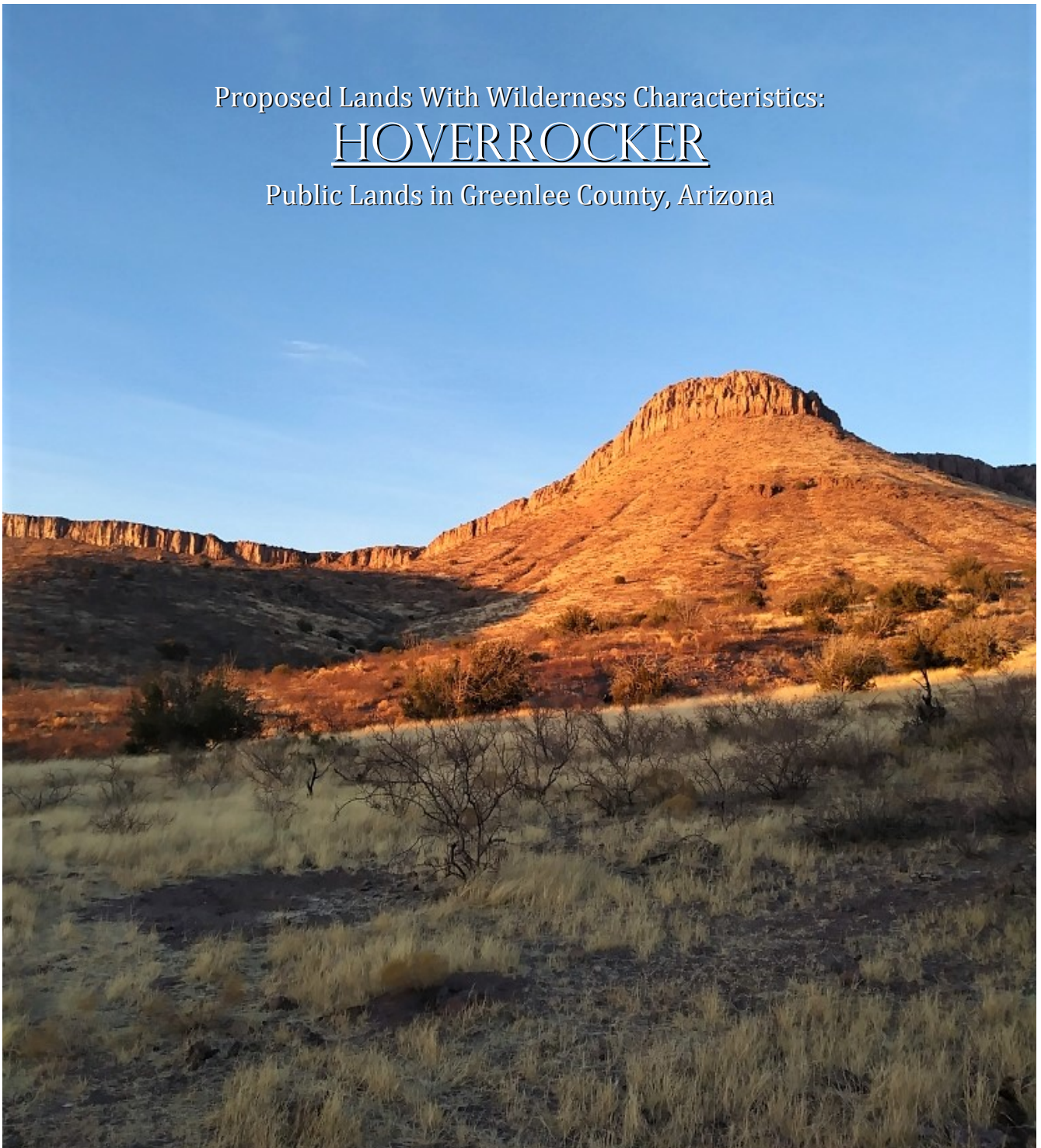


Proposed Lands With Wilderness Characteristics:

HOVERROCKER

Public Lands in Greenlee County, Arizona



A proposal report to the Bureau of Land Management,
Safford Field Office, Arizona
February, 2018
Prepared by Samuel Wershow



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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.

