization. Visitors would easily be hidden from each other in these remote, serpentine canyons, and lush vegetation in the washes provides additional screening and seclusion. The vast majority of both units are wild and undeveloped, with no established routes or trails, providing ample opportunities to experience wilderness in privacy, peace, and solitude. In general the area is lightly used for any purpose. The landscape is pristine, showing very few signs of human use and almost no trash or litter. During 3 days of extensive surveying, I saw only one other person, a horseback rider, inside the unit boundaries.

Primitive and Unconfined Recreation: The scenic qualities, diversity of landscapes, and rugged topography of the Black Hills provide outstanding opportunities for Primitive and Unconfined Recreation. Hiking the high peaks and ridges provides sweeping vistas of the surrounding countryside, while hiking the many canyons allows for exploration deep into the wilderness, through engaging, varied terrain. Horseback riding and backpacking also have great potential here. Remote cliffs offer intriguing possibilities for rock climbing, and the varied rock formations are great for scrambling and bouldering. A 1 mile reach of the Gila River flows through the Black Hills North unit, providing outstanding canoeing, kayaking, or rafting through a remote and scenic riparian corridor.

There is excellent potential for wildlife viewing or hunting – I encountered a wide variety of non-game and game species including Mule Deer, Javelina, Jackrabbits, Cottontails, Lizards, and sign of Fox and Bobcat. Arizona Game and Fish (AZGF) has classified this area as High Importance for

5 BLM 6310, Pg. 7

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species of economic and recreational importance⁶, indicating that hunting is a major economic activity in this area. Bird watching is excellent. I casually viewed dozens of species while surveying, including Red tailed hawk, Coopers Hawk, Harrier, Kestrel, Western Scrub Jay, Road runner, Canyon Wren, Cactus Wren, Gilded Flicker, Ladder-backed Woodpecker, Black throated sparrow, and numerous others.

Those interested in geology will encounter a variety of dramatic volcanic formations, including cliffs, buttes, and spires composed of Tuffs, Andesites, and Dacites. The Black Hills Rockhound Area is partially within the Black Hills South proposed LWC, allowing for the collection of semi-precious stones on the unit.

Supplemental values: The Black Hills North and South LWCs contain diverse ecosystems with exceptional conservation value.

