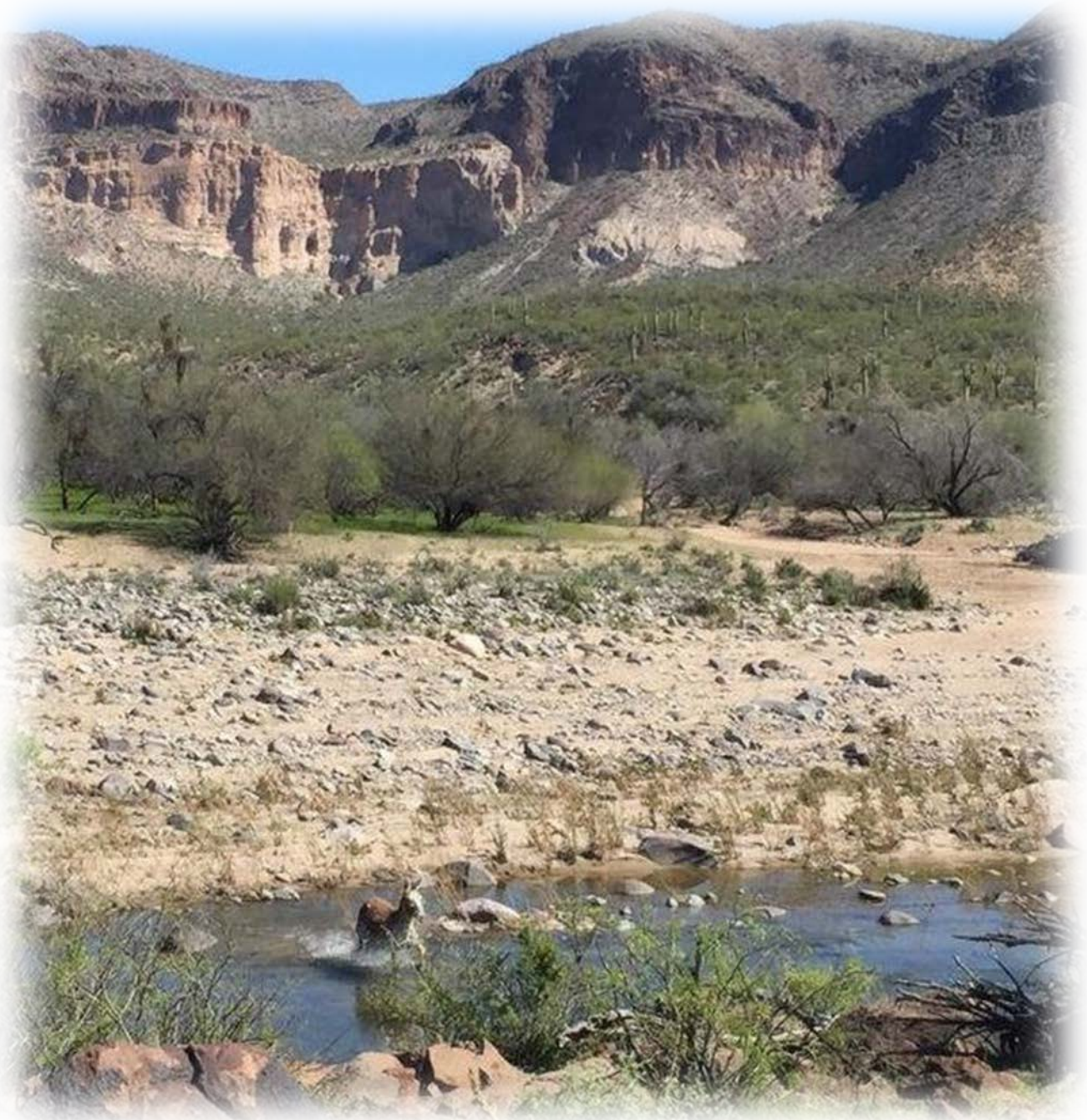


Proposed Lands with Wilderness Characteristics:

Lower Burro Creek



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

August, 2015

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Amber R. Fields



ARIZONA WILDERNESS COALITION



hassayampa  
forestry  
PRESCOTT, ARIZONA

## **Table of Contents**

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***PREFACE: This Proposal was developed according to BLM Manual 6310*** \_\_\_\_\_ ***page 3***

***MAP: Burns Spring Proposed Lands with Wilderness Characteristics (LWC)*** \_\_\_\_\_ ***page 5***

### **SECTION 1: Proposed LWC Overview**

---

***Unit Location*** \_\_\_\_\_ ***page 6***

***Brief Boundary Description*** \_\_\_\_\_ ***page 6***

***Landforms & Biological Communities*** \_\_\_\_\_ ***page 6***

***Hells Half Acre Field Journal*** \_\_\_\_\_ ***page 7***

***Previous Wilderness Inventories*** \_\_\_\_\_ ***page 8***

### **SECTION 2: Wilderness Characteristics**

---

***The proposed LWC meets the minimum size criteria for roadless lands*** \_\_\_\_\_ ***page 8***

***The proposed LWC is affected primarily by the forces of nature*** \_\_\_\_\_ ***page 9***

***The proposed LWC provides outstanding opportunities for solitude or primitive & unconfined recreation*** \_\_\_\_\_ ***page 10***

***The proposed LWC has supplemental values that enhance the wilderness experience & deserve protection*** \_\_\_\_\_ ***page 11***

***Works Cited*** \_\_\_\_\_ ***page 16***

### **SECTION 3: Detailed Boundary & Routes Description**

---

***Narrative Description of the Proposed LWC Boundary*** \_\_\_\_\_ ***page 17***

### **SECTION 4: Photopoint data**

---

***Data Tables & Photographs to accompany the Detailed Boundary & Routes Description*** \_\_\_\_\_ ***page 22***

\* Cover photo by Jeffrey Glessing. All others by Joseph Trudeau and Amber Fields unless otherwise noted

***PREFACE: This Proposal was developed according to BLM Manual 6310***

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*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.<sup>1</sup>

In March 2012, the Bureau of Land Management issued updated manuals for inventorying and managing lands with wilderness characteristics on public lands (hereafter often referred to as LWC's). These manuals provide the agency with direction for implementing its legal obligations to inventory and consider management of lands with wilderness characteristics, including the Federal Land Policy and Management Act's provision that BLM "preserve and protect certain public lands in their natural condition" (43 U.S.C. § 1701(a)(8)). **Manual 6310** (Conducting Wilderness Characteristics Inventory on BLM Lands) guides the BLM on how to meet its obligations to inventory for and identify lands with wilderness characteristics. **Manual 6320** (Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process) guides the BLM on the options available to address lands with wilderness characteristics in land use planning once they have been identified in the required inventory, such as putting management prescriptions in place to protect wilderness characteristics. The purpose of this report is to provide the BLM with recommendations for designation of lands with wilderness characteristics in the Kingman Resource Area of northwestern Arizona, based on new, accurate, and up-to-date information according to **Manual 6310**.<sup>2</sup>

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

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

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

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

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<sup>1</sup>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](http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2011/IM_2011-154.html)

<sup>2</sup> 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](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_manual.Par.38337.File.dat/6310.pdf)

*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**

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.