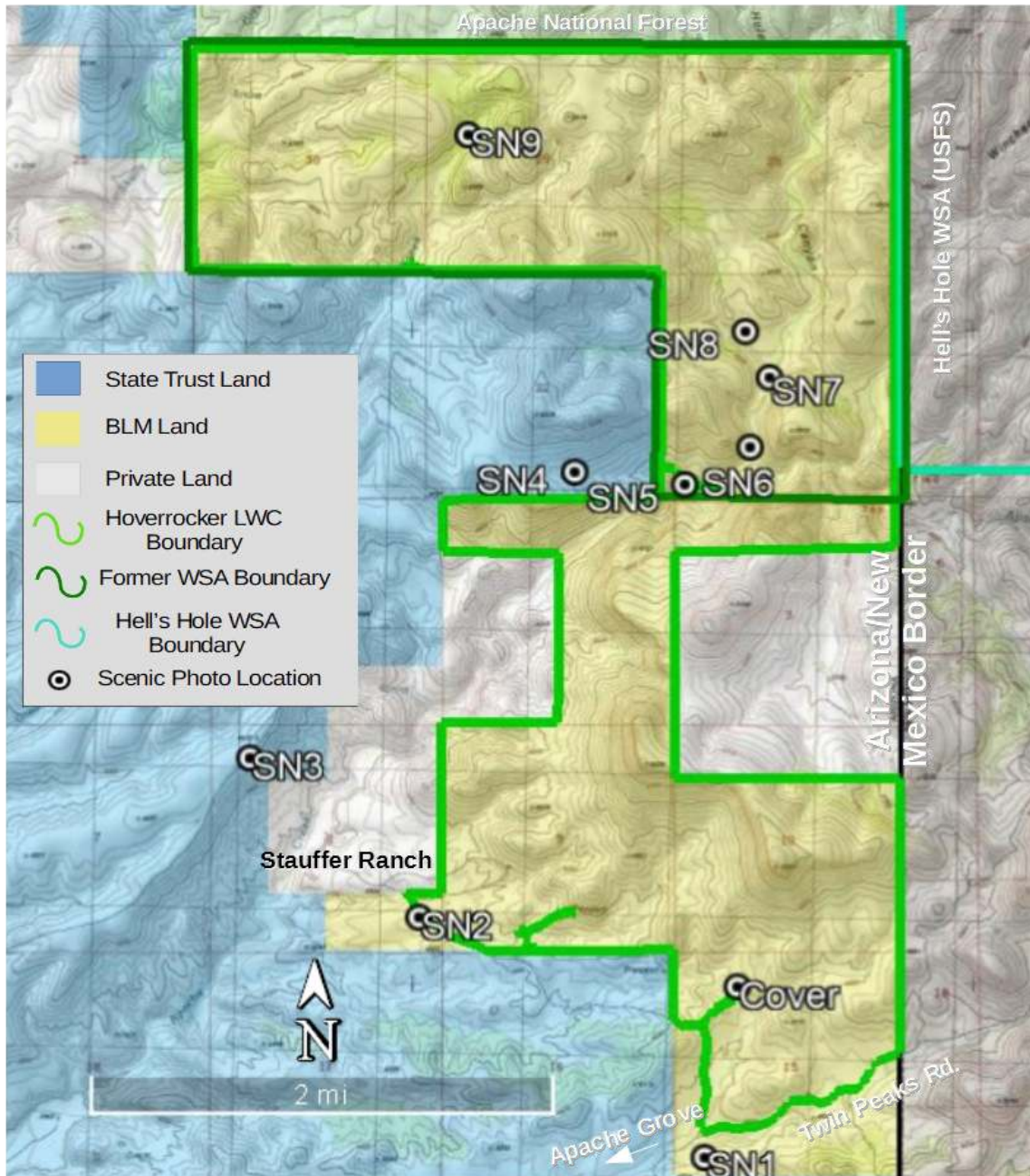
• **Supplemental values:** Ecological, geological, scientific, scenic, educational or historical features should be documented where they exist, although they are not required traits.