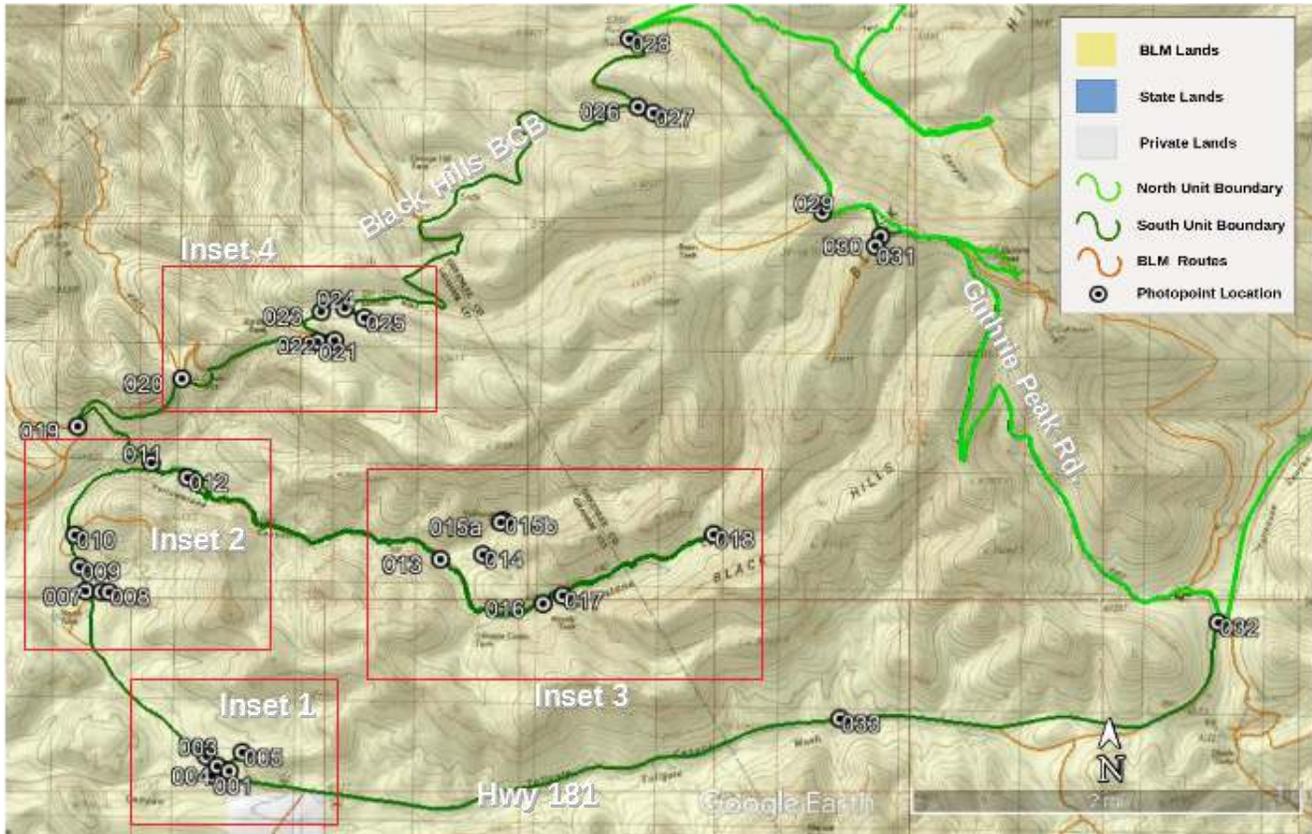
- Three major biotic communities occur in the Black Hills potential LWCs. Semi-desert grassland predominates in the southern unit. This community is fairly unique to the southeastern corner of Arizona. In the northern unit, these grasslands transition to Chihuahan Desert Scrub In the highlands along Guthrie Peak, grasslands transition to Madrean Evergreen Woodlands, a locally uncommon community limited to higher elevations in southeastern Arizona. These habitat islands provide critical links between scattered habitat patches that maintain biodiversity connectivity amongst plant and wildlife populations.
- Nature Conservancy classifies over 90% of the North Unit and 100% of the south unit as “High Quality Native Grasslands.” Native grasslands have experienced significant decline across Arizona, with only 31% of former grasslands reported to be “in good condition”⁷.
- AZGF has classified this area as High Richness in Species of Greatest Conservation Need, based on a richness index of the most vulnerable species in the state⁸.
- The Black Hills North unit includes a 1 mile reach of the Gila River, the major perennial stream in one of Arizona’s largest and most important watersheds. This portion of the Gila River is wild and scenic in character, cutting a meandering path under cliffs and steep banks, with many riffles and pools. The river itself provides critical habitat for dozens of game and non-game fish species, and other aquatic animals. It is also a vital source of water for mammals that inhabit the area. The riparian corridor supports lush a diverse vegetation, providing excellent bird and mammal habitat.

6 Arizona Game and Fish Habimap Tool, accessed online at <http://www.habimap.org/habimap/>

7 The Nature Conservancy, Southwest Grasslands Assessment, accessed online at <http://azconservation.org/projects/grasslands>

8 Arizona Game and Fish Habimap Tool, accessed online at <http://www.habimap.org/habimap/>

Section 3: Description of the Unit Boundary, Routes, and Impacts
Black Hills South Photopoint Maps



South Unit Reference Map - Locations of photopoints along the Black Hills South unit boundary and locations of inset maps that provide additional detail.

