Proposed Lands with Wilderness Characteristics:

Joshua Tree Forest



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



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Prepared by:

Joseph M. Trudeau &

Amber R. Fields



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Cover Photo: The Grand Wash Cliffs at sunset from the southwestern corner of the proposed LWC.

All photos by the authors unless otherwise noted.

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 Kingman Resource Area of northwestern 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 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.

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

¹Memorandum 2011-154 is available online at:

² Manual 6310 is available online at :

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

<u>Sufficient roadless area to satisfy size requirements</u> (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

<u>Affected primarily by the forces of nature</u> – 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.

<u>Human impacts</u> – 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.

<u>Outside human impacts</u> – 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.

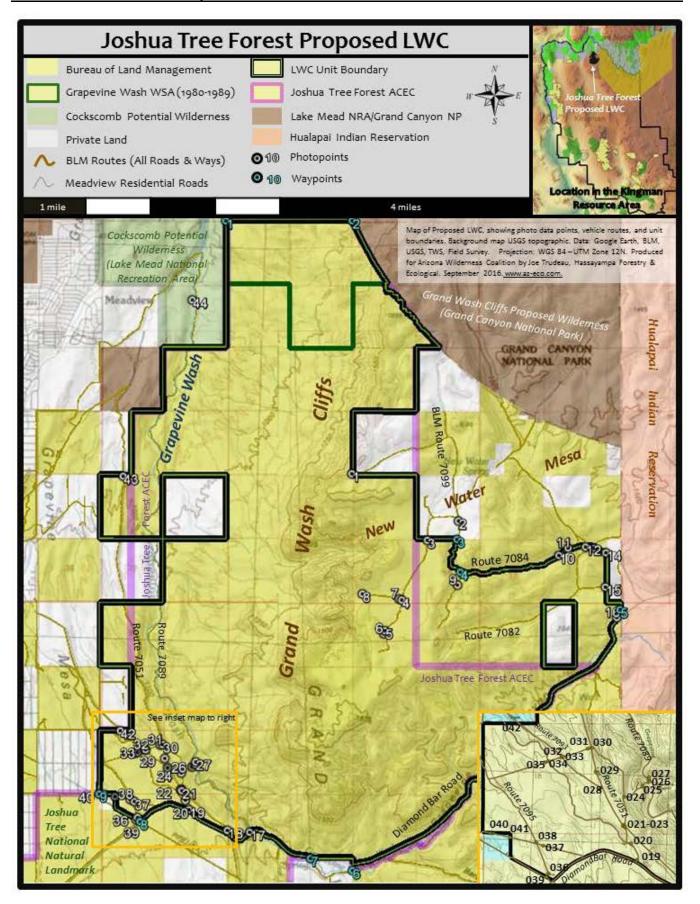
What does Manual 6310 require for the identification of the boundaries of an LWC?

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: Joshua Tree Forest Proposed Lands with Wilderness Characteristics



SECTION 1: General Overview

Unit Location

The Joshua Tree Forest Proposed LWC encompasses 31,767 acres in the extreme northeastern corner of the Kingman Resource Area, directly east of the small community of Meadview, south of Lake Mead National Recreation Area (NRA), and west of the Hualapai Indian Reservation. The Grand Wash Cliffs are an immense feature that dominates the eastern horizon from Meadview and Diamond Bar Road.

Brief Boundary Description

The boundary of the proposed LWC follows wilderness inventory roads and BLM property lines. From the southwestern corner at waypoint 8 on the included map, the southwestern boundary follows a water pipeline. Then western boundary follows the property line between BLM and private land for six sections to the north from waypoint 9. The northwestern to northern boundaries follow six miles of property line between BLM land and Lake Mead NRA. The northern to northeastern boundaries follow approximately two miles of property line with Grand Canyon National Park and a small parcel of private land. The eastern boundary follows the division between BLM and private land until meeting and following several wilderness inventory roads (BLM Route 7099, BLM Route 7084, and BLM Route 7097) and a small piece of private property. The southern boundary follows Diamond Bar Road and the property line between BLM land and Grand Canyon Ranch.

Two inholdings occur within the perimeter of the proposed LWC:

- 1) Township 30 North, Range 16 West, Section 29 is a full section of ~640 acres. It is situated at the western edge of the unit and is an extension of the checkerboard land ownership pattern surrounding the community of Meadview. There are no vehicle access routes into this parcel and it is currently uninhabited and undeveloped, although it has been subdivided into 517 lots of 0.42 to 1.25 acres.
- 2) Township 29 North, Range 15 West, west half of section 5, is a private parcel of ~320 acres. It is located in the eastern lobe of the proposed LWC approximately 1.6 driving miles from Diamond Bar Road. Access is gained by way of BLM Routes 7097 and 7082. The property is currently uninhabited and undeveloped, although it is subdivided into approximately 228 lots ranging from 1.25 to 10 acres.

Because there are no improvements to the properties, no road maintenance has occurred to ensure regular and continuous use, and there were no signs of active development at the time of our inventory, we have not cherrystemmed to these properties because they may never be developed.

Landforms & Biological Communities

The proposed LWC contains some of the most dramatic scenery and vertical relief in the Kingman Resource Area. The Grand Wash Cliffs, which cut through the center of the unit from north to south, divide the unit between New Water Mesa (which is part of the Colorado Plateau Ecoregion) from Grapevine Wash (which is part of the Mohave Desert Ecoregion; ecoregions discussed in Supplemental Values section). These immense cliffs form an escarpment that runs for about 100 miles from the remote Shivwits Plateau on the Arizona Strip, to Truxton Wash, where the Cottonwood Mountains form.