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: Overview of the Proposed LWC



Hoverrocker Summary Map - The proposed Hoverrocker LWC encompasses about 4,600 acres of BLM land, contiguous with the Hells Hole Wilderness Study Area (WSA) to the east. The unit is bounded by the Apache National Forest to the north, Gila National Forest to the east, by the Twin Peaks and Stauffer Ranch roads to the south, and by state and private lands to the west. The LWC includes the former Hoverrocker WSA, which has already been documented by the BLM as possessing outstanding opportunities for solitude and primitive and unconfined recreation. The remainder of the unit has similarly outstanding wilderness characteristics. This is remote country, bordered mostly by undeveloped public lands. It is a landscape of buttes, mesas, and deep canyons, harboring a wide spectrum of biodiversity and creating excellent opportunities for hiking, hunting, and other forms of primitive recreation in a wilderness setting.

Section 2: Documentation of Wilderness Characteristics

As presented in this report, the Hoverrocker 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.

History of Wilderness Status: In 1987, the BLM produced an Environmental Impact Statement (EIS) evaluating the suitability of wilderness designation for 15 WSAs in the Phoenix and Safford management districts, including the 2,791 acre Hoverrocker WSA³. This WSA was contiguous with the current Hell’s Hole WSA (managed by the U.S. Forest Service), and is wholly encompassed within the 4,600 acre proposed Hoverrocker LWC. While the Hoverrocker WSA was eventually released from wilderness review in 1990, the BLM has documented the outstanding wilderness characteristics of this unit. According to the EIS “The WSA’s 2,791 acres are generally in natural condition. Human imprints include a masonry dam, two developed springs, three corrals and six miles of boundary fences. The impact to naturalness from these facilities is minimal.” Thus, this acreage, which meets the LWC size criterion as contiguous to the Hells Hole WSA, also was found to meet the naturalness criterion. The EIS further notes “The rolling terrain, numerous drainages and vegetation combined offer outstanding opportunities for solitude” and “opportunities exist for a wide variety of primitive recreation – backpacking, hiking, horseback riding, hunting, bird-watching, photography, and sightseeing.”⁴ Based on these criteria alone, the entire proposed unit meets LWC criteria. However, the remaining acreage possesses similarly outstanding and unique wilderness characteristics in its own right.

Size: The Hoverrocker Proposed LWC consists of **4,663** contiguous roadless acres. However, the entire eastern unit boundary, formed by the Arizona/New Mexico border, is contiguous with the U.S. Forest Service Hell’s Hole Wilderness Study Area. BLM 6310 states that the size criterion is met if the proposed LWC lands “are contiguous with lands which have been formally determined to have wilderness or potential wilderness values, or any Federal lands managed for the protection of wilderness characteristics,” including USFS WSAs⁵. Because no road or human impact divides the proposed LWC from the existing WSA, the lands are contiguous and the size criterion is met.

Naturalness: The proposed LWC is governed primarily by the forces of nature, free of substantial human impacts, and appearing to be in a natural condition to the average visitor. Abundant native vegetation and wildlife define the visitor experience – imparting a feeling of wild, untrammled, nature. This is a landscape of buttes and canyons, with a variety of representative vegetation communities. Highlands are dotted with juniper woodlands, slopes are covered with characteristic Sonoran desert scrub and semi-desert grasslands, and canyon bottoms have riparian vegetation including sycamore and cottonwood.

3 Information on the original Hoverrocker WSA was obtained from the Arizona Mohave Wilderness Designation: Environmental Impact Statement, released in June 1987 and available online at: https://books.google.com/books?id=EPYxAQAAMAAJ&pg=PA120&lpg=PA120&dq=hoverrocker+wsa&source=bl&ots=2C_PJ6B253&sig=LndwIGymU5mZAC3q9QB2G9AQenU&hl=en&sa=X&ved=0ahUKewjg0liAjbrZAhVM3WMKHc88BKAQ6AEIMzAC#v=onepage&q=hoverrocker%20wsa&f=false

4 Description of wilderness values can be found in the Arizona Mohave Wilderness Designation: Environmental Impact Statement, Pg. 120

5 BLM 6310, Page 5.

Hoverrocker Proposed LWC

The BLM's 1980 report on the proposed Hoverrocker WSA states: "The WSA's 2,791 acres are generally in natural condition. Human imprints include a masonry dam, two developed springs, three corrals and six miles of boundary fences. The impact to naturalness from these facilities is minimal."⁶ For the past thirty years nature has continued to reclaim these minor impacts, rendering them almost invisible. Minor evidence of historic and current ranching and mining is present in a few scattered locations elsewhere in the unit. There are abandoned mine prospects at photopoints 012 and 016, and abandoned corrals at 024 and 030. These impacts are substantially unnoticeable and minimally impact the naturalness of the area. They are allowable impacts under the terms of BLM 6310.⁷ Similarly, there are several informal primitive routes (see photopoints 004, 015, 023 and 028) which do not meet the definition of Wilderness Inventory Roads⁸. 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.