Black Hills Proposed LWCs

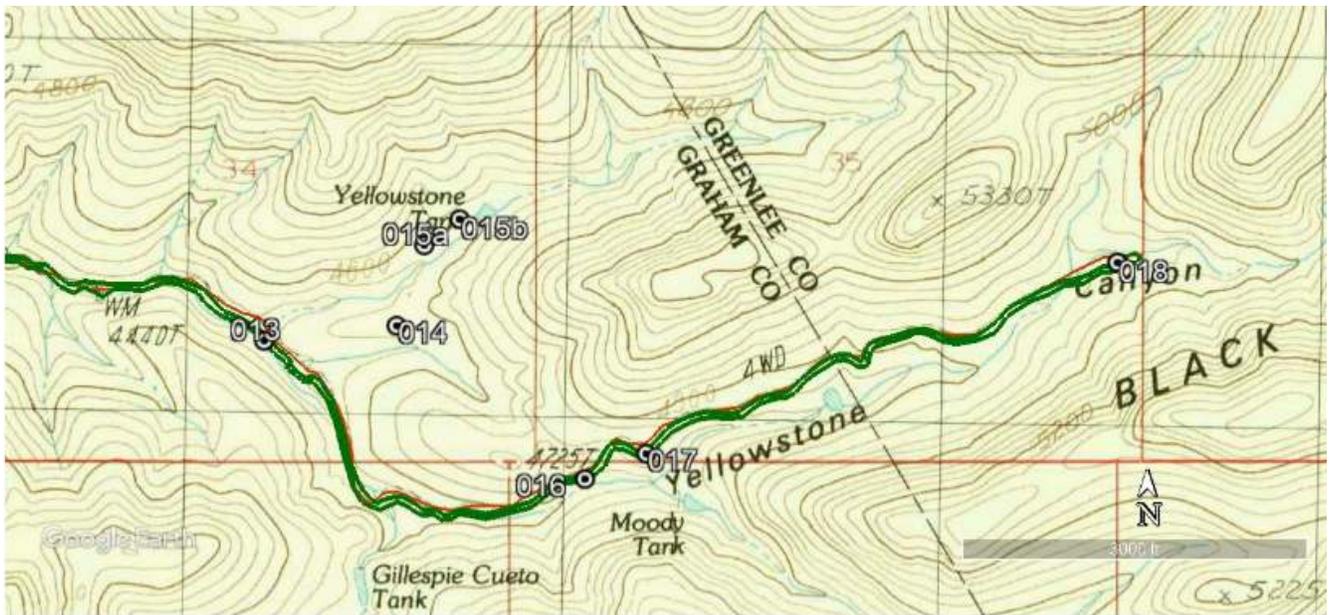


Inset 1 - Photopoint locations in the southwestern corner of the South unit. At 001, the boundary follows the Rockbound area road northwest from Hwy 181.



Inset 2 - Photopoints along the western unit boundary and into the cherrystem road that follows Yellowstone Canyon. The Twin C Ranch is excluded from the unit.

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Inset 3 -Photopoints in upper Yellowstone Canyon, along the cherrystem road. This cherrystem accesses a series of tanks, however the tanks themselves are well screened by topography and vegetation and are substantially unnoticeable. The canyon as a whole appears natural and has tremendous potential for hiking, horseback riding, bird watching and other recreation.



Inset 4 - Photopoints along the Black Hills Backcountry Byway. The Cinder Pit at 020 has been excluded from the unit.

Narrative Description of Proposed LWC Boundary, Vehicle Routes, and Human Impacts – Black Hills South

Summary

The Black Hills South proposed LWC is bounded to the south by US Hwy 191, to the west by the Black Hills Rockhound Area Road, and to the North by the Black Hills Backcountry Byway. The eastern boundary is defined by the Guthrie Peak Road, which also divides the unit from Black Hills North. The boundary and impacts are described clockwise from the southwestern corner of the unit, beginning with point 001.

Western Boundary – Black Hills Rockhound Area Road, 001-019.