The geology of this unit is generally representative of the Colorado Plateau in Northern Arizona. The majority of New Water Mesa is the widespread Redwall Limestone, a grey-to tan deposit formed during periods of sea-inundation around 350 million years ago, and exposed throughout the region and as far north as southern Montana. The Grand Wash Cliffs expose the evidence of millions of years of seas rising and falling. The edge of the Colorado Plateau is in constant retreat, and this erosion produces vast amounts of material. The slopes below the cliffs, as well as the parallel ridges and drainages associated with Grapevine Wash, consist of eons of erosion-generated valley fill sediments, sandstones, conglomerates, and mudstones (Arizona Geological Society, 2000).

Vegetative composition differs greatly within this unit, again, along the Grand Wash Cliffs. New Water Mesa is classified as Great Basin Conifer Woodland biotic community. Ecological Types occurring in this community include Pinyon-Juniper Woodlands interspersed with Intermountain Basins Big Sagebrush Shrubland, Inter-Mountain Basins Semi-Desert Shrub Steppe, and small patches of Mogollon Chaparral. Drainages on New Water Mesa are beautiful, broad valleys supporting Inter-Mountain Basins Semi-Desert Grasslands that provide critical habitat for pronghorn. The cliff faces and slopes that fall away towards Grapevine Wash support Ecological Types found in Mohave Desertscrub Biotic Communities that transition from Pinyon-Juniper Woodlands to Mojave Mid-Elevation Mixed Desert Scrub, where the iconic Joshua tree grows in profusion. The bluffs and rolling hills of Grapevine Mesa, and the many gravelly washes on the western half of the unit consist of Sonora-Mojave Creosotebush-White Bursage Desert Scrub, becoming hotter and drier as the land slopes towards Lake Mead (USGS, 2015).



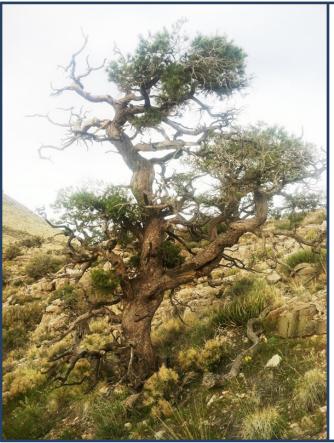
"The Joshua Tree Forest-Grand Wash Cliffs area contains a large, spectacularly scenic stand of Joshua trees set against a dramatic backdrop provided by the escarpment of the Grand Wash Cliffs. This area is unique in the planning area and is considered by many to be one of the best representations of Joshua tree/blackbrush associations in the Southwest. The area provides outstanding opportunities for dispersed recreation" (BLM, 1993: p. 75).

Previous Wilderness Inventories

The proposed LWC has not been inventoried for wilderness character since the 1979/1980 intensive inventory process conducted by BLM. At that time, almost the entire study area was still a checkerboard of BLM and private ownership. In that review, the BLM identified 2,200 acres of land contiguous with proposed wilderness in Lake Mead NRA, saying that:

"The entire unit is natural with no evidence of man's activities. Taken by itself, the unit lacks opportunities for outstanding solitude and primitive and unconfined recreation. The unit is contiguous, though, to large tracts of lands that do offer outstanding opportunities, and contributes to those opportunities. Since the unit is adjacent to a National Park Service wilderness proposal and is also a natural extension of a significant natural feature, the Grand Wash Cliffs, we propose the entire unit undergo wilderness study" (BLM, 1980a: p. 73)

While we disagree with the notion that this terrain lacks opportunities for solitude and primitive recreation, we applaud the BLM for recognizing its material contribution to the larger landscape. The BLM ultimately designated "Unit # AZ-020-014 - Grapevine Wash" as a Wilderness Study Area (BLM, 1980c), but later returned it to multiple use management (BLM, 1989). In the 25 years since then, the BLM has consolidated its ownership and 'blocked up' significant portions of the Grand Wash Cliffs within the proposed LWC, as well as tens of thousands of acres south of Diamond Bar Road. Because of this consolidation, resulting in a nearly 1500% growth in contiguous BLM lands, we believe the opportunities for solitude and primitive recreation in a very natural, nearly pristine setting are now exceptional.



The Joshua Tree Forest Proposed LWC features diverse vegetation indicative of the Colorado Plateau and the Mohave Desert.

The windswept Grand Wash Cliffs are home to countless centuries-old pinyons and junipers that have survived fire, ice, relentless sun, and the damages of wildlife and livestock. This pinyon pine, near photopoint 8, recently survived yet another fire, which swept up the steep slopes form the desert plains below.

We aged a dominant pinyon pine in the stand above the rim, near photopoint 4, and determined the tree, and hence the stand, to be over 325 years old. The proposed LWC provides an opportunity for the protection of thousands of acres of old growth conifer, Joshua tree, Mohave yucca, and black brush woodlands, all of which are susceptible to altered fire regimes, caused by the spread of invasive grasses and the careless ignitions of humans, often during motorized recreation.

SECTION 2: Wilderness Characteristics

The proposed LWC meets the minimum size criteria for roadless lands

The Joshua Tree Forest Proposed LWC encompasses 31,767 acres of contiguous BLM lands.

The proposed LWC is affected primarily by the forces of nature

The Joshua Tree Forest Proposed LWC is set in a breathtaking landscape dominated primarily by natural forces. There are only three categories of human impacts within the unit: primitive routes, minimal ranch infrastructure, and a single water catchment along the edge of the unit; all of which are substantially unnoticeable when considering the vastness of the landscape.

Primitive Routes

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. Many of the routes on Grapevine Mesa are narrow ATV tracks (see photopoints 19-42). According to the Friends of the Joshua Tree Forest, "the networks of hiking trails of five or so years ago have morphed into ATV trails of four to seven feet wide. BLM officials refer to this change as "spidering," and point out that all current roads in the ACEC are considered "motorized," so these changes are inevitable"³. Because of the importance of these unique plant communities and their sensitivity to human impacts, and because the current condition is so very natural, it is critical that BLM consider management actions, such as LWC designation, that can curtail the spidering of routes about which the local Friends organization is registering concern.