The proposed LWC is remote – over 7 miles from the nearest paved road and the tiny communities of the York Valley. Light and noise pollution are minimal. To the north and east there is more wilderness in the Apache and Gila National Forests. No human impacts outside of the unit's boundaries affect its naturalness.

Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation

In the Hoverrocker proposed LWC, rugged topography, dramatic scenic vistas, and a wild, remote character create outstanding opportunities for both solitude *and* primitive and unconfined recreation.

Solitude

Simply accessing the Hoverrocker unit is likely to be an experience in solitude. Tucked against the New Mexico border, miles from the tiny communities of the York Valley, the proposed LWC is primarily accessed via the Bitter Creek Road, just south of Apache Grove. The western unit boundary is a mixture of private ranching lands and state trust lands, the vast majority of which are undeveloped. To the east and north is National Forest land, much of which is currently managed as wilderness. As a result, a visitor to the Hoverrocker LWC is ensconced in a vast, wild, natural area, orders of magnitude larger than the acreage of the LWC itself. From most vantage points, nothing but wilderness is visible, as no human created boundaries separate the LWC from surrounding public lands.

Inside the unit itself, deep canyons and wooded slopes create ample topographic and vegetative screening. Hell's Hole Canyon and Apache Creek cut straight through the heart of the northern half of the unit, in places 500 feet below the surrounding peaks. Several side canyons feed into the main canyon, each inviting exploration and providing ample opportunity to be alone. In the northwestern portion of the unit, the Cottonwood and Skully Creek drainages provide additional solitude. On the

6 Arizona Mohave Wilderness Designation: Environmental Impact Statement, Pg. 120

7 "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.

8 For definition of Wilderness Inventory Roads, see BLM 6310, Pg. 11-12

Hoverrocker Proposed LWC

slopes and mesas above the canyons, juniper woodlands create vegetative screening, while steep topography shields visitors from the sights and sounds of civilization. The southern portion of the unit is dominated by a pair of 5500 foot unnamed peaks. The west sides of these peaks are steep, broken terrain, composed of many ridges and imposing cliffs. A hiker exploring these densely vegetated slopes would be unlikely to see any signs of other people.

Primitive and Unconfined Recreation

Hiking, camping, wildlife viewing, birding, hunting, horseback riding, and climbing opportunities are all outstanding within the boundaries of the proposed LWC. The unit has exceptional topographic relief with canyon bottom elevations around 4200ft and numerous peaks at 5000-5500ft or higher. Canyons and buttes each provide unique and challenging terrain for hikers to explore. The Hell's Hole Canyon/Apache Creek system also has several springs, and can be linked to canyon systems in the nearby Apache National Forest or Hell's Hole WSA to create longer backpacking trips. The southern part of the unit is dominated by twin 5500 ft buttes with 400 ft cliff bands on their south and west sides. Traditional rock climbers could pioneer dozens of new routes up these cliffs. The tops of these buttes provide staggering panoramic views of the surrounding landscape.

Supplemental values:

The Hoverrocker proposed LWC has sensitive archaeological, cultural, and historic sites that would be protected by management for wilderness values.

The Arizona Mohave Wilderness EIS identified 4 prehistoric and 2 historic sites within the boundaries of the former Hoverrocker WSA. Furthermore, the report recognized that limited inventory work had been done and that “the potential is good for other historic and prehistoric sites to be present.”⁹ Managing this area as wilderness will protect these resources from human impacts and support the investigation of new sites.

The Hoverrocker proposed LWC contains springs and riparian vegetation.

Several perennial springs and seasonal streams exist within the proposed LWC, notably in the Cottonwood, Apache, and Hell's Hole Canyon drainages. These riparian environments provide critical water sources and habitat for many species of birds and wildlife, including species of concern such as bighorn sheep. The riparian vegetation in Apache and Cottonwood creeks was noted as a “special feature” in the Arizona Mohave EIS.¹⁰

The Hoverrocker proposed LWC is contiguous to other public lands with exceptional wilderness values.

