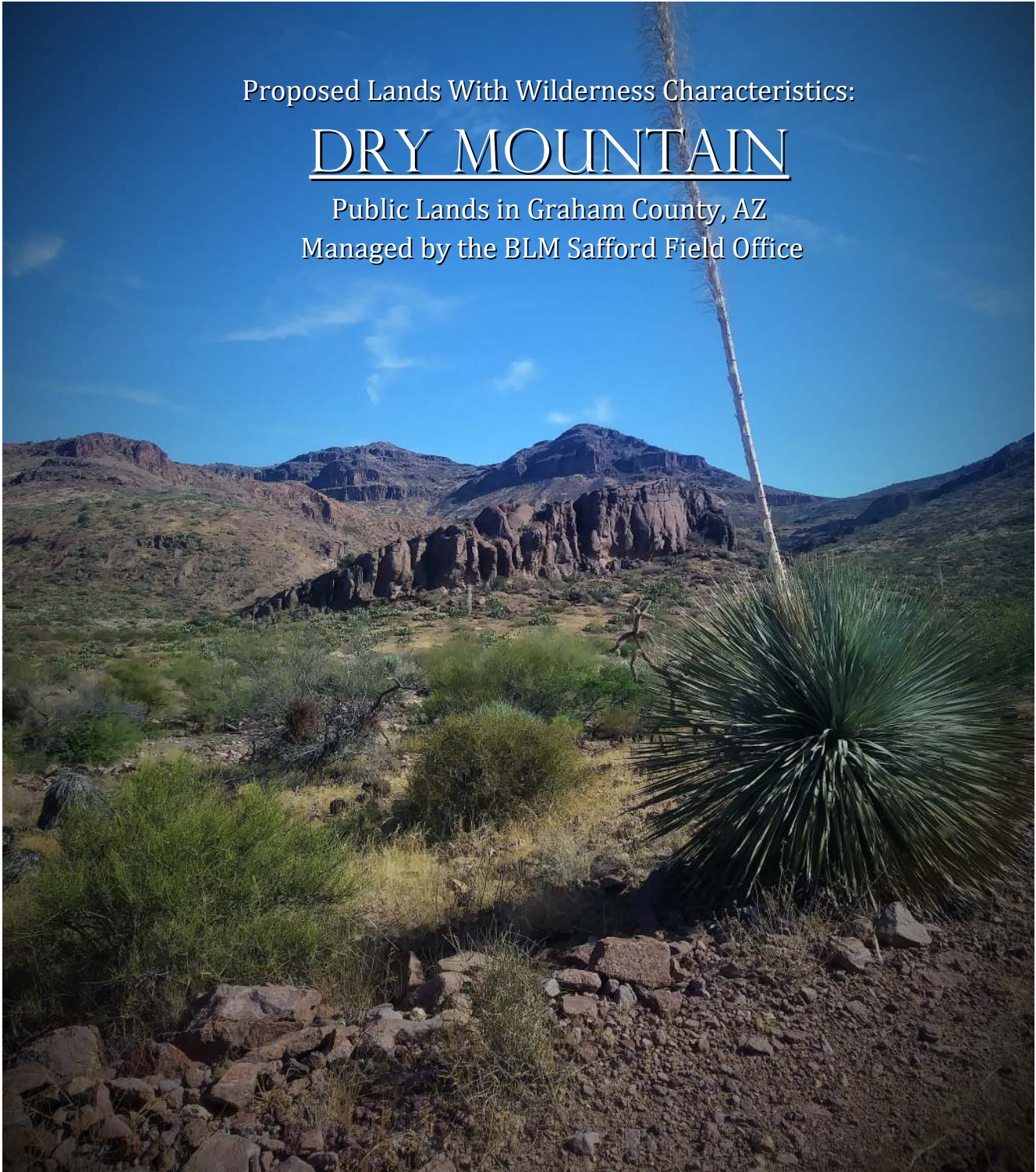


Proposed Lands With Wilderness Characteristics:

DRY MOUNTAIN

Public Lands in Graham County, AZ
Managed by the BLM Safford Field Office



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

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Dry Mountain Proposed LWC

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

Dry Mountain Proposed LWC

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.