Ranch Infrastructure

The area within the proposed LWC is minimally affected by ranch infrastructure and appears to be affected primarily by the forces of nature. We did not observe much ranch activity occurring within the proposed LWC and no cattle were observed at any point during the field inventory. A single well was encountered along Grapevine Wash at photopoint 26. The windmill was in disrepair, but a single solar panel was running the pump and filling a watering trough. If this is currently a functioning well as part of a properly leased grazing permit, we propose that access to the well be granted by horseback, or by administrative use permissions following Grapevine Wash from Diamond Bar Road.

Wildlife Water Catchments

Arizona Game and Fish Department has installed one water catchment in the unit. Music Mountains #6 is 500 feet north of photopoint 9. 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, this one does not substantially affect the unit's naturalness.

Summary of Human Impacts

Collectively, the human influences documented above are not substantially noticeable to the average visitor. This wild landscape would not exist were it not for the incredible forces of nature that created it, and these natural forces continue to be its most dominant form of influence. The few human impacts that do exist within proposed LWC are considered to not be substantially noticeable according to the indicators laid out in BLM Manual 6310.

³ http://joshuatreeforest.org/about-the-joshua-tree-forest/threats-to-the-forest/ Arizona Wilderness Coalition Page **9** of **33**

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

The Joshua Tree Forest Proposed LWC provides abundant opportunities for both solitude and primitive and unconfined recreation. The higher elevations within the proposed LWC offer recreationists an unusual environment to explore with a unique mixture of vegetation types because of the joining of several different plant communities. This unit contains the most northerly population of Joshua Trees and is one of only a few locations where Joshua Trees can be found among Colorado Plateau species. It is so unique to see Joshua Trees on what feels like the south rim of the Grand Canyon.

The terrain found within the proposed LWC is perfect for finding solitude. There are numerous secluded canyons to explore in complete privacy. Atop the rim of the mesa, there are pinyon pine and juniper woodlands that include Joshua trees. These forests offer high-quality vegetative screening for campers and recreationists looking for seclusion. Additionally, Grapevine Wash in the western part of the proposed LWC offers solitude from the outside world due to its lower elevation surrounded by rolling hills to the west and soaring cliffs to the east. Indeed, these opportunities for solitude within the Joshua Tree Forest Proposed LWC are outstanding due to the dramatic topography, spectacular views and stunning biology found within the unit.

There are outstanding opportunities to enjoy primitive and unconfined recreation within the Joshua Tree Forest Proposed LWC. Amazing campsites can be found along the edge of the mesa at the higher elevations within the unit. These campsites have incredibly vast views looking to the north toward Lake Mead, the Colorado River and the Colorado Plateau. Hikers and backpackers can enjoy tough cross country routes through challenging terrain. Naturalists and foragers are sure to find unusual combinations of plants and animals due to the overlapping of natural communities present within the unit. The cliffs along the west edge of the mesa provide for difficult and risky rock climbing for the more daring climber. The scenic value present in this proposed LWC are top-notch; this is an absolutely stunning landscape to hike, camp, horsepack, or just sit back and look at.

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

The proposed LWC would protect portions of an Area of Critical Environmental Concern (ACEC)

ACEC's are special designation lands that have been identified to help protect special status plants, wildlife, cultural sites, spectacular scenery, and riparian areas. The Joshua Tree Forest-Grand Wash Cliffs ACEC (shown on maps) protects 39,060 acres of unique vegetation, outstanding scenic values, rare cultural resources (including large prehistoric roasting pits from several eras of human occupation), and it protects important peregrine falcon aeries and open hunting habitat (BLM, 1993). Approximately 26,000 acres of this ACEC overlap with the proposed LWC.

The proposed LWC is contiquous with two National Park Service Recommended Wilderness units

The northern and northwestern boundaries of the Joshua Tree Forest Proposed LWC are contiguous with the **Cockscomb Recommended Suitable Wilderness in Lake Mead National Recreation Area**.

This 14,484 acre unit protects the scenic background for the Virgin Basin section of Lake Mead, encompassing the lower reaches of Grapevine Wash as it descends into Lake Mead (USDI, 1979).

Arizona Wilderness Coalition Page **10** of **33** Trudeau & Fields, 2015

The northeastern boundary of the proposed LWC is contiguous with **Grand Wash Cliffs Proposed Wilderness in Grand Canyon National Park**. This 23,078 acre unit contains almost eight miles of the Grand Wash Cliffs, a 2000-3000 foot tall escarpment that is generally considered the end of the Grand Canyon. This unit encompasses the entirety of the National Park area between the Colorado River, the Hualapai Indian Reservation, and the Cockscomb unit of Lake Mead NRA (USDI, 1993).

The proposed LWC shares five miles of uninterrupted contiguity with the Cockscomb Unit, and almost two miles of uninterrupted contiguity with the Grand Wash Cliffs Unit. These roughly 6.75 miles of contiguity with proposed wilderness areas amply affirm that the wilderness characteristics within those units are also present in the proposed LWC. Furthermore, protection of the proposed LWC would further enhance those values present in the Cockscomb and Grand Wash Cliffs Proposed Wilderness.

The proposed LWC borders the Grapevine Mesa Joshua Tree Forest National Natural Landmark

This Landmark, which contains the densest stand of mature Joshua Trees in Arizona, covers 3,200 acres of private and BLM lands to the southwest of the Joshua Tree Forest Proposed LWC. The landmark was designated by the Secretary of the Interior in 1967 after a determination that the area possessed national significance as defined in 36 CPR 62.5, National Landmark Criteria (BLM, 1993: p. 97).