- **001** is the junction between Hwy 181 and the Rockhound Area Rd., showing the typical condition of this well maintained dirt/gravel road.
- **002** is a Way, created solely by the passage of vehicles, that branches off to the east before terminating almost immediately.
- **003** is the beginning of a cherrystem east into the unit, providing access to several primitive campsites.
 - **004** is Way branching off to the south of the cherrystem, in the process of revegetation. It shows no signs of maintenance or recent use.
 - **005** is a campsite, excluded from the unit, that marks the end of this cherrystem. Beyond this point there is no discernible route or path.
- **006** is the beginning of a cherrystem, providing access to an excluded campsite at 007, and terminating at a dead end at 008.
- **009** is a ditch, probably dug for drainage purposes. It does not constitute a route of any kind and is substantially unnoticeable from even a short distance away, minimally impacting naturalness.
- **010** is a reclaimed and unused Way heading east a short distance into the unit
- **011** is the junction with the Twin C Ranch Road, providing access to the Twin C Ranch. This is beginning of a long cherrystem following Yellowstone Canyon and providing access to ranching infrastructure such as wells and tanks.
 - **012** is the locked gate at the entrance to the Twin C Ranch. The ranch structures and all major infrastructure are excluded from the unit
 - **013** is a junction with a Way heading east and then north. The main route continues to follow the canyon to the southeast.
 - At **014**, a Way branches off to the east and quickly deteriorates. There are few signs of vehicle use and no evidence of maintenance. The way to the east has no apparent purposes
 - To the north, the Way becomes faint and lightly used, showing no evidence of maintenance (**015a**). The Way terminates at **015b**, a dirt tank/stock pond. This feature is substantially unnoticeable from a short distance away, hidden in a densely vegetated canyon. It minimally impacts the naturalness of this exceptionally scenic portion of the unit.
 - **016** is a junction with a faint, unmaintained Way heading east, across the canyon to a dirt tank/stock pond (**017**). This feature is invisible from most vantage points in the canyon, or on the slopes above, screened by vegetation and topography (**017**). It minimally impacts naturalness.
 - **018** is a water tank and trough, excluded from the unit. This is the end of the cherrystem. Beyond this point the canyon bottom is a natural wash with minimal signs of human impact.

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- **019** is the junction with the Black Hills Backcountry Byway (BCB), and the start of the Northern unit boundary

Northern Boundary – Black Hills BCB, to Guthrie Peak Rd., 019 to 028

- **020** is a short spur road leading to an abandoned open pit cinder mine. The unit boundary follows this road, excluding the mine, and rejoining the Black Hills BCB.
- **021** is a corral and short cherrystem road to a water tank. At **022**, the road becomes a Way, in the process of revegetation and showing no recent signs of use or maintenance.
- **023** is a closed Way that has been blocked by a rock/earth berm. It is not used or maintained beyond this closure point.
- **024** is a short cherrystem road to a maintenance building at **025**, the end of the cherrystem.
- **026** is a short cherrystem to a water tank and trough. The becomes a Way shortly beyond these features, and is almost completely naturalized/reclaimed by **027**.
- **028** is the junction with the Guthrie Peak Road, a rough but maintained 4WD road providing access to communications towers on top of Guthrie Peak.