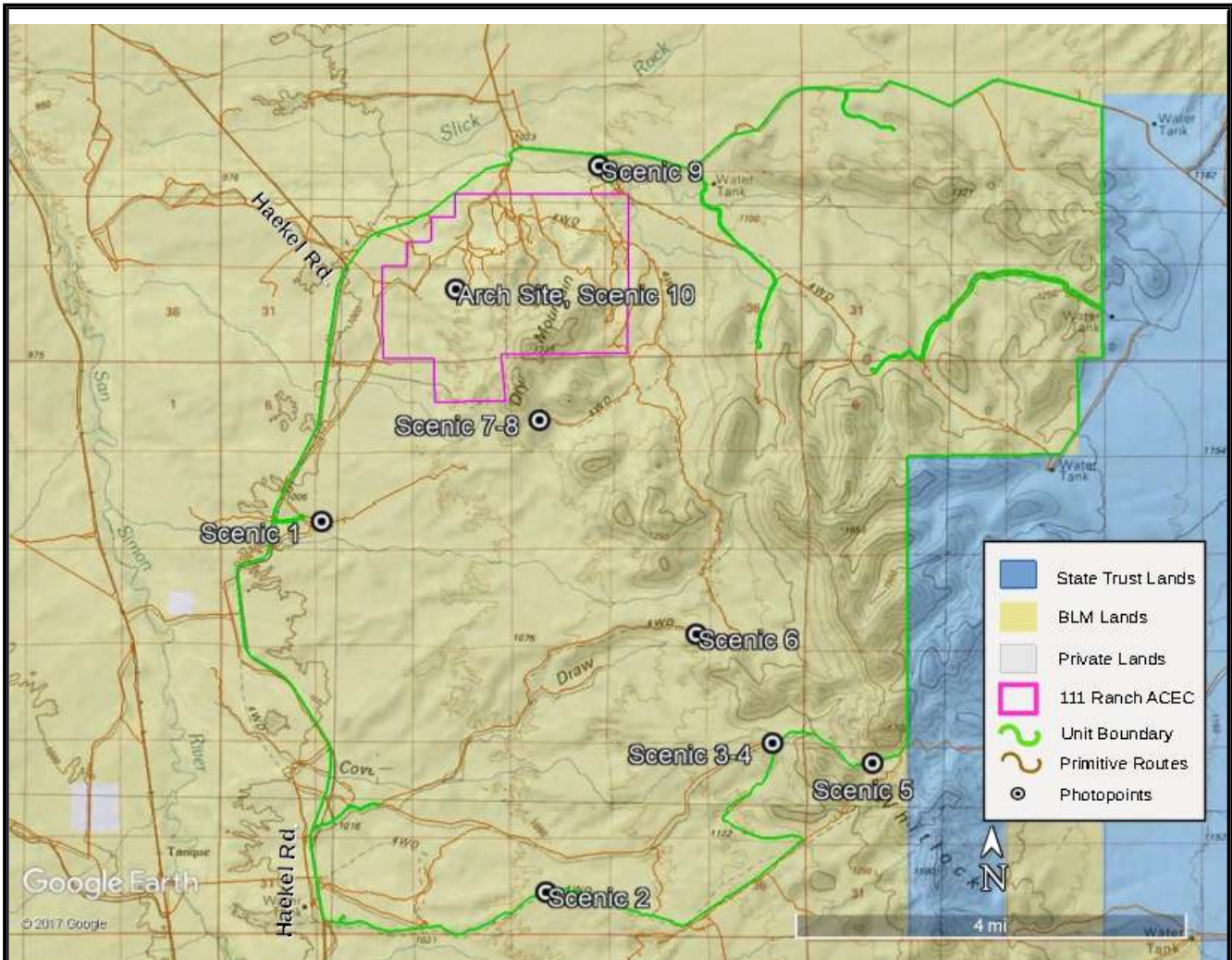
• **Supplemental values:** Ecological, geological, scientific, scenic, educational or historical features should be documented where they exist, although they are not required traits.

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: Overview of Proposed LWC



Summary Map detailing proposed LWC boundary, locations of scenic photos, and the 111 Ranch ACEC

The Dry Mountain proposed LWC consists of 33,600 acres of BLM lands about 16 miles southeast of Safford, AZ. The unit is bounded by the Haekel Road on the west side, unnamed dirt roads on the north and south boundaries, and by State Trust lands along the eastern boundary. Two major cherrystem roads penetrate into the Northeastern portion of the unit. The 111 Ranch Area of Critical Environmental Concern (ACEC) occupies the northwestern part of the unit. This area contains active archaeological/paleontological excavations. The Whitlock Mountains dominate the landscape, stretching across the northern and eastern parts of the unit. The western portion is characterized by extensive wash networks, rolling desert plains, and badlands. Highlights of the unit include the towering basalt cliffs of Dry Mountain and the Whitlocks, isolated canyons radiating outward from the Whitlocks, and impressive badlands topography in the area of the 111 Ranch ACEC. The unit possesses a wide variety of vegetation communities, geologic diversity of sedimentary and volcanic landforms, and abundant wildlife. While there are primitive routes and range impacts scattered throughout the unit, these are either abandoned and reclaimed or substantially unnoticeable, and thus allowable under an LWC designation. The Dry Mountain proposed LWC is affected primarily by the forces of nature and possesses outstanding opportunities for both solitude and primitive and unconfined recreation.

Dry Mountain Proposed LWC

Scenic Photos

These photos document the naturalness, wilderness characteristics, and potential for solitude and primitive and unconfined recreation present in the unit. Photo locations are detailed in the summary map above. All photos taken by the authors during the field survey 10/13-10/16, 2017.



Scenic Photo 1: Whitlock Mountains at sunset. Photo is looking east from the western unit boundary on the soaring cliffs and volcanic landforms of the Whitlocks Mtns. The Whitlocks provide outstanding opportunities for hiking, climbing, hunting, and wildlife viewing in exceptionally challenging terrain. The wide open desert plains of the unit's lower elevations allow for unimpeded vistas over the landscape, imparting a feeling of solitude and inviting unconfined exploration.

Dry Mountain Proposed LWC



Scenic Photo 2: View into the Whitlock Mtns from the southern unit boundary.



Scenic photo 3: Isolated buttes and canyons of the Whitlock Mtns. from the southeastern unit boundary.

Dry Mountain Proposed LWC



Scenic photo 4: View into the heart of the Whitlock Mtns from the SE unit boundary. Note towering basalt cliffs in mid ground with excellent climbing potential.



Scenic photo 5: Remote, isolated canyons in the southeastern portion of the unit.

Dry Mountain Proposed LWC



Scenic photo 6: High cliffs of the Whitlocks, looking northeast from the heart of the unit.



Scenic photo 7: Volcanic formations and desert terrain near Dry Mountain in the northern part of the unit.

Dry Mountain Proposed LWC



Scenic photo 8: Isolated canyon cutting through volcanic tuff formations near Dry Mountain.



Scenic photo 9: Looking south at Dry Mountain and badlands topography in the mid-ground.

Dry Mountain Proposed LWC



Scenic photo 10: Badlands sedimentary formations in the 111 Ranch ACEC.

Documentation of Wilderness Characteristics

As presented in this report, the Dry Mountain Proposed LWC meets the Size, Naturalness and Outstanding Opportunities for Solitude or Primitive Unconfined Recreation criteria laid out in BLM Manual 6310. This unit is an excellent candidate for LWC designation and management for the protection of wilderness values

Size: The Dry Mountain Proposed LWC, as presented in Section 1: Unit Summary and Section 3: Description of Unit Boundary, consists of 33,600 contiguous roadless acres under BLM management. This acreage does not include several cherrystem Wilderness Inventory Roads or other excluded impacts near the unit boundary. None of these roads cut through or subdivide the unit. This acreage easily exceeds the minimum criterion of 5,000 acres set forth in BLM 6310. All other routes within the unit 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.