The residents of Meadview have organized an advocacy organization, Friends of the Joshua Tree Forest, to advance protective and restorative measures to maintain and enhance the Joshua Tree forest both within the Landmark and throughout the ACEC in general. The group has identified ATV's, mining and subdivisions as the primary threats to the Joshua tree forest. The group has participated in trash clean-ups, revegetation projects, managing invasive species, and maintaining trails.

"Numerous threats challenge this special forest. Development of the Grand Canyon Skywalk, a dude ranch, several helicopter tour companies, and the construction of a straight, modern highway to replace Diamond Bar Road are drawing increasing numbers of visitors to this captivating area. Now is the time for good decisions to be made to ensure the area's future appeal. The almost unbroken sea of Joshua Trees, now visible from Diamond Bar Road as the visitor approaches the Grand Canyon, is an important scenic component of an introduction to this area, and should be preserved" (http://joshuatreeforest.org/).



Looking across Grapevine Wash towards the Grand Wash Cliffs from photopoint 43

The proposed LWC was identified as a priority conservation area by The Nature Conservancy

The Nature Conservancy (TNC) is an international conservation organization dedicated to preserving life in all of the earth's ecosystems. The organization takes a scientific approach to prioritizing conservation work to achieve the most effective species and habitat protection outcomes. Their approach involves identifying conservation focus areas in each ecoregion, based on collaborative, multi-disciplinary based determinations of at-risk species and habitats, threats to ecosystem health, and effective solutions to maintain biodiversity and ecosystem resiliency. The proposed LWC straddles the boundary of two major Ecoregions, with the Grand Wash Cliffs being the landform that defines the regional boundaries. The Colorado Plateau Ecoregion is to the east, encompassing 48.5 million acres, and the Mohave Desert to the west, encompassing 32 million acres. TNC completed ecoregional assessments of both regions using advanced GIS and statistical computing tools to identify a network of conservation areas where the most imperiled, keystone, or endemic ecosystems, species, and habitats, as well as representative components of the regions native biodiversity could be protected with the least effort. The Joshua Tree Forest Proposed LWC is included in three separate priority conservation areas (Marshall et al., 2004; Tuhy et al., 2002; The Nature Conservancy, 2001).

In the Conservation Assessment of the Colorado Plateau Ecoregion, TNC identified 107 conservation areas totaling 17.6 million acres that can meet conservation goals through proactive biodiversity conservation management practices. One of these areas, "Colorado Plateau Ecoregion Site #42 — Hualapai West", encompasses 122,300 acres along the Grand Wash Cliffs. Approximately 24,000 acres of the proposed LWC are included within the conservation area (see purple-shaded area on map on next page). This area was identified because of its potential for effective conservation of scrub, woodland, and chaparral terrestrial ecological systems; intermittent and perennial headwaters; and peregrine falcon (Falco peregrinus) habitat. Key threats to these values in this area are fire regime

Also in that assessment, approximately 800 acres of the proposed LWC, consisting of the northeastern corner of the unit, adjacent Grand Canyon National Park, were included in the conservation focus area identified as "Colorado Plateau Ecoregion Site #41 – Grand Canyon" (see turquoise-shaded area on map on next page). This 1.85 million acre area includes much of the National Park, and some adjacent lands, and is priority area for the conservation of a huge variety of ecosystems, plants, mammals, birds, amphibians, reptiles, invertebrates, and fish.

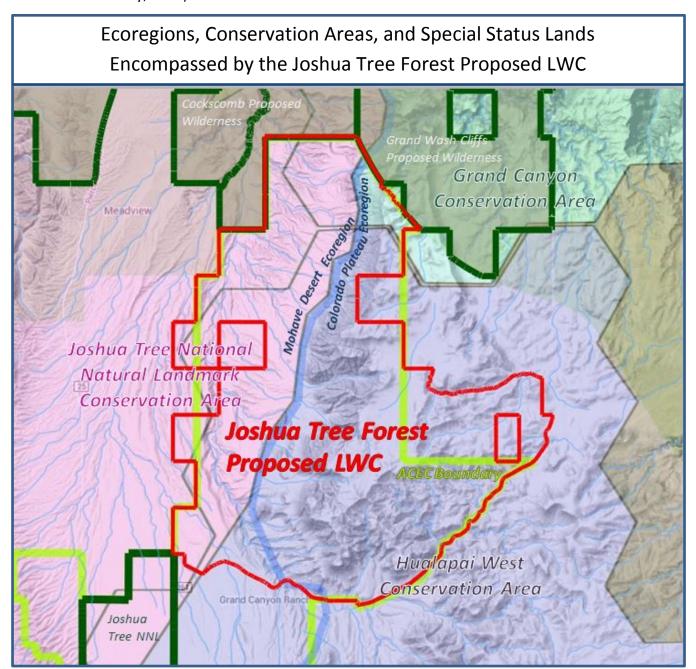
alteration and vehicles, roads, and recreation (Tuhy et al., 2002).

protection in this area is much greater than what occurs in the 800 acres of the proposed LWC, but that is not to detract from the contribution that this pristine landscape makes to the entire Grand Canyon ecosystem (Tuhy et al., 2002).

The range of species that might benefit from enhanced

This Joshua tree, near photopoint 8, was top-killed by a fire decades ago, and then re-sprouted. Today's fires, carried by excessive fuel loads of invasive grasses, are more likely to kill Joshua trees.

A separate study of the Mohave Desert recognized roughly 217,650 acres of the White Hills-Hualapai Wash-Grapevine Wash area as an important conservation focus area identified as the **Joshua Tree National Natural Landmark Conservation Area**. Approximately 11,000 acres of this focus area are included within the proposed LWC, encompassing the rolling slopes and ridges below the Grand Wash Cliffs (see pink-shaded area on map below). This area is important for the conservation of many terrestrial ecosystems, such as blackbrush-scrub, creosote bush, desert grassland, Joshua Tree woodland, and other scrub/chaparral types; as well wildlife such as banded Gila monster (*Heloderma suspectum cinctum*), pale Townsend's big eared bat (*Plecotus townsendii pallescens*) and generally quality bat habitat; and for plants such as Utah sandpaper bush (*Mortonia scabrella* var. *utahensis*), silverleaf sunray (*Enceliopsis argophylla*), and Las Vegas bearpoppy (*Arctomecon californica*) (The Nature Conservancy, 2001).