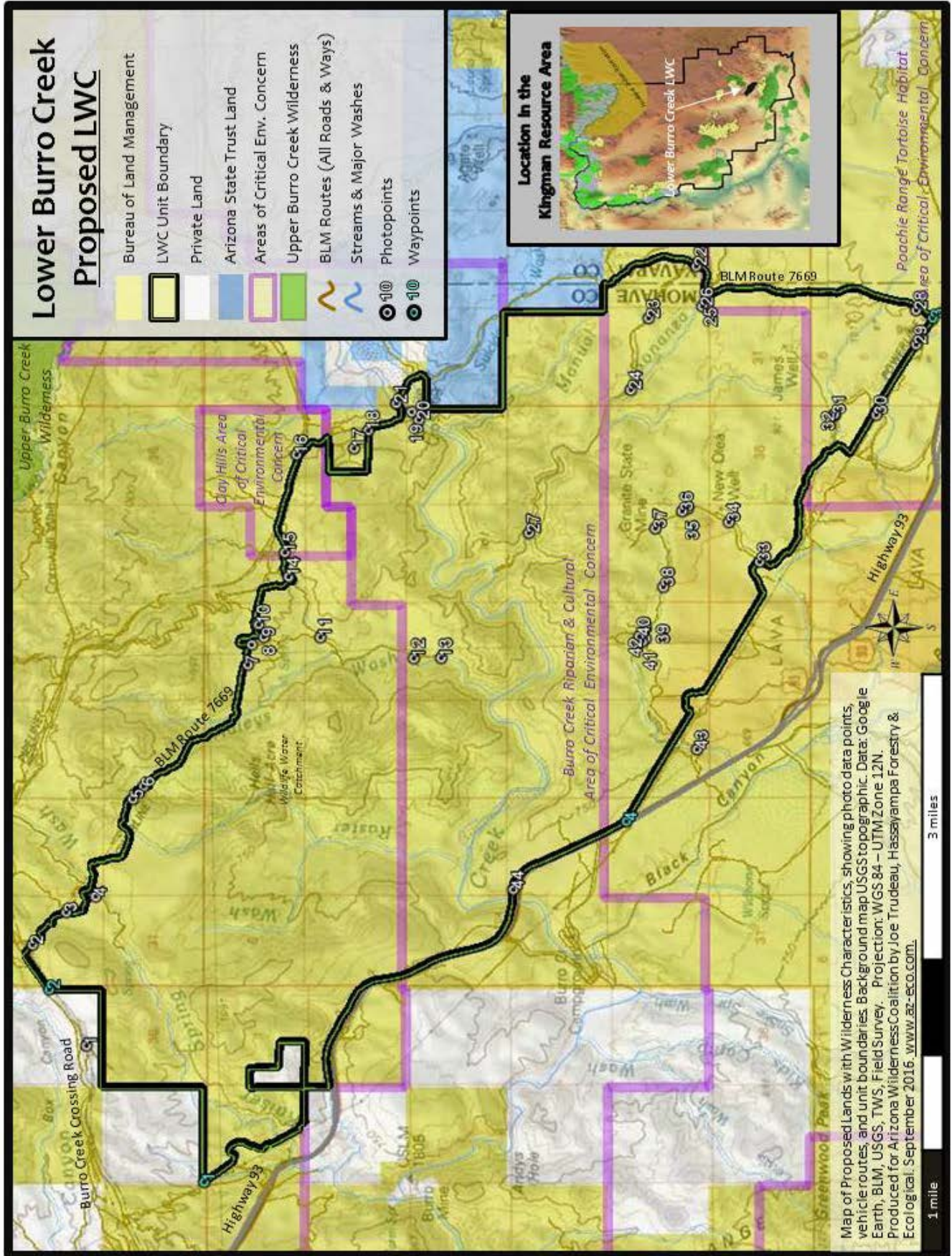
• “Wilderness inventory roads” are routes which have been: (1) *improved and maintained* (when needed), (2) *by mechanical means* (but not solely by the passage of vehicles), (3) *to insure relatively regular and continuous use*.

• “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.



MAP: Lower Burro Creek Proposed Lands with Wilderness Characteristics



## **SECTION 1: Proposed LWC Overview**

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### **Unit Location**

The Lower Burro Creek Proposed LWC is located in the Bill Williams River watershed in west-central Arizona. The ~22,621 acre unit is situated to the northeast of U.S. Highway 93, approximately 10 miles south of Wikieup, AZ, and 10 miles west of Bagdad, AZ, in a transitional area between the Aquarius Mountains to the north, and the Poachie range to the south. The eastern edge of the proposed LWC is along the Mohave-Yavapai County line. Burro Creek runs through the heart of this spectacularly wild natural area, with its outstanding riparian ecosystems, isolated plateaus, and deep canyons. The western part of this unit can be seen from the Burro Creek Bridge along U.S. Highway 93. In addition to Burro Creek, other notable natural features are Kaiser Spring Canyon and Hells Half Acre.

### **Brief Boundary Description**

Generally, the proposed LWC is bounded on the west by U.S. Highway 93, private/BLM property boundaries, high-voltage power lines and the associated utility right-of-way; on the south/southeast by BLM Route 7669; on the east by the BLM/State Land property boundaries and BLM Routes 7666 and 7669; and on the north by another power line and utility right-of-way (BLM Route 7669) as well as by BLM Route 7666, and the BLM property boundary with private lands.

### **Landforms & Biological Communities**

The Lower Burro Creek Proposed LWC contains five distinct plant communities (BLM, 1987), varied landforms, and exceptional wildlife habitat. Most of the western half of the units' mesas, canyons, and hills are composed of series of Tertiary Volcanic Flows; layers of tuff, rhyolitic basalt, and pyroclastic flows. The eastern half is composed of Pre-Cambrian biotite granites. A substantial fault runs from the top of Kaiser Spring Canyon to the southwest, exposing the wildly carved buttes and spires of the area called Hells Half Acre (Arizona Geological Society, 2000). The uplift of this area, coupled with the relative ease that tuff erodes, has allowed the formation of numerous slot canyons, pinnacles, and boulder-strewn wash bottoms that provide outstanding opportunities for primitive recreation and solitude.

In the 1980 initial wilderness inventory, the BLM described the Lower Burro Creek Proposed WSA as:

*"...dominated by a large butte in the center of the unit, dissected by numerous deeply incised canyons with several overhangs, spires, and ridges. To the north the unit includes a part of a large basalt mesa with small, gentle hills on top, and dropping steeply into the heart of the unit. The east and south portions of the unit are dominated by Burro Creek, which meanders 8 miles through the canyon. The canyon is generally wide. Stretches of the river flow through a deep canyon up to 800 feet below the mesa. The vegetation within the unit consists of both Lower and Upper Sonoran Life Zones. Palo-verde saguaro, cottonwood-willow, mesquite bosque, mixed broadleaf riparian, arid grassland, and pinyon-juniper communities are represented within the unit" (BLM, 1980).*

Further detailed discussion of unique and significant plants, animals, and habitats are provided in *Section 2: Supplemental Values*.



**Field Journal, March 13 & 14, 2015, Hells Half Acre**



*"Today we walk five physically strenuous miles in heavy brush. After dropping our packs in a remote canyon, undisturbed by any sign of human presence, we explore another half mile farther into the canyon. We come to a pool of water below stark cliffs that make for some rather difficult climbing. I decide to risk it and engage in a little primitive recreation, without ropes or harness, in order to scale the walls to the north. After doing so, I run ahead for a few minutes, dodging prickly pear and teddy bear cacti, looking for a spring expected to be another mile and a half ahead. No luck. It's either elsewhere or farther on. I return back to my adventuring companions and jump into the pool, into the exhilaratingly cold water."*

*"Feel your smallness; feel your significance. You are small, yet you are significant, for you welcome the sun with human song while the birds welcome it with birdsong. Let the birds educate you in the primitive art of sun celebration. Let the rocks educate you in the primitive art of waiting patiently for the sun's warmth. The plants can teach you something there as well. Let the trees teach you how to soar while staying grounded. The branches soar and the roots are grounded. 'There is knowledge only the wild can give us, knowledge specific to the experience of it. These are its gifts to us,' Jack Turner writes."*

*AWC Volunteer Brian Leibold is a student at Prescott College*

*"Hells Half Acre: this amazing intersection of three main ridges with jagged edges that twisted and turned and appeared as if they had risen up out of the earth. One of the massive rock outcroppings towered several hundred feet up into air at an odd angle and just towered over us. This area was predominantly rocky, canyon-like cliffs gradually increasing to a very sizable canyon. The entrance to the canyon appeared to be 30 feet tall and perhaps 15 feet wide and by the time we camped some 4 hours later, it was 140 feet tall and 60 feet wide. The vegetation in these canyons was negligible other than the prickly pears and chollas clinging to the side of the canyon.*

*Only once we arrived down into Hells Half Acre as the dry wash flattens out did we see Coyote Willow and Fremont Cottonwoods in good numbers. At approximately 1615, three of us headed east into one of the three canyons to find the source of a spring that is known but had not yet been inventoried for the Spring Stewardship Institute. We encountered a level of ruggedness on our route to this spring that included some of the hardest traveling of the entire three days. Catclaw Acacia and Palo Verde were the dominant forces during this short hike, which came to a halt after only 25 minutes of meandering.*