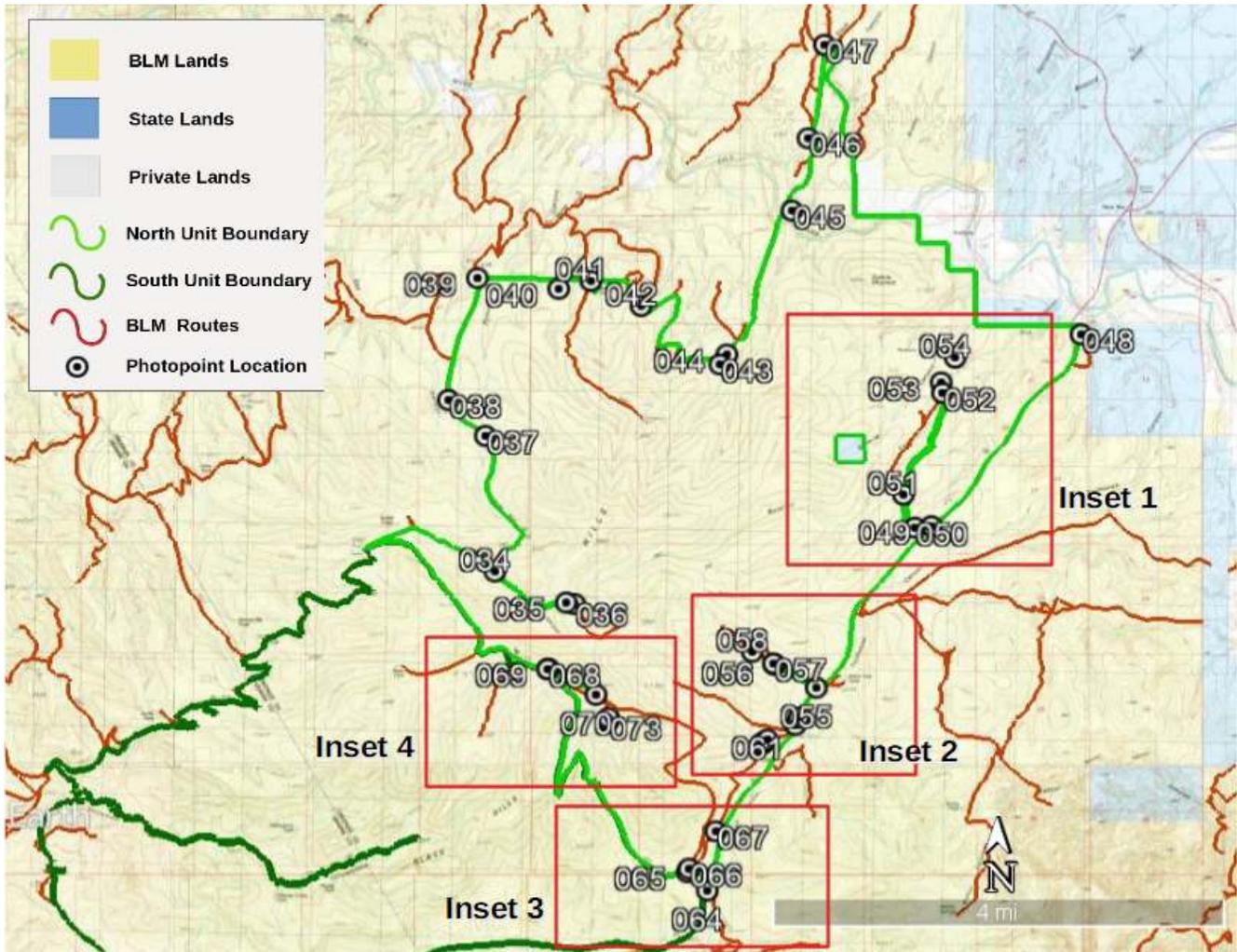
Northeastern Boundary – Guthrie Peak Rd, from the Black Hills BCB to Hwy 181, 028-032

- **029** is a reclaimed and unused Way showing no signs of construction or maintenance.
- **030** is a short cherrystem to a water tank/trough. The route is reclaimed and unused beyond the tank (**031**).
- At **032**, Guthrie Peak Rd. junctions with a gravel road heading south, parallel to US 181. The unit boundary follows this road to its junction with Hwy 181 about ½ mile to the southwest.

Southern Boundary – Hwy 181, from Guthrie Peak Rd. to Black Hills Rockhound Area Rd, 032-001.