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SECTION 3: Detailed Boundary & Routes Description

Narrative Description of the Proposed LWC Boundary

This section of the report provides a detailed boundary description for the Joshua Tree Forest 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 Joshua Tree Forest Proposed LWC unit contains 31,767 contiguous roadless acres, with relatively few primitive routes permeating the unit boundary. The Photopoints described here of the Joshua Tree Forest 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 LWC unit bound is the BLM property boundary. From Waypoint 1 (northwest unit corner), the Joshua Tree Forest Proposed LWC unit boundary is the BLM property line all the way to Waypoint 2.

Eastern Boundary

The BLM property line and several wilderness inventory roads act as the eastern Joshua Tree Forest Proposed LWC boundary. The BLM property line serves as the LWC boundary from Waypoint 2, as the property line turns to the southeast. The BLM property line continues to be the LWC unit boundary as it heads to the southwest in a series of steps. At Photopoint 1, a primitive route enters the proposed LWC unit for a very short distance. Photopoint 1 was taken at the viewpoint that this primitive route leads to. The primitive route contains no evidence of construction; no evidence of maintenance; and appears to be kept open solely by the passage of vehicles. Therefore, this is a way, not a road, as defined by BLM Manual 6310. Photopoint 2 shows the way (BLM Route 7099) that this primitive route stems from (outside of the proposed LWC), and the condition that it is in. As Photopoint 2 illustrates, this way (BLM Route 7099) does not appear to be maintained; evidenced by the deep ruts shown in the photo. In fact, BLM Route 7099 seems to be maintained solely by the passage of vehicles, which also makes it a way, not a road.

From Photopoint 2, the BLM property line remains the proposed LWC unit boundary. Photopoint 3 depicts a way as it enters the Joshua Tree Forest Proposed LWC unit. This unnamed way appears to be

maintained solely by the passage of vehicles. This way contains no evidence that it was constructed; no sign of mechanical maintenance; and ends at an out-of-service water catchment. The fine soils found in this area are highly susceptible to wind-blown erosion with vehicle use. If the dilapidated infrastructure were to be removed, and the route closed to vehicle traffic; the woodland basin could be restored to a more wild and pristine nature. Photopoint 4 was taken of the same primitive route farther south. This photo serves as further evidence that this way is not receiving maintenance. Much of the way is significantly eroded. There is a parallel old primitive route that washed out, and the currently used track is on its way to the same state. Photopoint 5 was taken farther south along this route. Photopoint 5 depicts a dilapidated water catchment tank. Photopoint 6 was taken just past this unused infrastructure and shows yet another photograph of this unmaintained way. Photopoint 7 displays a primitive route stemming to the west of the previously described way. Photopoint 7 shows that there is no evidence of construction of this way, and it is not being maintained. This primitive route ends at a campsite and a view towards Lake Mead (Photopoint 8).

Returning to the Joshua Tree Forest Proposed LWC boundary, the BLM property bound is the unit boundary until Waypoint 3. At Waypoint 3, BLM Route 7099 becomes the proposed LWC unit boundary. At Waypoint 4, the LWC boundary route changes names from BLM Route 7099, and becomes BLM Route 7084. Photopoint 9 depicts a primitive route (BLM Route 7099) that enters the LWC unit at Waypoint 3. This way leads to an Arizona Game and Fish wildlife water catchment that is about a quarter-mile from BLM Route 7084. As Photopoint 9 displays, this way has no evidence of construction; is not being maintained other than by the passage of vehicles; and has no purpose once it passes the water catchment. Consequently, this is a primitive route, not a road as defined by BLM Manual 6310.

BLM Route 7084, a wilderness inventory road, acts as the LWC boundary in this area. Photopoint 10 shows an image of BLM Route 7084. Photopoint 11 shows another image of the wilderness inventory road. Photopoint 11 displays an image of a user-created bypass of a recently washed out gully along BLM Route 7084. Heavy winter rains have damaged some sections of the road, but if appears to have been bladed at some point within the last couple of years. Photopoint 12 shows an image of BLM Route 7084 near where it originates. Traveling east from Photopoint 12, the wilderness inventory road is BLM 7097. Photopoint 13 depicts a primitive route stemming from the wilderness inventory road. As Photopoint 13 shows, this way contains no apparent evidence of construction; is not being maintained; has no obvious purpose; and is therefore a way, not a road. Photopoint 14 was taken at a LWC unit corner, where the unit boundary turns to the south. Photopoint 14 shows BLM Route 7097, a wilderness inventory road, where is becomes the unit boundary. Traveling south from Photopoint 14, the BLM property line becomes the Joshua Tree Forest Proposed LWC unit boundary. At Photopoint 15, depicts a way (BLM Route 7082) as it enters the LWC unit. This way has no evidence of construction; does not appear to be maintained; and has no obvious purpose. From Photopoint 15, the LWC unit bound is the BLM property line until Waypoint 5.

Southern Boundary

The Diamond Bar Road forms most of the proposed southern LWC boundary with short sections being another wilderness inventory road and the BLM property boundary. At Waypoint 5, BLM Route 7097 becomes the LWC unit bound for just under a quarter-mile. Photopoint 16 was taken along this section of this wilderness inventory road. Just south of Photopoint 16, BLM Route 7024 (Diamond Bar Road) becomes the Joshua Tree Forest Proposed LWC unit boundary.