The adjacent lands to the north and east of the proposed LWC are USFS lands being managed or considered for wilderness values. The Hell Hole WSA to the east encompasses over 18,000 acres of wilderness, including regionally rare Ponderosa pine forests, and exceptional habitat for black bear, elk, deer, and mountain lion¹¹. While not currently designated, the Apache National forest lands immediately north of the proposed Hoverrocker LWC are being considered for management as a WSA. This area is completely undeveloped, with rugged, diverse terrain, and valuable habitat for mountain

9 Arizona Mohave Wilderness Designation: Environmental Impact Statement, Pg. 120

10 Arizona Mohave Wilderness Designation: Environmental Impact Statement, Pg. 120

11 Description of wilderness values in the Hell Hole WSA can be found in the Gila National Forest WSA report, beginning on page 28, available online at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3803860.pdf

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lion, bear, and mule deer. It is also within the Mexican gray wolf recovery zone. Because the proposed LWC is contiguous with these much larger parcels of wild lands, all of these lands will benefit from management for wilderness values. The total combined acreage increases their recreation potential and their conservation value for important species, especially those requiring large home ranges such as mountain lion and wolf.

Scenic Photos

The following 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 author during the field survey 1/13-1/15, 2018.



Scenic Photo 1 – Rolling hills, buttes, and mesas in the southern portion of the proposed LWC. This landscape is ideal for hiking and horseback riding. The unit is situated within a much larger block of undeveloped public lands, enhancing the wild, remote feel. The wildlands of New Mexico’s Gila National Forest are visible on the right side of the field of view. There are no obvious human impacts for many miles.

Hoverrocker Proposed LWC



Scenic Photo 2 – These massive, unnamed, twin buttes dominate the southern portion of the unit. They are topped by about 200 feet of sheer cliffs, providing tempting lines and potential first ascents for traditional rock climbers. Juniper woodlands dot the midground, providing solitude via screening, and wildlife habitat.



Scenic Photo 3 – View up the Apache Creek drainage into the heart of the proposed LWC. This deep canyon system provides outstanding solitude and harbors unique riparian vegetation, critical habitat for a variety of birds and wildlife.

Hoverrocker Proposed LWC



Scenic Photo 4 – View into the canyon system that characterizes the interior of the proposed Hoverrocker LWC. Apache Creek and Hell’s Hole Canyon come together in the midground, providing opportunities for miles of hiking in beautiful, shady canyons. Apache Creek links the unit to the Hell’s Hole WSA, visible in the background, over the New Mexico border.



Scenic Photo 5 – Cliffs over Apache Creek. These dramatic cliffs illustrate the rugged topographic relief of the drainage, and present an excellent rock climbing opportunity. Apache Creek provides exceptional solitude and outstanding hiking, climbing, hunting, and birding opportunities.



Scenic Photo 6 – Looking north into Hell’s Hole Canyon. Here, topographic relief provides complete solitude to the visitor. From here, a hiker can access many miles of wilderness canyons, extending well beyond the borders of the proposed LWC. Hell’s Hole Canyon continues north into the Apache National Forest, while other tributary drainages continue east into New Mexico’s Gila National Forest.



Scenic Photo 7 – A huge sycamore in the Hell’s Hole Canyon drainage. Unique riparian vegetation provides shade, cover, and food, attracting a tremendous variety of bird and mammal life, and offering a relaxing sanctuary for visitors.