Naturalness: The proposed unit is affected primarily by the forces of nature. The vast majority of the acreage is free of any human impacts and appears to be in a natural condition. Where present, human impacts are substantially unnoticeable. Such impacts include abandoned ranching infrastructure like corrals and troughs that are no longer used or maintained and are in the process of reclamation. Some features, such as stock ponds, earthen dams, and fences, are still functional and in use, but are hidden by vegetation or topography. They minimally impact the naturalness of the unit and are allowable

Dry Mountain Proposed LWC

impacts under the terms of BLM 6310.³ Similarly, there are dozens of informal primitive routes on the unit 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 vehicles, and minimally impact the naturalness of the unit.

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

- **Solitude:** The 33,600 acres of rugged mountains, remote canyons, rolling plains, and extensive washes provide ample opportunity for a visitor to experience wilderness in a secluded setting far from the sights and sounds of other humans (see scenic photos 2,3,6, and 7). Topography and vegetation both screen a visitor from other potential visitors and from the minor human impacts present in the unit. There are dozens of canyons in the northern and eastern portions of the unit, especially in the Whitlock Mtns. (see scenic photos 4, 5, and 8), providing an isolated wilderness experience. Some of these canyons have nearly 1,000 feet of vertical relief between the canyon bottom and peaks and ridges above. In most cases a visitor would not be able to see outside of the LWC from within the canyons. In the extensive wash systems of the western part of the unit, topographic relief, combined with screening from the lush mesquite and acacia growing there, provide the visitor with isolation and solitude. The badlands topography around Dry Mountain in the northwestern portion of the unit (see scenic photos 9 and 10) is a maze of gullies and bluffs, terrain which enables a visitor to easily find solitude and experience wilderness.
- **Primitive and Unconfined Recreation:** The proposed unit possesses diverse landscapes that offer a variety of outstanding recreation opportunities. The high peaks and deep canyons present challenging terrain for hikers, backpackers, and horseback riders to explore, while basalt cliffs and other volcanic rock formations are suitable for rock climbing and bouldering. The peaks and ridges of the Whitlock Mountains provide sweeping vistas of surrounding valleys and the Gila, Peloncillo, Pinaleno, Chiracahua, and Dos Cabezas mountain ranges. Diverse habitats

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

Dry Mountain Proposed LWC

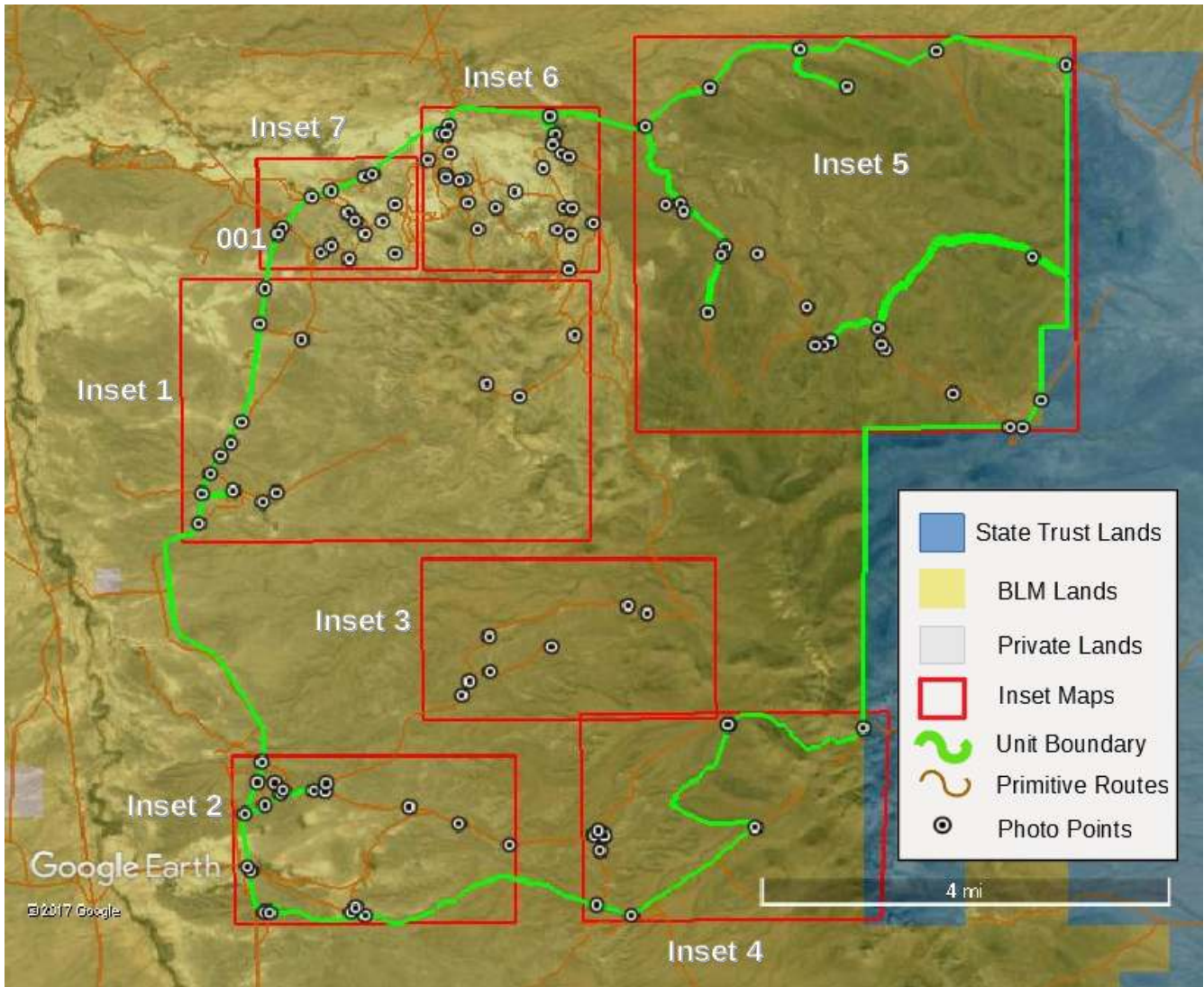
harbor abundant wildlife; we observed dozens of species of birds, reptiles, and mammals during our three day survey. Hunters will find excellent opportunities for a variety of game species such as mule deer, javelina, rabbit, quail, and dove, all of which were observed multiple times during our survey. Bird watchers will also find outstanding opportunities here; we observed Red Tail hawk, Peregrine falcon, Kestrel, Coopers hawk, Road Runner, several species of wren, woodpecker, dove, and sparrow, Raven and Western Scrub jay, Gambel's quail, and many others. Anyone interested in the study, photography or observation of nature will find many interesting subjects within this unit. The range of elevations and microenvironments allow for a wide variety of plant communities to coexist here. Lower elevation flat lands are characterized by classic Sonoran desert vegetation such as creosote, cholla, prickly pear, barrel cactus and saltbush. Sandy washes harbor mesquite and acacia. Intermediate elevations have chaparral communities including several species of oaks and grasses, and higher elevations harbor pinyon pine and juniper woodlands. The unit also displays an interesting variety of geologic formations. There are basalt cliffs and buttes, andesites, tuffs, and other volcanic flows, and bizarre sedimentary badlands.