BLM Route 7024 is the LWC unit boundary for roughly six miles until Waypoint 6. The BLM property line is the LWC unit bound between Waypoint 6 and Waypoint 7. At Waypoint 7, BLM Route 7024 (Diamond Bar Road) becomes the Joshua Tree Forest Proposed LWC unit bound once again. Photopoint 17 was taken looking down a primitive route (BLM Route 7089) in a dry wash. The way displayed in Photopoint 17 shows no evidence of construction or maintenance; other than a disturbed area adjacent to where a road crew is working on the bridge that goes over this wash. From Photopoint 17, the LWC unit boundary is continues to be BLM Route 7024 (Diamond Bar Road). Then BLM Route 7051 branches off heading to the northwest. Although the first couple hundred feet of BLM Route 7051 were recently bladed; this is due to the construction work on Diamond Bar Road. Photopoint 18 shows that this primitive route (BLM Route 7051) contains no evidence of construction; is not maintained; appears to get only OHV use; has no clear purpose; and is probably kept open only by the passage of vehicles. As a result, BLM Route 7051 is a way, not a wilderness inventory road as defined by BLM Manual 6310.

Continuing northwest on the wilderness inventory road (BLM Route 7024), another primitive route (Photopoint 19) stems off to the northwest. Photopoint 19 is an unnamed tertiary route which has no evidence of construction or maintenance; making it a way, not a road. Photopoint 20 displays an image of a user-created way that was not constructed, and has never been maintained. As the image depicts, this primitive route was most likely created by ATV or dirt bike users that have trampled the vegetation to access the wash. Photopoint 21 is another image of BLM Route 7051, and serves as further proof that this way is not being maintained. Photopoints 22-35 display images of primitive routes branching from or around BLM Route 7051. Most of these ways show no evidence of construction; none of these ways are being maintained; some of these ways are heavily eroded; and many of these ways are revegetating. Consequently, all of these ways are primitive routes, not roads as defined by BLM Manual 6310.

Returning to the Joshua Tree Forest Proposed LWC unit bound which is BLM Route 7024 (Diamond Bar Road), the LWC unit boundary turns to the northwest and becomes an unnamed road (pictured in Photopoint 38) at Waypoint 8. Photopoint 36 was taken looking northwest up a primitive route (BLM Route 7095), which does show evidence of construction, but not maintenance. BLM Route 7095 is kept open solely by the passage of vehicles, is revegetating, and is hardly used. Photopoint 37 depicts an image of a way that was constructed; is not being maintained; has no use after about 200 feet; is eroding and revegetating; is no longer a "through-route"; and the entrance is fenced off at Diamond Bar Road. Therefore, the way shown in Photopoint 37 is a primitive route, not a road. Photopoint 38

displays an image of an old primitive route (BLM Route 7095). This old way was constructed, but is obviously not being maintained. As Photopoint 38 displays, this old primitive route shows no evidence of use, and has been reclaimed by nature.

Returning to the LWC unit bound, Photopoint 39 shows an unnamed road (wilderness inventory road). The road in Photopoint 39 was constructed; shows old evidence of maintenance; and is also a waterline. Because a waterline follows this road, it is likely to be maintained in the future. Continuing on, the BLM property line serves as the proposed LWC unit bound heading north. Photopoints 40 and 41 display images of a primitive route that enters and exits private land, going onto BLM land. As the images show, this way was constructed, but appears to be maintained solely by the passage of vehicles; making it a way, not a road.

Western Boundary

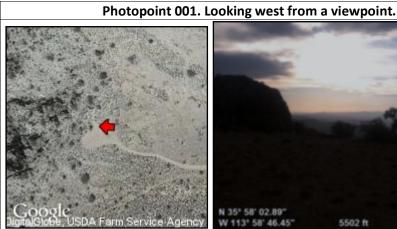
The entire western boundary of the Joshua Tree Forest Proposed LWC is made up of the BLM property line. From Waypoint 9, the proposed LWC unit boundary turns to the north for one mile, and then turns to the east again. Photopoint 42 was taken looking southeast down a primitive route (BLM 7093). Photopoint 42 shows that this way was constructed, but has not been maintained. The way was probably constructed more than 50 years ago; bulldozed to about 20 feet wide. It has since grown in to a six to eight foot wide track, which is kept open solely by the passage of vehicles. The encroaching vegetation is as old as the vegetation outside of the original route; indicating that this way has not been mechanically maintained.

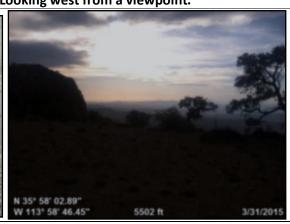
From Photopoint 42, the Joshua Tree Forest proposed unit boundary is the BLM property line as it continues north. Photopoint 43 was taken looking south into the LWC unit on a primitive route (BLM Route 7051). As was documented farther to the south, BLM Route 7051 was constructed, but presents no evidence of mechanical maintenance, meaning that it is a way, not a road. Continuing north along the BLM property line/LWC unit bound, Photopoint 44 depicts a primitive wash route on National Park Service land that eventually leads to BLM Route 7089. Photopoint 44 serves as evidence that this way was not constructed; is not being maintained; and is a primitive route, not a road, as defined by BLM Manual 6310. As of April, 2015, the NPS portion of this way does not reach BLM land because of rough conditions resulting from recent flash flooding that has majorly reshaped the wash. All vehicular use is scattered through the wide, braided wash among boulders and shredded vegetation. Furthermore, this route is closed to motorized travel on the National Recreation Area, therefore the BLM should at a minimum close the portion of Route 7089 south of Grapevine Windmill. The BLM property line continues to be the Joshua Tree Forest Proposed LWC unit boundary continuing north all the way back to Waypoint 1.