Hoverrocker Proposed LWC

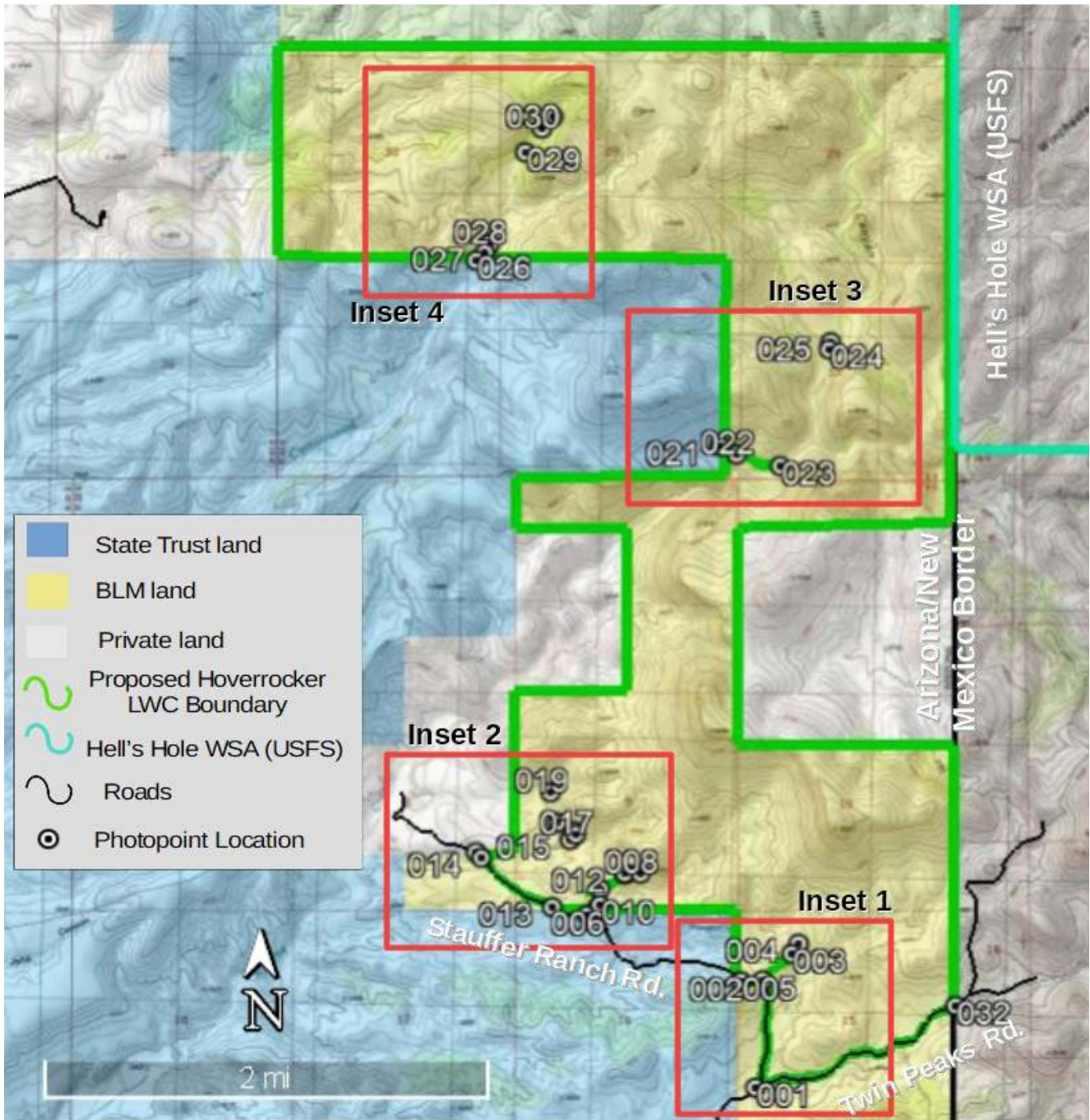


Scenic Photo 8– Rolling uplands in the northern portion of the LWC. This area is transitional from semi-desert scrub and grassland to juniper woodlands. Vegetation and topography both provide solitude via screening. This open landscape invites exploration via hiking or horseback riding, and miles of undeveloped public lands are visible in all directions.



Scenic Photo 9 – A gully through juniper woodlands in the northern portion of the unit. Juniper attracts wildlife, providing both food and shelter. Birders, hunters, and photographers, will all find an abundance of animals; coyote, javelina, rabbit, hawks, woodpeckers, jays, and bluebirds were all observed here.

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



Hoverrocker Reference Map – Showing location of inset maps and photopoints along the unit boundary.

Hoverrocker Proposed LWC



Inset 1 - Photopoints 001-005 and reference point 032. The southern unit boundary is formed by the Stauffer Ranch and Twin Peaks roads. 002 is a cherrystem to a livestock feed and water station (003).