Supplemental values: The proposed LWC possesses supplemental scientific, educational and cultural values that enhance the wilderness experience for the visitor. The diverse geologic landforms of the unit, including basalt, andesite, tuff, and sedimentary deposits present a valuable resource for education. The badlands on the north and west sides of Dry Mountain are an outstanding example of a unique landform. These deposits also are rich in fossils, and are currently under study and excavation in the 111 Ranch Area of Critical Environmental Concern. This area is in need of greater protection, as it is threatened by a number of informal, user-created off-road vehicle routes.

The unit also possesses a wealth of biological diversity. Arizona Game and Fish (AZGF) recognize three different major biotic communities – Semi-desert grassland, Sonoran Desertscrub, and Chihuahan Desertscrub⁵. Steep elevation gradients create a mosaic of microhabitats, allowing for exceptional plant diversity. These habitats in turn harbor diverse and abundant animal populations, representing a valuable educational, ecological, and economic resource. The majority of the unit is classified as “high importance” under AZGF’s Species of Recreation and Economic Importance model. Most of the unit is classified as Moderate to High on AZGF’s Species of Greatest Conservation Need index. Finally, abandoned ranching infrastructure dating to the early 20th century provides an opportunity to investigate the history and cultural heritage of this region.

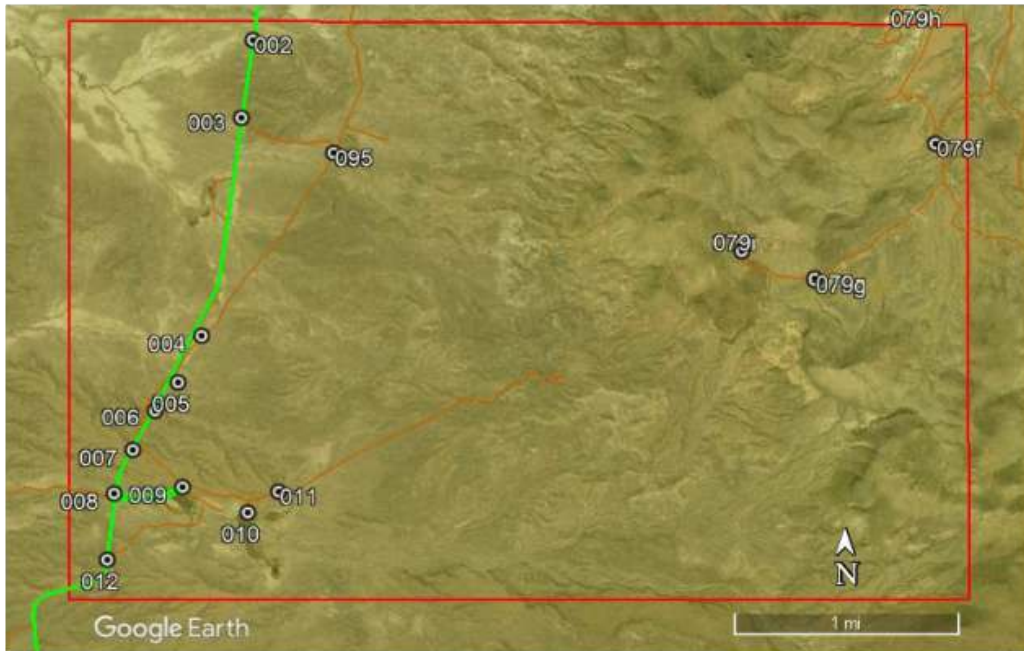
5 AZGF spatial data were obtained through the Habimap tool, available online at <http://www.habimap.org/habimap/>