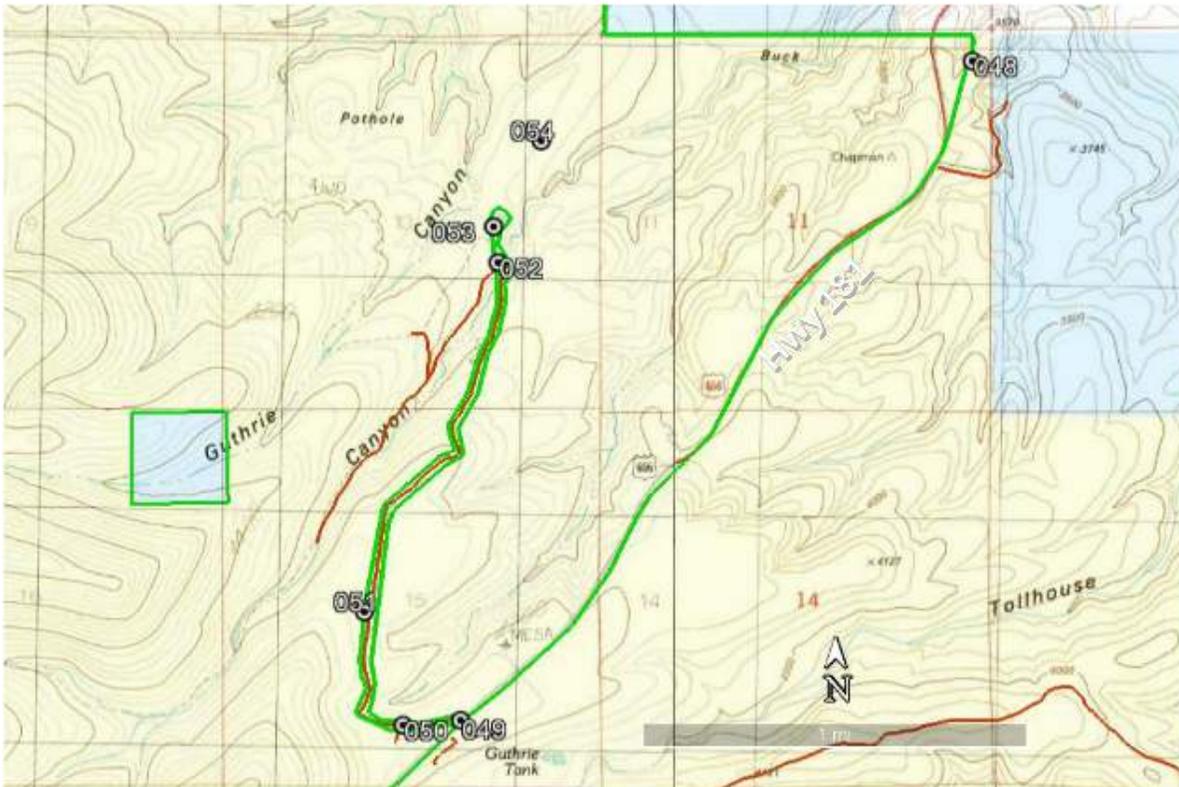
- **033** is a faint Way heading north into the unit. It shows no recent signs of use or maintenance. The southern boundary is otherwise free of any human impacts whatsoever.

Black Hills North Unit Photopoint Maps



North Unit Reference Map - Photopoints along the Black Hills South unit boundary and locations of inset maps that provide additional detail.

Black Hills Proposed LWCs

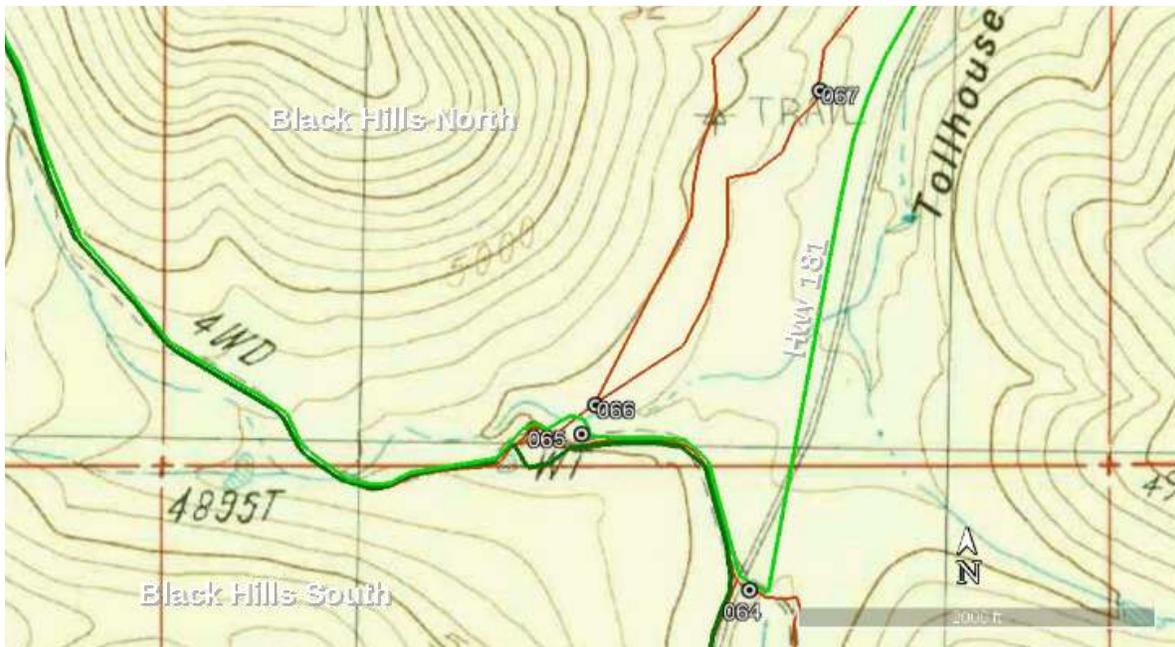


Inset 1 - Photopoints along the eastern unit boundary (Hwy 181).