Inset 2 - Photopoints 006-020, along the southwestern unit boundary, including a cherrystem beginning at 006 to a water tank at 007.

Hoverrocker Proposed LWC



Inset 3 - Photopoints 021-025, along the western unit boundary and into the interior of Hell's Hole Canyon. 021 is a cherrystem ending in the canyon bottom.



Inset 4 - Photopoints 026-031, along the western unit boundary. A cherrystem at 026 goes a short distance up the Cottonwood Creek drainage. A primitive route (028, 029) continues up the wash to an abandoned corral (030).

Hoverrocker Proposed LWC

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

The majority of the proposed Hoverrocker LWC boundary is made up of land ownership boundaries between the BLM, USFS, State Trust, and private lands. The southern and southwestern portion of the unit boundary is defined by a pair of Wilderness Inventory Roads, the Twin Peaks Road and the Stauffer Ranch Road. These roads are accessed via the Bitter Creek Rd., off of highway 75 near Apache Grove. The boundary description begins at the southwest corner of the unit; the junction of the Stauffer Ranch and Twin Peaks roads.

- 001 is the junction of the Twin Peaks and Stauffer Ranch roads, both of which comprise the unit boundary.
- 002 is a junction with a short cherrystem road heading north to a livestock feeding and watering station (003). Beyond this station the route becomes faint and unmaintained, ending completely at a turnaround (004).
- At 005, the Stauffer Ranch Rd. crosses into State Trust land. The property line becomes the unit boundary heading north and then west.
- 006 is the start of a short cherrystem heading north into the unit to a water tank (007), and small trash dump (008). There are multiple faint, unmaintained ways branching off of this cherrystem:
 - 009 and 010 each head east a short distance before joining together and rapidly deteriorating. They serve no apparent purpose, minimally impact naturalness, and are kept open only by the infrequent passage of vehicles.
 - 011 is a reclaimed and unused route towards an old, abandoned, mining claim. The mine claim itself (012) is substantially unnoticeable and minimally impacts the naturalness of the area.
- At 013, the Stauffer Ranch Rd. crossed back into BLM land, again forming the unit boundary
- At 014, there is a faint, unmaintained primitive route heading east into a natural wash. The route leaves the wash but remains faint and unmaintained (015), eventually leading to a long abandoned mining claim (016, 017). The routes and impacts associated with the claim are substantially unnoticeable and minimally impact the naturalness of the area. There are two other long abandoned, overgrown routes in this area (018 and 019).
- At 020 the Stauffer Ranch Rd. enters private property, the property line becomes the unit boundary to the north.
- 021 is the beginning of a cherrystem heading east into the unit, accessing the bottom of Apache Creek.
 - At 022 there is a small livestock feeding station near a natural spring, just outside of the cherrystem. This station is substantially unnoticeable from a short distance away and minimally impacts naturalness.
 - The cherrystem ends at 023; the canyon bottom in a natural wash with no obvious vehicle routes.
 - Following the canyon north, there is an old, abandoned corral at 024. The area is overgrown and the corral is unnoticeable from a short distance away. Beyond this point, a primitive route at 025 shows signs of use only by cattle, minimally impacting naturalness.
- 026 is a short cherrystem heading north up the Cottonwood Creek drainage to a campsite at 027.
 - Beyond this point, the route becomes a faint, unmaintained way, used mostly by cattle (028), and eventually disappearing into a natural wash (029). This primitive, unmaintained

Hoverrocker Proposed LWC

Way leads to an abandoned corral (030) and watering trough (031). These impacts are hidden in a densely vegetated canyon, substantially unnoticeable and minimally impacting the naturalness of the area.

- From 026 on, the unit boundary follows State, private, and USFS property boundaries.
- The northern boundary is a 3 mile contiguous boundary with the Apache National Forest. This boundary is completely undeveloped, with exceptional wilderness characteristics on both sides.
- The majority of the eastern unit boundary is the Arizona/New Mexico border, with a small private inholding on the Arizona side in the middle. The eastern boundary is entirely undeveloped and includes nearly two miles of contiguous boundary with the Hell's Hole WSA (USFS) on the New Mexico side.
- At reference point 032, the boundary leaves the state line to become the Twin Peaks Rd., heading southwest and returning to point 001.

This concludes the boundary description