Section 3: Description of the Unit Boundary, Routes, and Impacts

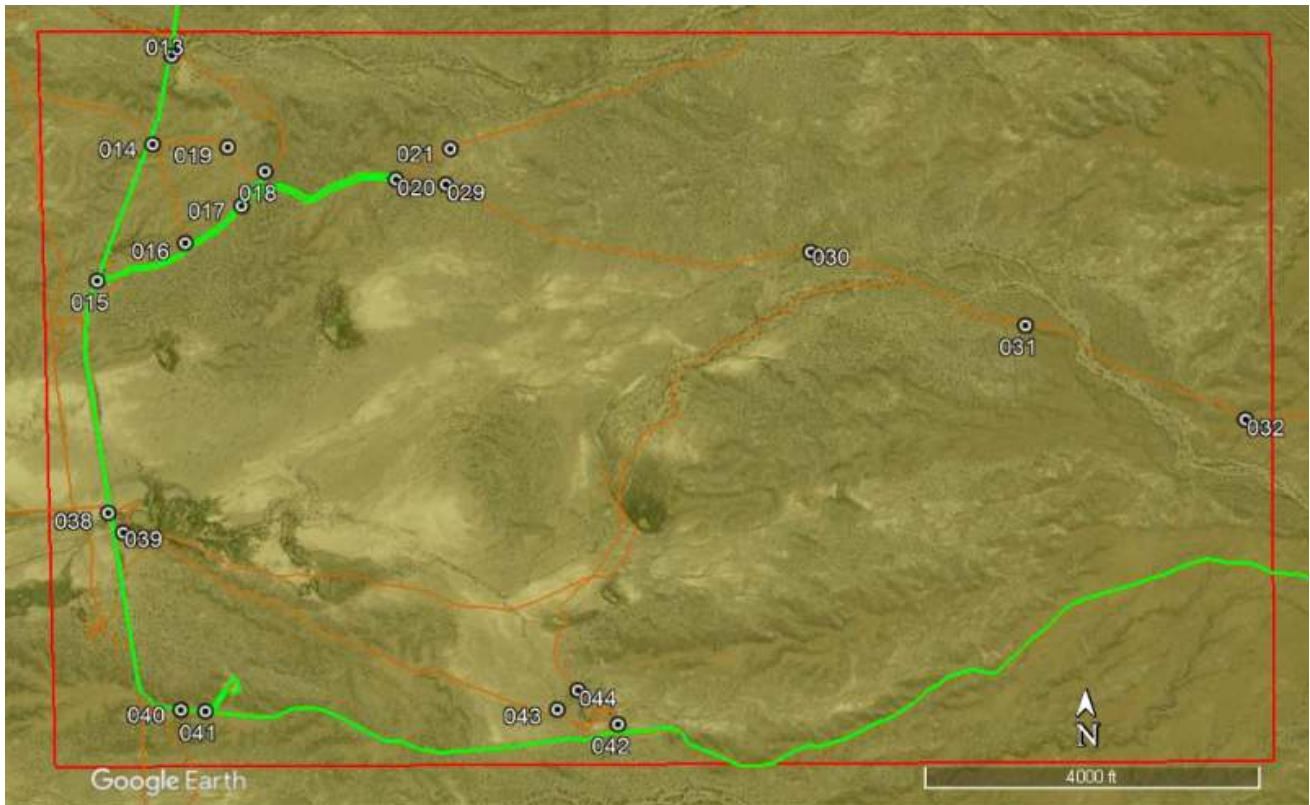


Inset reference map - This map shows the locations of inset maps detailing individual photopoint locations throughout the unit. The unit boundary description begins at point 001 and continues south along the western boundary (Haekel Road).

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Inset 1 - Photopoint locations along the western boundary of the unit