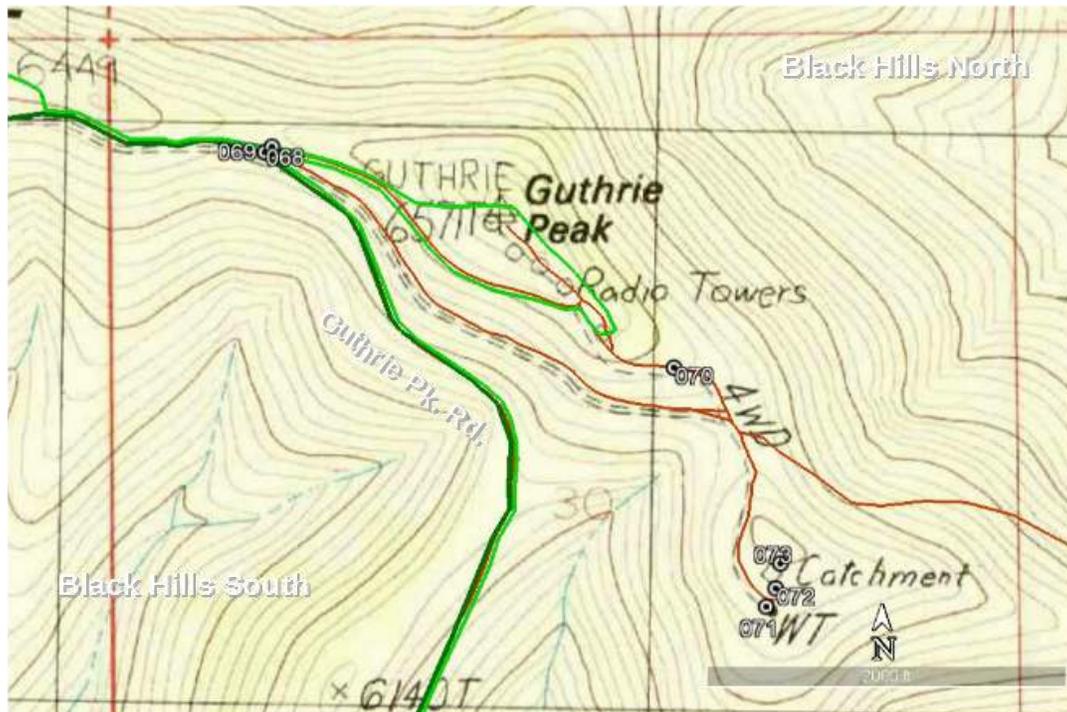


Inset 2 - Photopoints along the southeastern unit boundary, Black Hills North.

Black Hills Proposed LWCs



Inset 3 - Photopoints near the junction of the Guthrie Pk Road, which divides the north and south units, and Hwy 181, the eastern unit boundary



Inset 4 - Photopoint locations around Guthrie Peak

Narrative Description of Proposed LWC Boundary, Vehicle Routes, and Human Impacts – Black Hills North

Summary

The Black Hills North proposed LWC is bounded on the west by the Black Hills Scenic Backcountry Byway, to the north by a network of power lines, access roads, and private property lines, to the east by US Hwy 191, and to the southwest by the Guthrie Peak Road. The boundary description proceeds clockwise from point 028 and the junction of the Black Hills Backcountry Byway and the Guthrie Peak Road.

Western Boundary – Black Hills BCB, 028 to 039

- **028** is the junction of the Black Hills BCB with the Guthrie Pk. Rd., which divides the North and South Units.
- **034** is the junction with the Dark Canyon Road and beginning of a cherrystem. The road leads to two tanks and a trough at **035**, the end of the cherrystem. Beyond this point the route becomes a reclaimed and unused Way, shown at **036**
- **037** is an abandoned tank and trough, partially screened by topography and vegetation. It is substantially unnoticeable and minimally impacts naturalness.
- **038** is an unmaintained, unmarked, and user-created Way heading east into the unit. It shows only light use, is kept open solely by the passage of vehicles, and minimally impacts naturalness.
- At **039** the unit boundary leaves the BCB and follows power lines to the east.