*Before us were well-worn and rounded rocks surrounding a very oddly shaped spout that water had carved, approximately 4-5 feet tall. Only one of us was able to make it past this area as the source of the water was incredibly slippery with algae, so the survey would have to wait on this spring.*

*AWC Volunteer Jeffrey Glessing is a student at Prescott College*



Photos taken by Jeffrey Glessing

### **Previous Wilderness Inventories**

The Lower Burro Creek Proposed LWC has long been recognized for its outstanding wilderness characteristics. The unit was identified during the BLM's 1979 initial review of potential wilderness lands (BLM, 1980a) and subsequently proposed for designation as a Wilderness Study Area (WSA) and named "Lower Burro Creek - Unit AZ-020-060" by the BLM in the agencies sweeping grazing management plan for the Hualapai-Aquarius area (BLM, 1980b). The proposed WSA contained 22,300 acres, so the unit boundaries were likely very similar to the LWC we are proposing. In September of 1982, the BLM released the Upper Sonoran Draft Wilderness Environmental Impact Statement, where the agency further proposed that Lower Burro Creek WSA be designated as a Wilderness Area. In this document, the BLM stated:

*"BLM can well manage the WSA's wilderness resources because it controls all the WSA's surface and 96 percent of its mineral rights. Moreover, the area has few resource conflicts...[and] has exceptional wilderness values, public and multiple resource benefits, and excellent wilderness manageability"* (BLM, 1982: p. 18).

The map provided in the BLM's own Wilderness Proposal closely matches the proposed LWC boundary that we present here. Our proposal maintains the northern boundary along an existing powerline, but adds two sections of land that were private in 1982 and are now owned by BLM. Also, the agency cherrystemmed two routes that our survey determined to not meet the definition of a wilderness inventory road. These are the routes down Bonanza Wash and to New Olea Well, discussed in detail later in this report.

When the BLM released the Final Upper Sonoran Wilderness EIS in 1987 the BLM's Proposed Action Alternative recommended that 21,660 acres was suitable for wilderness designation. There, the agency stated that the area was *"predominantly natural with human imprints largely unnoticeable...offers outstanding opportunities for solitude...and the perennial waters offer outstanding backpacking, camping and hiking opportunities"* (BLM, 1987: p. 113.) Unfortunately, Lower Burro Creek was not advanced for Congressional Wilderness designation, the protection that the area deserves. Since then, the Arizona Wilderness Coalition has continued to advocate for the protection of this exemplary natural area (Arizona Wilderness Coalition, 2006).

### **SECTION 2: Wilderness Characteristics**

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#### ***The proposed LWC meets the minimum size criteria for roadless lands***

The Lower Burro Creek Proposed LWC includes ~22,621 acres of contiguous BLM land, exceeding the 5,000+ acre criteria set forth in BLM Manual 6310. The unit is generally a 10 mile by 4 mile rectangular block, oriented northwest to southeast. The boundaries of the unit consist of wilderness inventory roads, utility corridors, and property lines with state and private land. One area of inactive mining in the northeast edge of the unit was excluded because of its deleterious effect on the units' otherwise outstanding degree of naturalness. There are no cherrystemmed wilderness inventory roads penetrating the unit. There is one private inholding; a 115 acre parcel along the western edge of the unit, just south of Kaiser Spring Canyon. The parcel is undeveloped, and is not accessed by any vehicle routes.



***The proposed LWC is affected primarily by the forces of nature***

The Lower Burro Creek LWC appears entirely natural to the average visitor. The experienced naturalist or backcountry traveler would find that the vast majority of the unit to be in near-pristine condition. The primary human impacts observed during fieldwork largely consist of ranching infrastructure, and inactive mining sites that occur at a few locations.

*Primitive Routes*

Very few primitive routes (ways) enter into the unit. These routes, described in detail in Section 3, are lightly used, single lane two-tracks that do not penetrate deep into the core of the unit. It is our determination that the existence of these routes does not substantially affect the wilderness user experience.

*Ranch Infrastructure*

Cattle ranching infrastructure within the unit is substantially unnoticeable, mostly consisting of barbed wire fences and water/feed stations, and generally restricted to areas near the LWC boundary, and not deep within the heart of the unit. A windmill exists at Photopoint 15, along Burro Creek Crossing Road, which is excluded from the unit. An unmaintained way leads to a windmill and corral at New Olea in the south-central portion of the unit near Photopoint 34, and to the southeast of that, another unmaintained way (see Photopoint 31) provides access to a stock tank and corral which appeared to be in disrepair. These ranching facilities are minor impacts to the naturalness of this unit because they are very small, near the unit boundary, and receive minimal use based on our observations. Furthermore, windmills and corrals regularly occur within wilderness areas, thus we determine that these human impacts are not inconsistent with LWC protection.

*Wildlife Water Catchments*

Arizona Game and Fish Department has installed one water catchment within the unit. Hells Half Acre Tinaja (Water ID 1,080) is shown on the map. In cooperation with the Arizona Desert Bighorn Sheep Society, AZGFD has constructed water catchments throughout the Kingman Resource Area to primarily benefit the desert bighorn sheep herds. These installments are built to blend in with the surroundings, and are often painted to match the local rocks. Currently, AZGFD maintains catchments in several of the existing wilderness areas in the Kingman Resource Area. It is our determination that, because such installments can be accommodated within LWCs, that this one in particular does not substantially affect the naturalness of the unit.

*Inactive Mining*

Three locations of inactive mining were observed during field inventories, one of which was excluded from the unit because of its effect on naturalness. Very old evidence of mining and/or prospecting occurs in the south-central region of the unit at the abandoned Key Mine, Granite State Mine, and Golden Key Mine. No current activity was observed. The routes that access these sites are unmaintained ways that are growing in with thick brush, and the very minimal diggings that we could locate have revegetated with long-lived native plants and do not create a substantial visual impact to the casual visitor (see Photopoints 35-42).

An historic mining operation is situated at the confluence of Bonanza Wash and Burro Creek, about 1/3 of a mile northwest of Photopoint 27. The site can only be reached by foot, horse, or narrow ATV's driven by skilled drivers. The un-sanctioned route down Bonanza Wash is unmaintained, and ends for most vehicles at a boulder pile constriction at Photopoint 27. The mine has been inactive for

decades, and all that is left are the corroding remains of water tanks, piping, a wood and metal structure, and a collapsing head-frame at the adit location. The age of this site shows how nature is reclaiming the works of man. The power of flooding, erosion, windblown sand, and decay are evident, as the remains of this operation are in terrible disrepair. Artifacts at this site are probably greater than fifty years old, and are thus may be protected by the Antiquities Act. We feel that LWC designation would protect this component of our nation's history, by reducing the likelihood that vandals or thieves can access the site by vehicle.

Claim stakes occur sporadically throughout the unit at claim corners, but no active mineral exploration is currently underway. The presence of mineral claims does not affect naturalness, as *"undeveloped possessory interests (e.g., mineral leases) are not treated as impacts to wilderness characteristics because these rights may never be developed"* (BLM Manual 6310, page 10).

#### *Summary of Human Impacts*

Collectively, the impacts documented above do not substantially detract from the naturalness of the proposed LWC. The impacts are specific to small areas, are predominantly inactive or very seldom used, and are showing signs of decay and disrepair. The power of nature to reclaim these historic impacts is evident in their condition. This untamed landscape continues to exhibit wilderness characteristics despite the surrounding impacts of man. U.S. Highway 93 is largely undetectable from within the unit due to the great amount of vertical relief in the LWC, and that, with exception of Burro Creek Bridge, the unit rises steeply from the highway, and the heart of the unit is never visible from the road. The northern and southwestern unit boundaries consist of power line corridors, which are substantially unnoticeable from within most of the unit due to the large amount of vertical relief. Additionally, the Bagdad Mine is only perceivable from the far north and northeastern part of the unit, and even then distant lights were barely noticeable compared to the grandeur of the landscape and ecology within the Lower Burro Creek LWC. When in the heart of Burro Creek, Kaiser Spring Canton, or at Hells Half Acre, a visitor is alone in a remote and wild area, truly deserving of LWC protection.