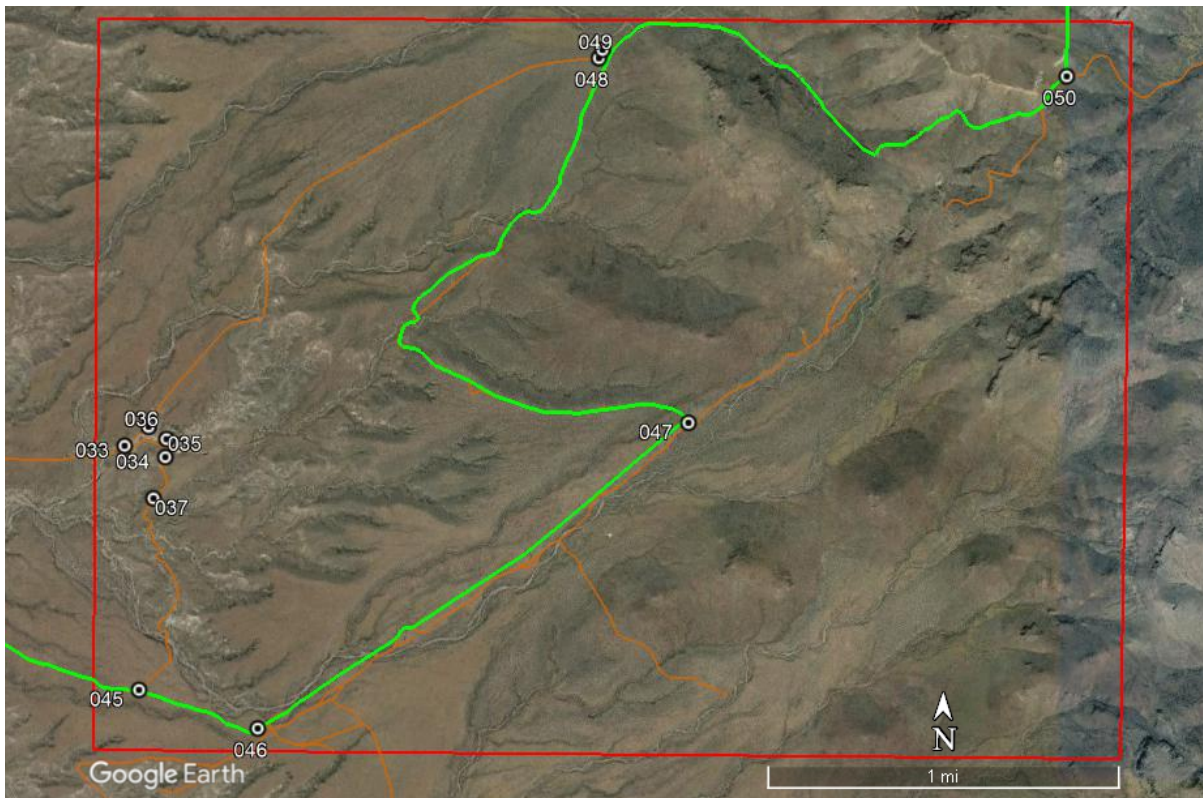


Inset 2 - Details photopoint locations in the southwest corner of the unit

Dry Mountain Proposed LWC

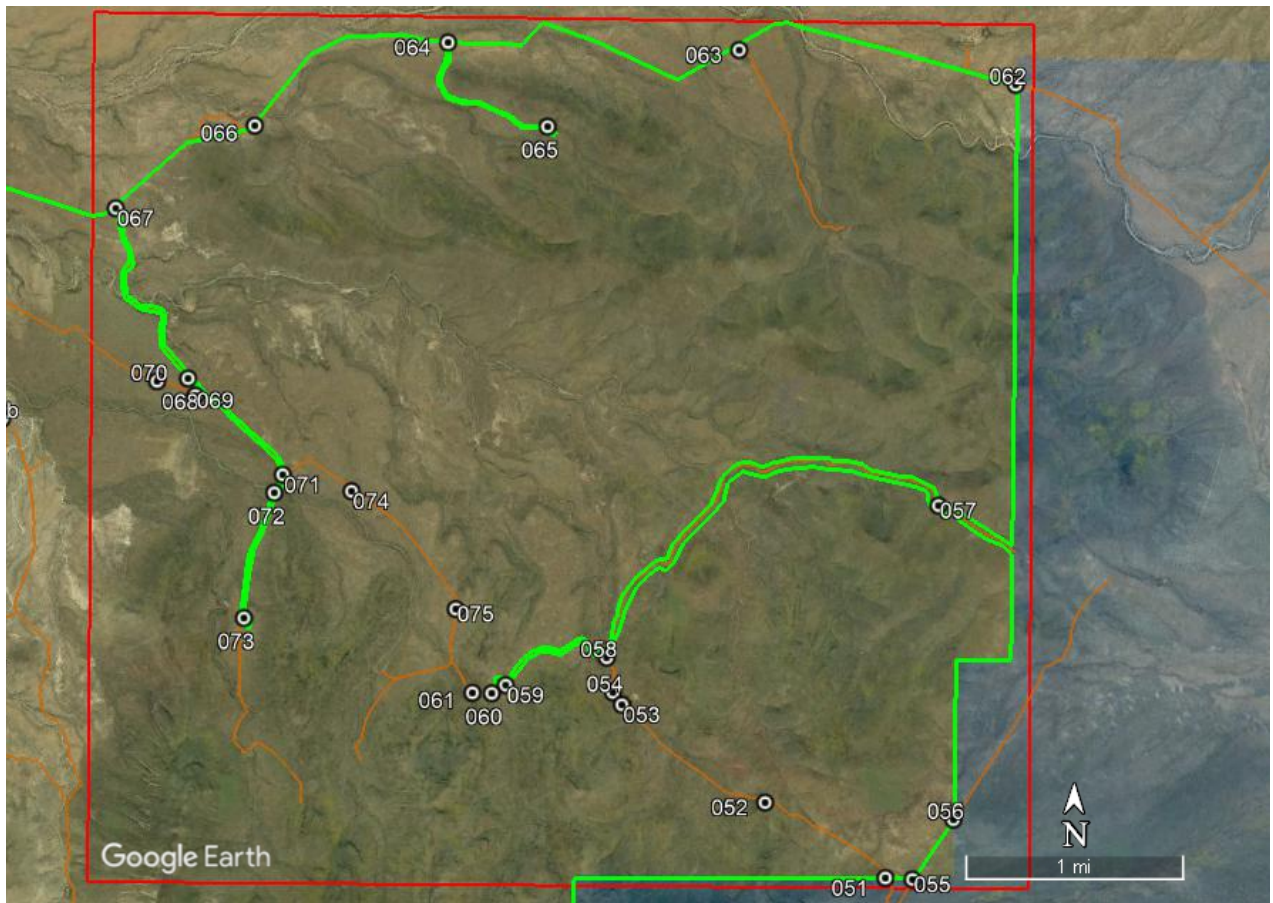


Inset 3 - Photopoint locations in the south/central portion of the unit, accessed from the west.



Inset 4 - Photopoint locations along southeast unit boundary.

Dry Mountain Proposed LWC



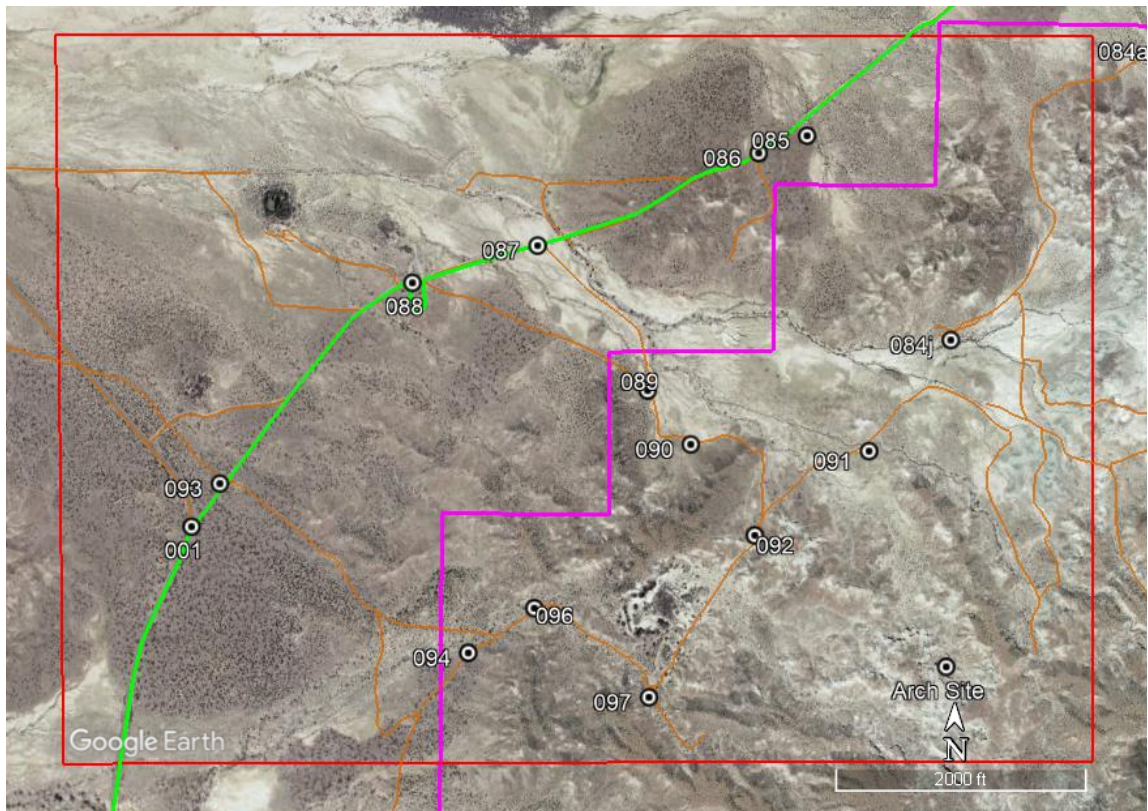
Inset 5 - Photopoint locations and cherrystems in the northeast portion of the unit. State Trust lands boundary along the east side.