SECTION 4: Photopoint Data

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

Attributes	
Title	Photopoint 001
Unit name	Joshua Tree
Route name	Not Named
Determination	Way
Maintenance	None
Feature	End of route at
	campsite





Attributes	
Title	Photopoint 002
Unit name	Joshua Tree Forest
Route name	BLM 7099
Determination	Way
Maintenance	None
Feature	Typical condition of
	Route/Way





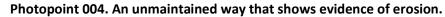
Attributes	
Title	Photopoint 003
Unit name	Joshua Tree Forest
Route name	Not named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way





Trudeau & Fields, 2015

Attributes	
Title	Photopoint 004
Unit name	Joshua Tree Forest
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Erosion







Title Photopoint 005
Unit name Joshua Tree Forest
Route name Not named
Determination Way
Maintenance None
Feature Wildlife Water
Enhancement

Photopoint 005. The dilapidated water catchment tank near other unused water catchment infrastructure.





Attributes	
Title	Photopoint 006
Unit name	Joshua Tree Forest
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

Photopoint 006. A primitive route that continues past unused water catchment.





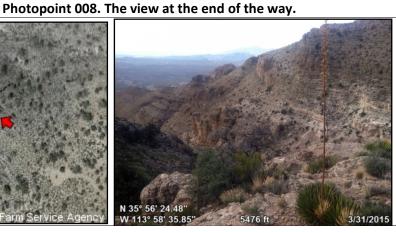
Attributes	
Title	Photopoint 007
Unit name	Joshua Tree Forest
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way





Attributes	
Title	Photopoint 008
Unit name	Joshua Tree Forest
Route name	N/A
Determination	N/A
Maintenance	N/A
Feature	Scenic/Landscape





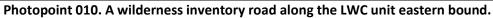
Attributes Title Photopoint 009 Unit name Joshua Tree Forest BLM Route 7099 Route name Determination Way None Maintenance Typical condition of Feature Route/Way





Photopoint 009. Primitive route that leads to an AZ Game and Fish wildlife water

Attributes	
Title	Photopoint 010
Unit name	Joshua Tree Forest
Route name	BLM Route 7084
Determination	Road
Maintenance	Recent blade
Feature	Typical condition of
	Route/Way







Attributes Title Photopoint 011 Unit name Joshua Tree Forest Route name BLM Route 7084 Determination Road Maintenance Likely if needed Typical condition of Feature Route/Way

Photopoint 011. User-created bypass of a recently washed out gully along the wilderness inventory road.



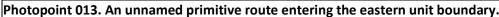


Attributes	
Title	Photopoint 012
Unit name	Joshua Tree Forest
Route name	BLM Route 7084
Determination	Road
Maintenance	Recent blade
Feature	Typical condition of Route/Way





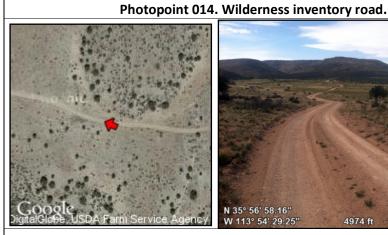
Attributes	
Title	Photopoint 013
Unit name	Joshua Tree Forest
Route name	Not named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way







Attributes	
Title	Photopoint 014
Unit name	Joshua Tree
Route name	BLM Route 7097
Determination	Road
Maintenance	Recent blade
Feature	Typical condition of Route/Way



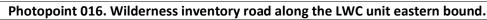


Attributes Photopoint 015 Title Joshua Tree Forest Unit name Route name BLM Route 7082 Determination Way Maintenance None Typical condition of Feature Route/Way





Attributes	
Title	Photopoint 016
Unit name	Joshua Tree Forest
Route name	BLM Route 7097
Determination	Road
Maintenance	Recent blade
Feature	Typical condition of
	Route/Way







Attributes	
Title	Photopoint 017
Unit name	Joshua Tree Forest
Route name	BLM Route 7089
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

Photopoint 017. A seldom used wash route seen from Dianmond Bar Road.





Title Photopoint 018
Unit name Joshua Tree Forest
Route name BLM Route 7051
Determination Way
Maintenance None
Feature Typical condition of Route/Way

Photopoint 018. A narrow primitive route that appears to be kept open solely by the passage of vehicles.





Attributes	
Title	Photopoint 019
Unit name	Joshua Tree Forest
Route name	Not named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

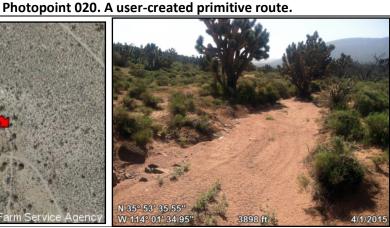
Photopoint 019. A way heading to the northwest from Diamond Bar Road along the southern LWC unit boundary.





Attributes	
Title	Photopoint 020
Unit name	Joshua Tree Forest
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Trampling of vegetation to access wash





Attributes Title Photopoint 021 Unit name Joshua Tree Forest BLM Route 7051 Route name Determination Way Maintenance None Typical condition of Feature Route/Way

Photopoint 021. A way within the southwestern part of the unit. This way is clearly not being maintained nor does it access any infrastructure.





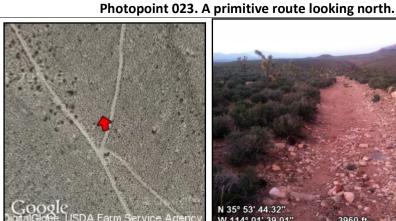
Attributes	
Title	Photopoint 022
Unit name	Joshua Tree Forest
Route name	BLM Route 7051
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

Photopoint 022. An smooth section of BLM Route 7051, which is used almost exclusively by ATV's. The Friends of the Joshua Tree Forest have identified increasing ATV traffic as a theat to the forest and the ACEC.