Northern Boundary – Power Lines, Access Roads, and Private/State Property Boundaries, 039 to 048

- **040** is an unmarked Way heading south into the unit. It shows no recent signs of maintenance, deteriorates rapidly, and minimally impacts naturalness.
- At **041** the Mesa Tank Road cherrystems a short distance south into the unit. Beyond the tank, the route quickly deteriorates into a Way, showing no recent signs of maintenance and no apparent purpose.
- At **042** the boundary joins the High Tank Road, continuing to the southeast.
- **043** is a short, decommissioned Way heading south into the unit. It is blocked by an earth berm and revegetated beyond this point.
- **044** is another reclaimed and unused Way heading southeast into the unit. It is heavily vegetated and substantially unnoticeable.
- Just NE of **044**, the unit boundary rejoins the power lines heading northeast across the Gila River.
- **045** is a short cherrystem heading southeast, providing access to the Gila River.
- At the cherrystem, the boundary briefly departs from the powerlines, following the utility access road north, and rejoining the powerlines at **046**.
- At **047**, the unit boundary follows a utility access road east to the railroad tracks. The railroad tracks form the unit boundary for about a mile, eventually hitting a private property boundary to the southeast.
- The unit boundary follows private and then state property lines until **048**, where it meets US Highway 181.

Eastern Boundary – Hwy 181, 048 to 064.

Black Hills Proposed LWCs

- The unit boundary follows Hwy 181 south from **048** to **049**, the beginning of a cherrystem road west and then north into the unit.
 - **050** is a short spur road heading south to an active and maintained corral. Both the road and corral are excluded from the unit.
 - **051** is a junction with a Way heading northwest into the unit. It shows no recent maintenance and is becoming overgrown a short distance beyond its junction with the cherrystem
 - **052** is a faint, unmaintained and lightly used Way to the southwest kept open solely by the passage of vehicles. It is unnoticeable from a short distance away and minimally impacts naturalness.
 - **053** is a maintained tank/trough at the end of the cherrystem. This feature is excluded, and minimally impacts the naturalness of the surrounding area because of topographic and vegetative screening.
 - **054** is a Way heading northeast beyond the tank. It shows no signs of recent maintenance, is kept open solely by the passage of vehicles, and minimally impacts naturalness.
- **055** is the start of a short cherrystem road west into the unit. The cherrystem ends at **056**, where several tanks and a cistern, create a cumulative impact that is excluded from the unit, although they appear to be unused and abandoned. Beyond these impacts, **057** and **058** are both reclaimed and unused Ways showing heavy revegetation.
- **059** is a short cherrystem road to a tank. Beyond the tank, the route quickly deteriorates into an unmaintained Way. **060** shows a Way splitting off to the west. **061** shows a reclaimed and unused Way accessing an abandoned tank and trough (**062 and 063**). These impacts are unused and unmaintained and are becoming overgrown. They are substantially unnoticeable due to vegetative and topographic screening, minimally impacting the naturalness of the area.
- **064** is the junction of HWY 181 with the Guthrie Peak Rd., which forms the southwestern boundary of the North Unit and divides the North and South Units.
- **065** shows a Way through a cluster of abandoned machinery and ranching infrastructure, excluded from the unit due to its cumulative impact. At **066**, the Way becomes faint and substantially unnoticeable, and impacts to naturalness are minimal beyond this point (also see **067**).
- **068** is a junction with an abandoned Way heading southeast between the Guthrie Pk Rd., and the communications towers on the summit.
- **069** is a cherrystem road providing access to the communications towers, which are excluded from the unit.
 - Beyond the towers, the route becomes a Way (**070**), continuing southeast to an abandoned catchment basin and tank (**071 and 072**). These structures are unused and overgrown, minimally impacting the naturalness of the area. There is also an automated weather station at **073**. While this feature is in use, it is unnoticeable from a short distance and can be considered an acceptable impact under BLM 6310.
- The unit boundary continues along the Guthrie Peak Road, northwest to its junction with the Black Hills BCB at point 028.

This concludes the boundary description