#### ***The proposed LWC provides outstanding opportunities for solitude or primitive & unconfined recreation***

The terrain in the Lower Burro Creek Proposed LWC offers a wide variety of absolutely outstanding opportunities for both solitude and primitive & unconfined recreation. The abundant water resources in the proposed LWC provide primitive opportunities for fishing, swimming, whitewater boating, riparian bird watching, and extended backpacking trips. Undulating foothills rise to meet beautiful white tuff and black basalt cliffs and mesas, which fall steeply into winding canyons and washes. This diverse landscape offers abundant places to get away from signs of civilization and find silence and solitude. In the four days that the AWC inventory team spent surveying the area, we encountered no other people within the Lower Burro Creek LWC, and no encounters were had during the 3-day backpacking trip that the AWC volunteers completed in March. Because of hot summer temperatures, we feel that we visited the area during the peak visitation season, and still, saw no one. This area is particularly well-suited for primitive recreation, and the BLM has even stated that the *"most important among these pursuits are camping, hiking, backpacking, nature study, rockhounding and photography"* (BLM, 1993: p. 75).

The topographic and vegetative screening within the proposed LWC provide for solitude. There are numerous ridges, basins, bajadas, mountaintops and mountainsides where the topography provides

outstanding isolation and solitude from other visitors. Burro Creek and Kaiser Spring Canyon run through deep gorges with many twists and turns that give a renewed sense of isolation with each bend in the creek. Hell's Half Acre includes deeply incised slot canyons and rugged peaks that remain relatively unexplored and provide abundant opportunities for solitude and isolation. In washes and on hillsides below the many rugged mountains and plateaus of the unit, vegetative screening is exceptional, with a diversity including paloverde, desert scrub, and pinyon-juniper vegetation types. As in any Sonoran desert landscape, the excellent vegetative screening provided by riparian woodlands delivers exceptional opportunities for solitude from other visitors. Large cottonwood trees and willow thickets grow along the creeks, providing not only opportunities for solitude but also unique riparian habitat not found elsewhere in the unit.

Recreational visitors find many opportunities for primitive forms of recreation within the proposed LWC. Burro Creek offers perennial flows for people to enjoy all year round; an especially valuable component in an arid landscape. Indeed, free-flowing water in Arizona provides for outstanding recreational experiences simply because you can be in or near the water in such a dry environment. This alone is worthy of protection. Moreover, when faced with not only the rare beauty of Lower Burro Creek, but also the power and immensity of such a place; one cannot deny its exceptional intrinsic value. The confluence of Bonanza Wash and Lower Burro Creek is one place among many within the proposed LWC to experience such immensity. The power of the floods that take place at this confluence is apparent to any human to venture there. The level and places that drift wood has been brought by such floods is truly astonishing. A large bedrock island has been shaped, smoothed, and scoured from millennia of flooding. To experience such wonders has become a rarity. To see such flooding would be more than outstanding. With fewer and fewer places for humans to feel humbled in nature, it is imperative that Lower Burro Creek be protected as a place for Americans to experience firsthand the powerful forces of raw nature.

***The proposed LWC has supplemental values that enhance the wilderness experience & deserve protection***

The Lower Burro Creek Proposed LWC features numerous supplemental wilderness values that merit protection through designation as a Land with Wilderness Characteristics. Section 2(c)(4) of The Wilderness Act clearly explains that supplemental values are “*ecological, geological, or other features of scientific, educational, scenic, or historical value.*” This proposed LWC contains numerous examples of each of these categories. Some ecological values include important habitat for the Sonoran desert tortoise, important habitat linkage for the desert bighorn sheep, habitat for endangered species, and lush riparian environments. From a geological perspective, the deeply-incised canyons provide windows into a fiery era of volcanism, and a long period of erosion that has carved wild slot canyons and broad valleys. The scientific and educational value of the entirety of the Burro Creek watershed cannot be overstated, as more than fifteen agencies, academic institutions and other organizations have visited this waterway to study wildlife, archaeology, and ecosystems. Historic mining sites, long-abandoned and now slowly giving way to weathering, are a vital record of human land use over the past 150 years. And, finally, the proposed LWC features the “*outstanding scenic qualities*” of Burro Creek (BLM, 1993: p. 108), the legendary and remote area called Hells-Half-Acre, and the equally impressive gorge formed by Kaiser Creek.



### *Areas of Critical Environmental Concern*

The Lower Burro Creek LWC contains portions of three Areas of Critical Environmental Concern (ACEC) totaling approximately 9,160 acres of ACEC lands. These special designation lands help protect special status plants, wildlife, cultural sites, spectacular scenery, and riparian areas. These areas are shown and labeled on the proposed LWC map.

**Burro Creek Riparian and Cultural ACEC** encompasses 22,682 acres in the Burro Creek Watershed, of which approximately 7,800 acres are included in the proposed LWC. This ACEC was established following the 1993 Resource Management Plan that found that Burro Creek offers “outstanding riparian resources; rare and outstanding cultural resources; and important threatened and endangered habitat” (BLM, 1993: p. 92).

The Lower Burro Creek unit contains approximately 1,000 acres within the **Poachie Desert Tortoise Habitat ACEC**. This crucial desert tortoise habitat is located in the far southern corner of the proposed LWC. The Poachie ACEC contains Category 1 habitat which means that this area is *vital for the continuation of viable desert tortoise populations* (emphasis added). As stated by the BLM, “*The future of this species could depend on how well the BLM manages the remaining desert tortoise habitat*” (BLM, 1993: p. 106).

**Clay Hills Research Natural ACEC** encompasses 1,114 acres of unique vegetation growing on uncommon, clay-rich ancient lake deposits, including the federally endangered Arizona Cliffrose (*Purshia subintegra*). This ACEC is bisected by Burro Creek Crossing Road, and 360 acres of it are on the south side of the road, encompassed by the proposed LWC.

### *Wild & Scenic River Recommendation*

Burro Creek was determined by BLM to be eligible for Wild & Scenic River designation in the 1993 Resource Management Plan. At the time of that analysis, of the 51.6 mile river corridor, 31.4 miles were under BLM ownership. The agency then conducted a thorough review of Arizona’s Rivers, including Burro Creek, in its “Final Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement”, and remarked therein that Burro Creek “*is free-flowing and has outstandingly remarkable scenic, recreational, fish and wildlife habitat, and cultural resource values*” (BLM, 1994: p. 175).

In this review, Burro Creek was divided into 5 segments based on the segments classification as recreational, wild, or scenic. Segment 4 encompassed a portion of Burro Creek “*coursing nine miles entirely through public land, extend[ing] from Six-Mile Crossing to Highway 93...[and] classified as wild*” (BLM, 1994: p. 176). This segment is entirely within the proposed LWC. Ultimately, the Department of the Interior signed a Record of Decision that determined this section, and three others, as suitable and recommended for designation as part of the Wild and Scenic Rivers System. However, Congress has not advanced this legislation.

*The proposed LWC would protect high-quality riparian areas*

As discussed above, the Lower Burro Creek Proposed LWC is protected by ACEC designation for riparian values, *and* has been recommended to Congress for designation as a Wild and Scenic River. Here, we provide some more specific information to support our proposal for further protection by LWC designation.

Burro Creek is a free-flowing intermittent perennial stream that runs for about nine miles through the proposed LWC. Most of the stream corridor is a ribbon of deciduous riparian forest, woodland, and streamside habitats that are among the rarest and most threatened ecosystems in the entire State of Arizona, amounting to less than 1% of the land area. The importance of these areas is disproportionate to their occurrence because of their multiple benefits, such as providing recreational amenities, habitat and travel corridors for wildlife, livestock grazing and their influence on water quality and quantity (Zaimes et. al, 2007). Burro Creek provides habitat for a wide variety of unique wildlife, including 14 federal-, state-, and BLM-sensitive species. The riparian habitat associated with this area supports a great diversity of birds of prey, such as bald eagle (*Haliaeetus leucocephalus*), zone-tailed hawk (*Buteo albonotatus*), and peregrine falcon (*Falco peregrinus*). There are more breeding pairs of Mexican black-hawks (*Buteogallus anthracinus*) in Burro Creek than anywhere else in North America (BLM, 1993). Five native fish species occur in this section of Burro Creek, including longfin dace (*Agosia chrysogaster*), desert sucker (*Catostomus clarkii*), Sonora sucker (*Catostomus insignis*), roundtail chub (*Gila robusta*; a candidate for endangered listing), and speckled dace (*Rhinichthys osculus*) (Turner & List, 2007). All five of these fishes are listed as Species of Greatest Conservation Need, identified in the Arizona State Wildlife Action Plan (AZGFD, 2012).