Dry Mountain Proposed LWC



Inset 6 - Photopoint locations near Dry Mountain along the north unit boundary, including part of the 111 ranch ACEC.

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Inset 7 - Photopoint locations in the northwest portion of the unit, including part of the 111 Ranch ACEC.

Narrative Description of Proposed LWC Boundary, Vehicle Routes, and Human Impacts

Summary

The Dry Mountain proposed LWC is bounded on the west side by the Haekel Road, on the south by an unnamed dirt 4WD road, on the southeast by a power transmission line and associated maintenance road, on the east by the BLM/State Trust property boundary, and on the north by a unnamed dirt road.

Western Boundary – Haekel Road; 001-040

The proposed western unit boundary is delineated by a segment of the paved Haekel road, from point **001** south to **040**. The BLM route inventory shows several routes heading into the unit, nearly all of which were shown to be unmaintained, user-created Ways or simply natural washes. There are two short cherrystems into the unit from the western boundary, at points **008** and **015**.

- **001** shows the typical condition of the Haekel road south along the unit boundary.
- **002** shows tire tracks heading SE into the unit into a natural wash. It is a user created route kept open only by the passage of vehicles and does not affect naturalness.
- **003** shows a way heading SE into the unit that has been completely revegetated, showing no signs of use or maintenance and substantially unnoticeable to the average visitor.
- **004** is a reclaimed, unused route heading NE into the unit, that is substantially unnoticeable and minimally affects naturalness.
- **005** is a reclaimed, unused route heading SE into the unit, that is substantially unnoticeable and minimally affects naturalness.

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- **006** is a reclaimed, unused route heading SE into the unit, that is substantially unnoticeable and minimally affects naturalness.
- **007** is a user created route showing no evidence of construction, recent use, or maintenance, kept open solely by the passage of vehicles. It minimally affects naturalness.
- **008** is a cherrystem road heading east to a stock pond. While the road does not show evidence of construction or maintenance, it is heavily used and likely to be maintained if needed. The cherry stem ends at a stock pond, beyond which the routes show minimal use and maintenance (see points **009**, **010**). **010** is an earthen dam used to divert and capture water for livestock. It has been revegetated, is substantially unnoticeable to the average visitor, and minimally affects naturalness. This is listed as an acceptable impact according to BLM 6310.
 - Beyond the earth dam, **011** is a heavily eroded and revegetated way, showing no signs of maintenance or recent use.
- **012** shows a natural drainage that was misclassified as a way in the BLM route inventory layer. It shows no signs of maintenance, construction, or vehicle use.
- **013** shows a closure point where an earth berm has been constructed to block a route. Beyond the berm, the route appears to be a natural wash. It shows no signs of construction, maintenance, or use.
- **014** is a Way heading east into the unit kept open solely by the passage of vehicles. It shows no evidence of construction or maintenance, is lightly used, and minimally affects the naturalness of the area.
- **015** is the beginning of a cherrystem heading NE into the unit. There is a revegetated Way heading NW into the unit at **016**. The cherrystem road forks at **017**, with the NW route heading a short distance to a campsite. The route quickly deteriorates to the north, disappearing into a wash at **018** and ending at a user created turnaround at **019**. The cherrystem road continues east from the junction to a junction of two ways at **020**.
 - The northeast route becomes faintly used and heavily eroded in places (**021** and **022**), before hitting another junction at **023**. To the north, the Way continues to degrade, showing few signs of use or maintenance (see **024** and **025**), before arriving at a wildlife water catchment at **026**. This feature is substantially unnoticeable from 50 meters away and minimally affects the naturalness of this rugged and scenic part of the unit. Heading east from **023**, the Way is faint and unmaintained (**027**), ending at a dilapidated, abandoned corral, well, and tank at **028**.
 - Southeast from **020**, the Way becomes heavily eroded (**029**), and soon enters a natural wash showing no signs of recent use (**030**). The route continues east after leaving the wash, showing no signs of maintenance and becoming increasingly faint through points **031** and **032**. The route splits as it approaches an old dirt tank, becoming impassable in both directions due to heavy erosion and lack of maintenance (**033** and **034**). The dirt tank itself is unused and unmaintained. The earth berm that would dam the tank is completely blown out and has not been repaired (**035**). The entire area is in disrepair and has been abandoned for a long time (**036**). It has become overgrown with vegetation and does not impact the naturalness of the area. The route heading south from the tank (**037**) shows no signs of maintenance or recent use and is in the process of revegetating.
- **038** is a way created solely by the passage of vehicles, heading toward a dirt tank. It is not constructed by mechanical means or maintained and minimally affects the naturalness of the area.
- **039** is a reclaimed, unused route to a dirt tank. It is revegetated, showing no signs of recent use or maintenance.

Southern Unit Boundary – Unnamed Dirt Road; 040-046, Power Lines; 046-050

The southern unit boundary begins at the junction of the Haeckel Road and an unnamed dirt road (040), heading east to junction with the power lines and maintenance road that establish the southeastern unit boundary (046). The boundary then follows the powerlines northeast, intersecting the BLM/State Trust property boundary at 050.