Attributes		
Title	Photopoint 023	
Unit name	Joshua Tree Forest	
Route name	Not named	
Determination	Way	
Maintenance	Old evidence	
	Typical eroded	
Feature	condition of	
	Route/Way	





Attributes	
Title	Photopoint 024
Unit name	Joshua Tree Forest
Route name	Not named
Determination	Way
Maintenance	None
Feature	Typical condition of
	Route/Way





Attributes	
Title	Photopoint 025
Unit name	Joshua Tree Forest
Route name	Not named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way







Attributes

Title Photopoint 026

Unit name Joshua Tree

Route name Not named

Determination Way

Maintenance None

Feature Erosion

Photopoint 026. Further evidence of erosion on this primitive route that is impassable for most motorized users.





Title Photopoint 027
Unit name Joshua Tree Forest
Route name BLM Route 7089
Determination Way
Maintenance None
Feature Typical condition of Route/Way

Photopoint 027. An unmaintained wash route below Grapevine Windmill that dead eands at Lake Mead NRA, where it is closed to motorized travel.





Attributes	
Title	Photopoint 028
Unit name	Joshua Tree
Route name	BLM Route 7093
Determination	Way
Maintenance	None
Feature	Typical condition of
	Route/Way







Attributes
Title Photopoint 029
Unit name Joshua Tree Forest
Route name BLM Route 7051
Determination Way
Maintenance None
Feature Typical condition of Route/Way

Photopoint 029. Looking north up BLM 7051, which is not maintained.

Almost all traffic consists of ATV's.





Attributes
Title Photopoint 030
Unit name Joshua Tree Forest
Route name Not Named
Determination Reclaimed
Maintenance None
Feature Revegetated

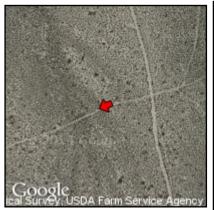
Photopoint 030. There are three ways that leave from this point. All are heavily revegetated with native plants, are completely unused, and fading into naturalness.





Attributes	
Title	Photopoint 031
Unit name	Joshua Tree Forest
Route name	Not Named
Determination	Way
Maintenance	None
Feature	Revegetated

Photopoint 031. Maintained solely by passage of vehicles. No recent use, but probably some occasional ATV passage to access BLM Route 7051. This is a fourfoot wide, rapidly naturalizing abandoned way.





Attributes		
Title	Photopoint 032	
Unit name	Joshua Tree Forest	
Route name	Not Named	
Determination	Way	
Maintenance	None	
Feature	Typical condition of Route/Way	





Attributes Title Photopoint 033 Unit name Joshua Tree Forest Route name **Not Named** Determination Way Maintenance None Revegetating Feature

Photopoint 033. This primitive route is kept open solely by the passage of occassional recreational vehicles.





Attributes	
Title	Photopoint 034
Unit name	Joshua Tree Forest
Route name	Not named
Determination	Way
Maintenance	None
Feature	Typical condition of Route/Way

Photopoint 034. This unnamed way is kept open solely by the passage of recreational vehicles.





Attributes
Title Photopoint 035
Unit name Joshua Tree Forest
Route name Not named
Determination Way
Maintenance None
Feature Typical condition of Route/Way

Photopoint 035. This primitive route is kept open solely by the passage of recreational vehicles; if it is ever even used.





Attributes		
Title	Photopoint 036	
Unit name	Joshua Tree Forest	
Route name	BLM Route 7095	
Determination	Way	
Maintenance	None	
Feature	Typical condition of Route/Way	

Photopoint 036. This revegetating way is hardly ever used.





Attributes		
Title	Photopoint 037	
Unit name	Joshua Tree Forest	
Route name	Not named	
Determination	Revegetating Way	
Maintenance	None	
Feature	Erosion and	
	revegetating tracks	

Photopoint 037. This primitive route is clearly not being maintained, and will be reclaimed by nature quite soon.





Attributes

Title Photopoint 038

Unit name Joshua Tree Forest

Route name BLM Route 7095

Determination Reclaimed

Maintenance None

Feature Revegetated

Photopoint 038. This way shows no evidence of use and has been classified as 'reclaimed' due to the abundant vegetation growing into it.





Attributes		
Title	Photopoint 039	
Unit name	Joshua Tree Forest	
Route name	Not named	
Determination	Road	
Maintenance	Old evidence	
Feature	Typical condition of	
	Route/Way	

Photopoint 039. Wilderness inventory road that also contains a waterline.





Attributes		
Title	Photopoint 040	
Unit name	Joshua Tree Forest	
Route name	Not named	
Determination	Way	
Maintenance	None	
Feature	Typical condition of Route/Way	





Attributes		
Title	Photopoint 041	
Unit name	Joshua Tree Forest	
Route name	Not named	
Determination	Way	
Maintenance	None	
Feature	Typical condition of	
	Route/Way	





Attributes		
Title	Photopoint 042	
Unit name	Joshua Tree Forest	
Route name	BLM Route 7093	
Determination	Way	
Maintenance	None	
Feature	Typical condition of Route/Way	

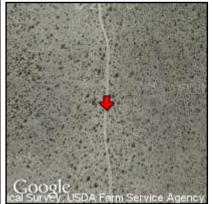


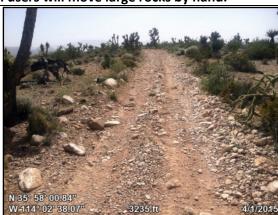


Attributes		
Title	Photopoint 043	
Unit name	Joshua Tree Forest	
Route name	BLM Route 7051	
Determination	Way	
Maintenance	None	
Feature	Typical condition of Route/Way	

Photopoint 043. The northern end of BLM Route 7051, which is not mechanically maintained, just like the southern end.

On occasion, recreational users will move large rocks by hand.





Title Photopoint 044
Unit name Joshua Tree Forest
Route name NPS way that leads to BLM Route 7089
Determination Way
Maintenance None
Feature Typical condition of Route/Way

Photopoint 044. An unmaintained, primitive wash route on NPS land that receives some vehicular use despite being closed to mototized travel.