In addition to Burro Creek, the proposed LWC would protect other significant riparian resources: Kaiser Spring Canyon in the western region of the unit, with 2.5 miles of spring-fed creek running through the unit; and an unnamed seasonal stream that runs through the area known as Hells-Half-Acre. Volunteers for Arizona Wilderness Coalition visited these two locations in mid-March, 2015, on a three-day backpacking trip through the proposed LWC. The group documented rich riparian communities of Fremont cottonwood (*Populus fremontii*), coyote willow (*Salix exigua*), and velvet ash (*Fraxinus velutina*), with isolated pools, trickling sandy-bottomed streams, and water-polished cascades. A variety of amphibians are likely to occur in the streams and springs within this unit, including the Lowland leopard frog, a species that is a Species of Greatest Conservation Need, identified in the Arizona State Wildlife Action Plan (AZGFD, 2012) Breeding red-spotted toads (*Bufo punctatus*) were observed in the pools within Hells-Half-Acre.

*The proposed LWC would protect crucial habitat for the Sonoran Desert Tortoise*

The Lower Burro Creek unit contains valuable habitat for the Sonoran desert tortoise (*Gopherus agassizii*: Sonoran population), which is considered a species of concern for the U.S. Fish and Wildlife Service and the Arizona Game and Fish Department. As discussed above, a portion of the proposed LWC is protected by The Poachie Desert Tortoise ACEC, which contains Category 1 habitat. Current tortoise population estimates are unclear, but with the steady increase of motorized and non-motorized recreation their numbers may be in decline. Because of the impacts of vehicles on the

desert tortoise, sustainable tortoise populations will be best protected by reducing road densities and limiting vehicle access to their habitat. Land with Wilderness Characteristic protection offers a highly protective and long-term tool available to the BLM to accomplish this.

*The proposed LWC would protect important habitat linkage between existing Wilderness areas*

The proposed LWC would provide enhanced habitat linkage between the Upper Burro Creek Wilderness Area and the Arrastra Mountain Wilderness Area. Additionally, Arizona Wilderness Coalition has proposed LWC protections for the mountains between the Arrastra Mountain Wilderness Area and the Highway 93 boundary of the Lower Burro Creek unit. All together, the protection of all of these units of land would amount to several hundred thousand acres of important wildlife habitat. Arizona Game and Fish Department has identified the Highway 93 corridor from Wikieup south to near State Highway 97 as a “Potential Linkage Zone” (AZGFD, 2012). This linkage zone bridges the wild country of the Lower Burro Creek Proposed LWC with the desert slopes of the Poachie Range Proposed LWC.

*The proposed LWC would further protect the endangered Arizona Cliffrose*

The Lower Burro Creek Proposed LWC provides crucial habitat for the federally endangered Arizona Cliffrose (*Purshia subintegra*), which occurs only at four known disjunct locations in its range, all of which are in central Arizona. The type locality for this low, straggling woody shrub in the Rose family is in fact within the subpopulation in the northwestern corner of the proposed LWC, which the BLM has identified as offering “*the greatest potential to maintain this species through special management practices*” (AZGFD, 2001; BLM 1993, p.109). This population, first described in 1941, occurs in rolling limestone hills where ancient lake deposits formed fine white clays that are high in lithium, nitrates, and magnesium, as well as metamorphosed tuff. This unique geologic formation is one of only eight such Tertiary lacustrine basins in Arizona (Anderson, 1996). Because of the plants limited range, acute substrate requirements, and its sensitivity to threats such as cattle grazing, burro browsing, mineral development, rockhounding, road and utility construction, and off-road vehicle use, the plant was designated as “Endangered” by the U.S. Fish & Wildlife Service in 1984 (AZGFD, 2001; USFWS, 1984). During the spring of 1989 the BLM completely fenced the Burro Creek population to exclude cattle and burros. In 1990 it was further identified by the U.S. Forest Service as “Sensitive” in the southwestern region, and in 1993 the Arizona Native Plant Law applied the “Highly Safeguarded” State Status to it. By 1995, the U.S. Fish & Wildlife Service had released its Recovery Plan, and the BLM had protected 1,114 acres around the population as the Clay Hills Research Natural Area of Critical Environmental Concern (ACEC), (BLM, 1993; USFWS, 1995), 360 acres of which occur within the proposed LWC.

During our January and February field inventories of the Lower Burro Creek Proposed LWC, we observed several groups of rockhounds prospecting along the roadsides within the stretch of Burro Creek Crossing Road that passes through the ACEC. We also observed that cattle still graze the area, wild burros are abundant, and there are a number of user-created routes in the area. In 1990, the BLM estimated that nearly 25% of the Burro Creek population had been disturbed or destroyed by mining for high-grade bentonite clays (USFWS, 1995). Because existential threats to Arizona Cliffrose still exist, and for the reasons discussed above, the AWC strongly believes that the additional protections



afforded by Land with Wilderness Character designation are important to help achieve effective recovery and maintenance of this imperiled species, and that LWC designation and management are a natural extension of the past 20 years of management improvements that have occurred following the species federal endangered-status listing.

*The proposed LWC would protect sensitive archaeological sites and culturally important areas*

The proposed LWC is considered a Cultural Resource Sensitive Area by BLM with high density index values for archaeological sites (BLM, 1980b). Five sites have been identified for designation on the National Register of Historic Places, including prehistoric camps and quarrying sites (BLM, 1987). The abandoned mine at the confluence of Bonanza Wash and Burro Creek is an important historic site that would benefit from LWC protection.

*The proposed LWC would provide protection for an exemplary scientific and educational study area*

The Lower Burro Creek Proposed LWC would protect an area that has been widely recognized for its scientific and educational value. According to the BLM:

*“Various individuals and organizations have been involved in intensive studies and recreational activities in Burro and Francis creeks. These include the University of Arizona, Arizona State University, Southwest Hawkwatch, the National Audubon Society, the Desert Tortoise Council, the U.S. Fish and Wildlife Service, the Arizona Natural Heritage Program, The Nature Conservancy, Prescott Community College, New Mexico State University, the Arizona Game and Fish Department, the Arizona Department of Health Services, the Arizona State Land Department and the U.S. Geological Survey. Recreationists come from all over the U.S. to visit this area. This involvement demonstrates a more-than-local significance.” (BLM, 1993: p. 108)*

Recently, in 2013 the Verde Valley School used the proposed LWC to teach their students to use navigational equipment and read a topographical map (<http://vvsaz.org/field-trips/>). The diversity of habitats, opportunities to observed rare, threatened, or endangered species, and the remote and nearly pristine nature of the unit make is an excellent natural study area that deserves protections that can maintain the viability of this scientific and educational resource.

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### ***SECTION 3: Detailed Boundary & Routes Description***

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#### ***Narrative Description of the Proposed LWC Boundary***

This section of the report provides a detailed boundary description for the Lower Burro Creek Proposed LWC unit, including all wilderness inventory roads that comprise the unit boundary, all of the primitive routes/ways that permeate the unit boundary, and all other boundaries, such as land ownership, utility corridors, and other excluded areas. Many portions of the unit boundary have been determined according to wilderness inventory road identification protocols described in BLM Manual 6310, which states that a “way” maintained solely by the passage of vehicles does not constitute a “road” for purposes of inventorying lands with wilderness characteristics. Furthermore, the fact that a “way” is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means, but is no longer being maintained by mechanical methods is not a road. A wilderness inventory road, by comparison, is a vehicle route that has “been improved and maintained by mechanical means to ensure relatively regular and continuous use” (Manual 6310, p. 11). Based on these criteria, the Lower Burro Creek Proposed LWC unit contains about 22,614 contiguous roadless acres, with few primitive routes permeating the unit boundary, and none cutting into its core. The Photopoints described here of the Lower Burro Creek Proposed LWC are listed in detailed tables with photographs following this description. Beginning at Waypoint 1, the proposed LWC unit description will move clockwise around the unit.