Dry Mountain Proposed LWC

- **040** shows the beginning of the southern unit boundary road, heading east.
- **041** is a short cherrystem heading north about 200 meters to a gravel pit (excluded).
- **042** is a reclaimed route heading north towards an old dirt tank. It shows no signs of recent use or maintenance. Beyond the dirt tank, there are several old routes (**043, 044**), that show no signs of recent use or maintenance and are becoming revegetated and reclaimed.
- **045** is a reclaimed and unused route heading northeast. The route is revegetated and substantially unnoticeable.
- The road continues to the junction with the powerline maintenance road at point **046**.
- The powerlines become the southeastern part of the unit boundary until point **047**, where a road routes to the northwest away from the powerlines. **048** is a way heading west into the unit. It has been revegetated and shows no signs of use or maintenance.
- **049** is an abandoned corral and water tank. This feature is unused and unmaintained, overgrown with vegetation and substantially unnoticeable from a short distance away. It minimally detracts from the naturalness of the unit.
- The road intersects the eastern unit boundary, formed by state trust property line, at point **050**.

Eastern Unit Boundary – BLM/State Trust Property Boundary; 050-062

The eastern boundary of the unit is formed by the state trust property land from point 050 north to point 062.

- **051** is a Way heading NW into the unit towards a wildlife water catchment station. The route is faint, revegetated, lightly used, and shows no obvious signs of maintenance or construction (**052, 053**). The route disappears entirely at **054**.
- At **055** the unit boundary briefly departs from the BLM/State Trust property line, following a dirt road to **056**.
- **057** is the beginning of a cherrystem road heading to a wildlife water catchment station maintained by AZFG. The road shows semi-recent signs of use and maintenance (**058**), on the way to the catchment station, which appears fairly new and is in working order (**059**). Beyond **059**, the route quickly degrades, becoming rough, faint, and lightly used. In places the route disappears and is in the process of revegetation (**060** and **061**).
- From **057**, the unit boundary continues north along BLM/State trust property line to **062** at a wide dirt road.

Northern Unit Boundary – Unnamed Dirt Road; 062-001

The northern unit boundary follows an unnamed but well maintained dirt/gravel road from **062** west to the junction with the Haeckel Road at **001**. See point **066** for typical condition of route.

- **063** is a way heading south into the unit that shows no signs of use or maintenance and revegetating.
- **064** is the beginning of a cherrystem heading south to a AZFG wildlife water catchment station, excluded from the unit (see **065**).
- **067** is the beginning of a cherrystem road heading south into the unit to a livestock watering station. The cherrystem continues through **068**, to a junction with a Way heading west at **069**. This route quickly degrades and is unused and reclaimed by point **070**. At point **071** there is a junction, with the cherrystem road continuing south. The route is rough and unmaintained (see **072**), but provides the only access to a metal cistern and watering station (**073**) that is obviously being used and maintained. The road is likely to be maintained if needed. Beyond the cistern the road disappears and the route is unnavigable.
 - East of the junction at **071**, the route quickly degrades and shows minimal use or maintenance (**074**), becoming completely overgrown and very faint by **075**. It is classified as a Way beyond 071.

Dry Mountain Proposed LWC

- **076** is the beginning of a cherrystem heading south into an impacted area. While this road may have originally been used to access a large tank and earth berm (**077**), the berm is blown out and unrepaired and the area has become naturalized and revegetated to the point of being substantially unnoticeable. The route no longer serves any obvious purpose, and degrades beyond the cherrystem end at point **078**.
 - Heading west and then south from **078**, the route becomes a faint, lightly used way defined mostly by natural washes. By **079**, the Way is substantially unnoticeable and shows no obvious signs of construction, maintenance, or use. Beyond **079**, a number of faint routes branch out from the main route. All of these were determined to be Ways, showing no evidence of significant use or maintenance (points **079a-g**).
 - Route **079d** heads toward a dried out and unmaintained dirt tank at **079h**. This feature is substantially unnoticeable and minimally impacts naturalness. **079f** and **079g** head to an old abandoned rock dam in a scenic canyon (**079i**). The dams are unmaintained and barely visible from a short distance away, substantially unnoticeable to the average visitor.
 - Heading southeast from **078**, the route forks at **080**, but quickly degrades in both directions. The route heading north from **080** is a faint, lightly used alternate route back to the cherrystem, while the route heading southeast is reclaimed and unused beyond the wash crossing at **081**.
- At **082**, there is a Way heading south into the unit. The eastern route immediately enters a natural wash, showing little to no signs of vehicle use (**083**), and is eventually cut off by a fence line (**084**). The route to the west quickly degrades and becomes impassable due to erosion at **085**. This route shows no signs of use or maintenance beyond this point.
 - Further south of these routes, there is a spider web of informal routes and washes that show faint signs of use. All of these routes were determined to be unmaintained Ways, kept open only by the passage of vehicles. They do not substantially detract from the naturalness of the area, and many are in the process of revegetation. These routes are documented at points **084a-j**.
 - This area includes unique badlands topography and the 111 Ranch RNA ACEC, a site with active excavations (**see Archaeological Site**). This contributes to the wilderness character of the unit by providing an opportunity for scientific inquiry, and is set in dramatic badlands topography. This area is in urgent need of protection, and would be well served by an LWC designation.
- **085** is a lightly used Way heading south a short distance into the unit with no obvious purpose. It appears to be solely kept open by the passage of vehicles.
- **086** is a natural wash, previously recorded as a route, showing no signs of construction, use, or maintenance.
- **087** is a faint, user-created Way, kept open solely by the passage of vehicles. It does not detract from the areas naturalness and is substantially unnoticeable.
- **088** is a cistern, well, and solar powered pump that is in working order. This impact is right along the unit boundary and should be excluded from the unit. Beyond **088**, there is a faint, user created Way heading into the unit (**089, 090**). This route branches but quickly degrades, becoming impassable to the east at point **091**, and becoming heavily eroded and unused to the south at point **092**.
- **093** is the beginning of a Way heading southeast into the unit. While it shows significant 4WD vehicle use close to the unit boundary, it serves no apparent purpose and branches of into a series of user created Ways that do not lead to any used infrastructure. These routes show little to no evidence of maintenance and do not significantly impact the naturalness of the unit. At **094** the route continues to the south and gradually becomes faint, disappearing completely beyond a crude gate at point **095**. Heading east from **094**, the route disappears into a series of natural washes at **096** and **097**.
- At 001 the northern boundary road joins the Haekel Road, completing the Dry Mountain proposed LWC unit boundary.

Dry Mountain Proposed LWC