#### ***Northern Boundary***

The northern Lower Burro Creek Proposed LWC boundary is comprised of a power line and utility right of way (BLM Route 7669), as well as by BLM Route 7666, and the BLM property boundary. Starting at Waypoint 1, the BLM property line is the proposed LWC unit boundary to Waypoint 2. Photopoint 1 is an image of a primitive route that cuts into the northwestern part of the proposed LWC unit. This way was not constructed, is not maintained and does not meet the definition of a wilderness inventory road as defined by BLM Manual 6310. Because the way in Photopoint 1 is not a road, the BLM property bound is the proposed LWC boundary for the entire northwest portion of the unit. Moving east from Photopoint 1, the BLM property boundary intercepts BLM Route 7666 at Waypoint 2. BLM Route 7666 is the LWC boundary for just under a half mile at which point the powerline and the associated utility access (Photopoint 2) becomes the Lower Burro Creek unit boundary. Moving east along the wilderness inventory road (powerline), Photopoint 3 shows a primitive way that leaves the utility access road and goes southwest down a wash. As Photopoint 3 displays, this way was not constructed, is not maintained and receives limited ORV use. This primitive route is not in the BLM route data, serves no apparent purpose, and goes only a short way before ending at some cliffs. Photopoint 4 shows another primitive route that heads southwest down Kaiser Spring wash into the unit from the utility corridor. This unnamed BLM route was never constructed, is not being maintained, and used to be used to access a corral. At the time of the Arizona Wilderness Coalitions’ inventory, the primitive route ended at bend in the wash where the canyon narrows and vegetation is growing in the wash before ever reaching the old corral. Therefore, this primitive route is not a wilderness inventory road. The BLM route inventory data shows a route leaving the powerline access road near Photopoint 5 and making a loop that meets back up with the powerline road near Photopoint 6. This route was most



likely created when the powerline was being constructed, but does not exist on the ground as a vehicle way anymore. Furthermore, the BLM states in its' data that this route was identified using only photo-interpretation and is not based on ground-truth. Traveling southwest along the wilderness inventory road (powerline), there are no more routes entering the unit until Photopoint 7. Photopoint 7 shows an old route that shows no evidence of construction and is revegetating. This primitive route is not being maintained and is not a wilderness inventory road. Photopoint 8 was taken at the other end of this way where it meets back up with the powerline road. This end of the primitive route does show evidence of being constructed, but as the photo shows, it gets minimal use and is definitely not being maintained. Photopoints 9 and 10 display a primitive wash route that has no evidence that it was constructed, is not being maintained, and therefore is not a wilderness inventory road as defined by BLM Manual 6310. Photopoint 11 was taken further down this primitive wash route looking up another way in another wash that the BLM has in their route data. As Photopoint 11 shows, this way contains no evidence of construction or maintenance, and is just a wash. Continuing south down the same primitive wash route displayed in Photopoint 9, Photopoint 12 shows another primitive route leaving the wash. As Photopoint 12 displays, this way contains no evidence of construction or maintenance, and serves no apparent purpose. Continuing down the wash, Photopoint 13 was taken where a fence crosses the wash and ends vehicular travel down the wash. Although there is evidence of people driving in the wash up to this point, this primitive wash route seems to serve no purpose, was not constructed, is not maintained, and does not meet the definition of a wilderness inventory road.

Returning to the powerline wilderness inventory road that serves as the Lower Burro Creek Proposed LWC unit boundary, there are no more routes that enter the unit to the south. Continuing east, the powerline road intercepts BLM Route 7666 (Burro Creek Crossing Road), which becomes the LWC unit boundary at this intersection. Photopoint 14 was taken further south on BLM Route 7666, at the other end of the wash pictured in Photopoint 11. Although the BLM route data shows a route leaving the wash further down BLM Route 7666, there was no evidence of this on the ground. Photopoint 14 shows the most likely place where vehicles would exit the wash, and as the picture displays, this way is not being used. Additionally, even though the BLM route inventory data shows this supposed route continuing up the wash, there is no evidence of this on the ground. Continuing east along the wilderness inventory road (BLM Route 7666), Photopoint 15 shows a short spur road leading to a windmill and water tank. This spur road was constructed, has received a recent blade, and therefore the road and ranching infrastructure has been excluded from the LWC unit. From Photopoint 15, BLM Route 7666 remains the unit boundary for about a quarter of a mile until the LWC bound becomes the gas pipeline that runs parallel and south of the road. The gas pipeline is the Lower Burro Creek Proposed LWC unit boundary until near Photopoints 16.

### ***Eastern Boundary***

The Lower Burro Creek Proposed LWC unit is bounded primarily by the BLM/State lands property boundaries and BLM Routes 7666 and 7669. Just south of Photopoint 16, the proposed LWC boundary becomes BLM Route 7666 again. Photopoint 16 shows a reclaimed mine in this area. This reclaimed mine has been left within the proposed LWC because it is revegetating, and is substantially unnoticeable on the ground, especially when compared to the mines in Photopoints 17 and 18.

Photopoints 17 and 18 show two old mines that are excluded from the LWC unit. The proposed LWC boundary was drawn to efficiently exclude these mining impacts in a simple manner.

Approaching Six Mile Crossing on Burro Creek, Photopoint 19 was taken of a way that leads to a primitive campsite. Although this way was constructed using cut and fill techniques, it is not maintained and has not been maintained in a very long time, and therefore is not a wilderness inventory road. Directly to the west of Photopoint 19, the BLM route inventory data shows a route going south for a short distance into the proposed LWC unit. This unnamed route to the west of Photopoint 19 displays no evidence of construction; is not being maintained; is a "Need to Verify" in the BLM route inventory data; and is a way, not a road as defined by BLM Manual 6310. Photopoint 20 shows the view from the primitive campsite at the end of the way shown in Photopoint 19. Photopoint 20 displays the view looking into Lower Burro Creek Canyon, and an amazing Precambrian granite gorge in the creek. Photopoint 21 shows a blown-out primitive camping zone adjacent to Six Mile Crossing on Burro Creek. This way displays no evidence of construction or maintenance, and is not a road. BLM Route 7666 remains the Lower Burro Creek LWC unit boundary though Six Mile Crossing, and up until it intersects BLM Route 7669. At the intersection, BLM Route 7669 becomes the wilderness inventory road for just under a mile until it leaves BLM land. At this point, the LWC unit boundary is the BLM/State property boundary. The property line is the unit boundary until it intercepts BLM Route 7669. BLM Route 7669 becomes the wilderness inventory road once again. Continuing south, Photopoint 22 displays a primitive route that heads northwest down a dry wash into the unit. This wash way shows no evidence of being constructed and is not maintained. Traveling down this way, it goes in and out of the wash. The way appears to have been user created, but seems to get limited ORV traffic. There is no apparent purpose to this primitive route, and it is not a wilderness inventory road by the BLM Manual 6310 definition. Photopoint 23 stands as further evidence that this route is not a road, displaying erosion and encroaching vegetation. Photopoint 24 was taken at the point where this primitive route intersects Bonanza Wash. Returning to BLM Route 7669 (wilderness inventory road), Photopoint 25 was taken where, from aerial imagery, there appears to be a route entering the proposed LWC unit. However, Photopoint 25 makes it clear that even if this used to be a route, its entrance is now fenced off and the way is revegetating. Leaving the wilderness inventory road and heading down Bonanza Wash, Photopoint 26 was taken on the west side of the wash. Like Photopoint 25, Photopoint 26 was also taken because from aerial imagery it appears that there is a way leaving Bonanza wash. Nevertheless, as Photopoint 26 shows, this way displays no evidence of construction or maintenance, serves no apparent use, and is revegetating. Photopoint 27 was taken further down Bonanza Wash. As this picture illustrates, Bonanza Wash gets vehicular use, but a road was never constructed and the wash gets no mechanical maintenance. At Photopoint 27, the wash becomes partially blocked and only ATVs would be able to continue toward Burro Creek. Bonanza Wash is not a wilderness inventory road according to the definition outlined in BLM Manual 6310. Returning to the Lower Burro Creek unit boundary, BLM Route 7669 continues south as the wilderness inventory road. Photopoint 28 pictures a way leading to a campsite to the north of BLM Route 7669. This way shows no evidence of construction or maintenance. The way gets even more primitive past the camping area and seems to be user created. Two other similar campsites can be found between Photopoint 28 and Bonanza Wash, but do not affect the Lower Burro Creek Proposed LWC unit boundary.

### ***Southern Boundary***

The southern Lower Burro Creek Proposed LWC bound is the powerline and associated utility corridor, as well as several wilderness inventory roads. Waypoint 3 marks the most southern corner of the proposed LWC. The unit boundary turns northwest and becomes the powerline and associated utility access road (BLM Route 7676). Heading northwest along the powerline corridor, Photopoint 29 shows a primitive route that leaves the wilderness inventory road. As the photograph displays, this is a dry wash that was never constructed into a road, is not being maintained, and serves no evident purpose. Photopoint 30 was taken of another primitive route leaving the powerline road. Although this way was once bladed, evidenced by very old roadside berms, it is not currently being maintained and no clear purpose for its use was detected in the field. As the photo shows, this way is being eroded, is growing in with vegetation, and does not meet the definition of a road. Continuing northwest along the powerline, another primitive route leaves the corridor heading east into the unit. Photopoint 31 shows the average condition of this way, which leads to a stock tank and corral. This way has no evidence of construction or mechanical maintenance, and therefore does not meet the definition of a wilderness inventory road. Photopoint 32 shows a way leaving the primitive route shown in Photopoint 31. This way also eventually leads to a stock tank, but is in rougher shape. It also displays no evidence of construction or maintenance, has vegetation growing into it, and is primitive route; not a road. Photopoint 33 was taken of the wilderness inventory road (BLM Route 7676), which is fenced (without a gate) just after the spot where this photograph was captured. Near Photopoint 33, an unmaintained way heads northeast into the unit (Photopoint 34). Although this unnamed way was constructed, it displays no signs of maintenance. As Photopoint 34 documents, this primitive route corridor is rather narrow and creosote bushes are growing into the way. This primitive route leads to some ranching infrastructure at New Olea Well. Photopoint 35 shows the condition of this primitive route past New Olea Well. Photopoint 36 was taken of a primitive route that leaves the way pictured in Photopoint 35. The way in Photopoint 36 contains no evidence of construction or maintenance, and has no clear purpose. Photopoint 37 shows another primitive route within the unit. Although this road was once bladed evidenced through old roadside berms, it has received no mechanical maintenance and does not meet the definition of a wilderness inventory road. The way in Photopoint 37 leads to an old mine that is no longer active. The farther one travels down the way pictured in Photopoint 35, the more rough and overgrown the way becomes. Photopoint 38 shows how this primitive route is growing in with perennial vegetation and is receiving very low use. Photopoints 39 and 40 show two more primitive routes in the area that are growing in with vegetation, serve no obvious purpose and should be left within the proposed LWC unit as ways. Photopoint 41 shows another primitive route that is even farther along with the process of becoming grown in with vegetation. Photopoint 42 depicts a way that was constructed using cut and fill, but has since fallen to disrepair, is not being maintained, and no longer appears to serve a clear purpose.

The powerline corridor is the Lower Burro Creek Proposed LWC unit boundary until it intersects with U.S. Highway 93. Just under a mile before Highway 93 becomes the LWC unit boundary, a route in the BLM route inventory data heads toward the unit. Photopoint 43 was taken outside of the LWC unit where this route crosses a wash. As the photograph depicts, the route has been washed out and is no longer passable except by the most extreme 4-WD vehicles. There is no evidence on the ground that

this route that eventually enters the unit is receiving any motor vehicle use beyond the washout. From this evidence combined with evidence presented with Photopoints 33 and 41, as well as from aerial photography, the AWC team has determined that all of the routes in the area between Photopoints 41 and 43 are primitive routes that are not being maintained and receive little to no vehicular use.

***Western Boundary***

Highway 93, the BLM property line, power lines and the associated utility right-of-way form the western Lower Burro Creek proposed LWC boundary. Waypoint 4 marks the location where Highway 93 and the associated right-of-way become the proposed LWC boundary. Continuing northwest on U.S. Highway 93 (wilderness inventory road), Photopoint 44 shows an old gravel pit, or utility staging area adjacent to the highway. This area has been reclaimed and fenced off; preventing vehicle access into the LWC unit. Heading north on Highway 93, the BLM route data shows several other routes leaving the highway and going into the Lower Burro Creek Proposed LWC unit. The BLM route inventory data says that these were all drawn using photo interpretation and need to be verified. The AWC inventory found that there are no ways to access any of these supposed routes, meaning that they are not wilderness inventory roads. U.S. Highway 93 is the proposed LWC bound until the BLM property line leaves the highway and extends due north. At this point, the BLM property boundary becomes the proposed LWC unit boundary. The property line is the unit boundary until a wilderness inventory road enters the unit and leads to a radio tower located on a hill above the highway. North of this road, the powerline once again becomes the unit boundary for approximately four-tenths of a mile. At this point, the BLM property line is the Lower Burro Creek Proposed LWC unit boundary for the remainder of the unit bound until returning to the starting point (Waypoint 1).

**SECTION 4: Photopoint Data**


**Data Tables & Photographs to accompany Maps and the Detailed Boundary & Routes Description**

Attributes	
Title	Photopoint 001
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	

**Photopoint 001. A primitive way entering the unit from the north.**




Google  
DigitalGlobe, USDA Farm Service Agency




N 34° 36' 24.35"  
W 113° 28' 08.84"      2877 ft      1/31/2015

Attributes	
Title	Photopoint 002
Unit name	Lower Burro Creek
Route name	BLM Route 7669
Determination	Road
Maintenance	As needed
Feature	Typical condition of Route/Way

**Photopoint 002. Powerline and associated wilderness inventory road are proposed LWC unit boundary.**




Google  
DigitalGlobe, USDA Farm Service Agency




N 34° 36' 52.32"  
W 113° 27' 03.75"      2894 ft      1/31/2015

Attributes	
Title	Photopoint 003
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	No evidence
Feature	Typical condition of Route/Way

**Photopoint 003. Looking southwest down a primitive route.**



Google  
DigitalGlobe, USDA Farm Service Agency



N 34° 36' 34.83"  
W 113° 26' 42.67"      2805 ft      1/31/2015



Attributes	
Title	Photopoint 004
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

**Photopoint 004. A primitive wash route in Kaiser Spring wash.**

Attributes	
Title	Photopoint 005
Unit name	Lower Burro Creek
Route name	NA
Determination	NA
Maintenance	NA
Feature	Natural community

**Photopoint 005. A unique grove of ocotillo in the LWC.**

Attributes	
Title	Photopoint 006
Unit name	Lower Burro Creek
Route name	NA
Determination	NA
Maintenance	NA
Feature	Flowing water

**Photopoint 006. Looking down a flowing drainage toward Hells Half Acre.**



**Attributes**

Title	Photopoint 007
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Revegetated

**Photopoint 007. A way heading south into the unit.**



**Attributes**

Title	Photopoint 008
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Revegetated

**Photopoint 008. The other end of the way displayed in Photopoint 7.**



**Attributes**

Title	Photopoint 009
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

**Photopoint 009. Looking southwest down a primitive wash route.**





Attributes	
Title	Photopoint 010
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Wash

**Photopoint 010. Another photo of the primitive wash route displayed in Photopoint 9.**



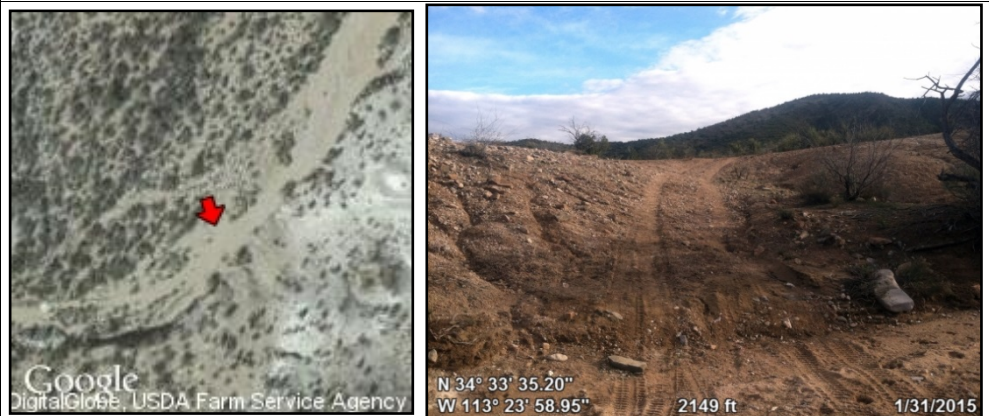
Attributes	
Title	Photopoint 011
Unit name	Lower Burro Creek
Route name	None
Determination	Not a route, just a wash
Maintenance	None
Feature	Wash

**Photopoint 011. Looking north up another wash.**



Attributes	
Title	Photopoint 012
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

**Photopoint 012. Looking south at a primitive way heading up a footslope out of the wash.**



**Attributes**

Title	Photopoint 013
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Fence

**Photopoint 013. Fence across wash ends vehicular use.**



**Attributes**

Title	Photopoint 014
Unit name	Lower Burro Creek
Route name	None
Determination	Not a route, just a wash
Maintenance	None
Feature	No use

**Photopoint 014. The most likely place where vehicles would exist the wash, pictured in Photopoint 11, if the wash was being used by vehicles.**



**Attributes**

Title	Photopoint 015
Unit name	Lower Burro Creek
Route name	None
Determination	Road
Maintenance	Recent blade
Feature	Windmill

**Photopoint 015. A short spur road leading to ranching infrastructure off of BLM Route 7666.**





Attributes	
Title	Photopoint 016
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Reclaimed mine

**Photopoint 016. Looking south toward a reclaimed mining area. The area, within the Clay Hills ACEC, has been closed to vehicles.**



Attributes	
Title	Photopoint 017
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Leads to old mine

**Photopoint 017. Looking toward an old mine.**



Attributes	
Title	Photopoint 018
Unit name	Lower Burro Creek
Route name	None
Determination	Road
Maintenance	Bladed, not recently
Feature	Leads to old mine

**Photopoint 018. Facing west toward an old mine.**





**Attributes**

Title	Photopoint 019
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Ends at campsite

**Photopoint 019. Condition of way leading to primitive campsite near Burro Creek.**



**Attributes**

Title	Photopoint 020
Unit name	Lower Burro Creek
Route name	NA
Determination	NA
Maintenance	NA
Feature	Interesting geology

**Photopoint 020. Amazing Precambrian granitic/gneissic gorge along Burro Creek.**



**Attributes**

Title	Photopoint 021
Unit name	Lower Burro Creek
Route name	NA
Determination	Way
Maintenance	None
Feature	Large camping area

**Photopoint 021. Heavily used social camping area at Six Mile Crossing.**



Attributes	
Title	Photopoint 022
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

**Photopoint 022. A primitive route heading down a wash into the LWC unit.**

The left image is a satellite view from Google Earth showing a dirt path winding through a desert landscape, with a red arrow pointing to the path. The right image is a ground-level photograph of a dirt road in a wash, showing reddish soil and sparse vegetation. The ground-level photo includes the following data: N 34° 31' 09.11", W 113° 19' 46.42", 2969 ft, and 2/2/2015.

Attributes	
Title	Photopoint 023
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Erosion and encroaching vegetation

**Photopoint 023. A lack of maintenance has lead to erosion.**

The left image is a satellite view from Google Earth showing a dirt path with a red arrow pointing to an area of erosion. The right image is a ground-level photograph of a dirt road showing significant erosion and encroaching vegetation. The ground-level photo includes the following data: N 34° 31' 33.74", W 113° 20' 19.84", 3022 ft, and 2/2/2015.

Attributes	
Title	Photopoint 024
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

**Photopoint 024. Location where road intersects Bonanza Wash.**

The left image is a satellite view from Google Earth showing a dirt path with a red arrow pointing to an intersection. The right image is a ground-level photograph of a dirt road intersecting a wash, showing a dirt barrier across the path. The ground-level photo includes the following data: N 34° 31' 43.02", W 113° 21' 06.01", 2677 ft, and 2/2/2015.



**Attributes**

Title	Photopoint 025
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Reclaimed
Maintenance	None
Feature	Revegetating

**Photopoint 025. This is not a road or a way.**



**Attributes**

Title	Photopoint 026
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Reclaimed
Maintenance	None
Feature	Revegetating

**Photopoint 026. This old way is revegetating.**



**Attributes**

Title	Photopoint 027
Unit name	Lower Burro Creek
Route name	None
Determination	Wash
Maintenance	None
Feature	Typical condition of wash

**Photopoint 027. Bonanza Wash.**



**Attributes**

Title	Photopoint 028
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Campsite

**Photopoint 028. Way leading to camping area.**



**Attributes**

Title	Photopoint 029
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Low use

**Photopoint 029. A primitive wash route going into the proposed LWC unit.**



**Attributes**

Title	Photopoint 030
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

**Photopoint 030. A way that heads east into the unit.**





Attributes	
Title	Photopoint 031
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Leads to water tank and corral

**Photopoint 031. An unmaintained way leading to a cattle tank & corral.**

Attributes	
Title	Photopoint 032
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Vegetation in center of way

**Photopoint 032. A primitive route within the Lower Burro Creek LWC.**



Attributes	
Title	Photopoint 033
Unit name	Lower Burro Creek
Route name	BLM 7676
Determination	Road
Maintenance	None
Feature	Typical condition of Route/Way

**Photopoint 033. Wilderness inventory road & utility access.**



Attributes	
Title	Photopoint 034
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Road
Maintenance	None
Feature	Livestock Watering/Feeding station

**Photopoint 034. Cherrystem leading to New Olea Well.**






Google  
DigitalGlobe, USDA Farm Service Agency

N 34° 30' 52.35"  
W 113° 22' 31.27" 2772 ft 2/1/2015

Attributes	
Title	Photopoint 035
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

**Photopoint 035. Primitive route with lots of vegetation growing into it.**






Google  
DigitalGlobe, USDA Farm Service Agency

N 34° 31' 13.62"  
W 113° 22' 22.47" 2825 ft 2/1/2015

Attributes	
Title	Photopoint 036
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

**Photopoint 036. Way that is revegetating.**

Google  
DigitalGlobe, USDA Farm Service Agency

N 34° 31' 16.47"  
W 113° 22' 24.23" 2805 ft 2/1/2015



**Attributes**

Title	Photopoint 037
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

**Photopoint 037. Primitive route that leads to inactive mine.**



**Attributes**

Title	Photopoint 038
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

**Photopoint 038. Primitive route displaying low use and revegetation.**



**Attributes**

Title	Photopoint 039
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Revegetating

**Photopoint 039. Primitive way with no apparent purpose.**





**Attributes**

Title	Photopoint 040
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Reclaimed
Maintenance	None
Feature	Revegetating

**Photopoint 040. Primitive route with no evidence of use.**



**Attributes**

Title	Photopoint 041
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Reclaimed
Maintenance	None
Feature	Revegetating

**Photopoint 041. Primitive way has almost disappeared.**



**Attributes**

Title	Photopoint 042
Unit name	Lower Burro Creek
Route name	Not Named
Determination	Reclaimed
Maintenance	None
Feature	Revegetating

**Photopoint 042. This way receives no use and has almost grown in.**





**Attributes**

Title	Photopoint 043
Unit name	Lower Burro Creek
Route name	None
Determination	Way
Maintenance	None
Feature	Erosion

**Photopoint 043. Route is impassable due to severe washout.**



**Attributes**

Title	Photopoint 044
Unit name	Lower Burro Creek
Route name	Utility ROW
Determination	Reclaimed
Maintenance	Old evidence
Feature	Closure point

**Photopoint 044. All ways entering the unit in this area are closed by fencing.**

