

Apache-Sitgreaves National Forests Draft Wilderness Evaluation Report

Mother Hubbard Potential Wilderness

PW-03-01-040

June 2009

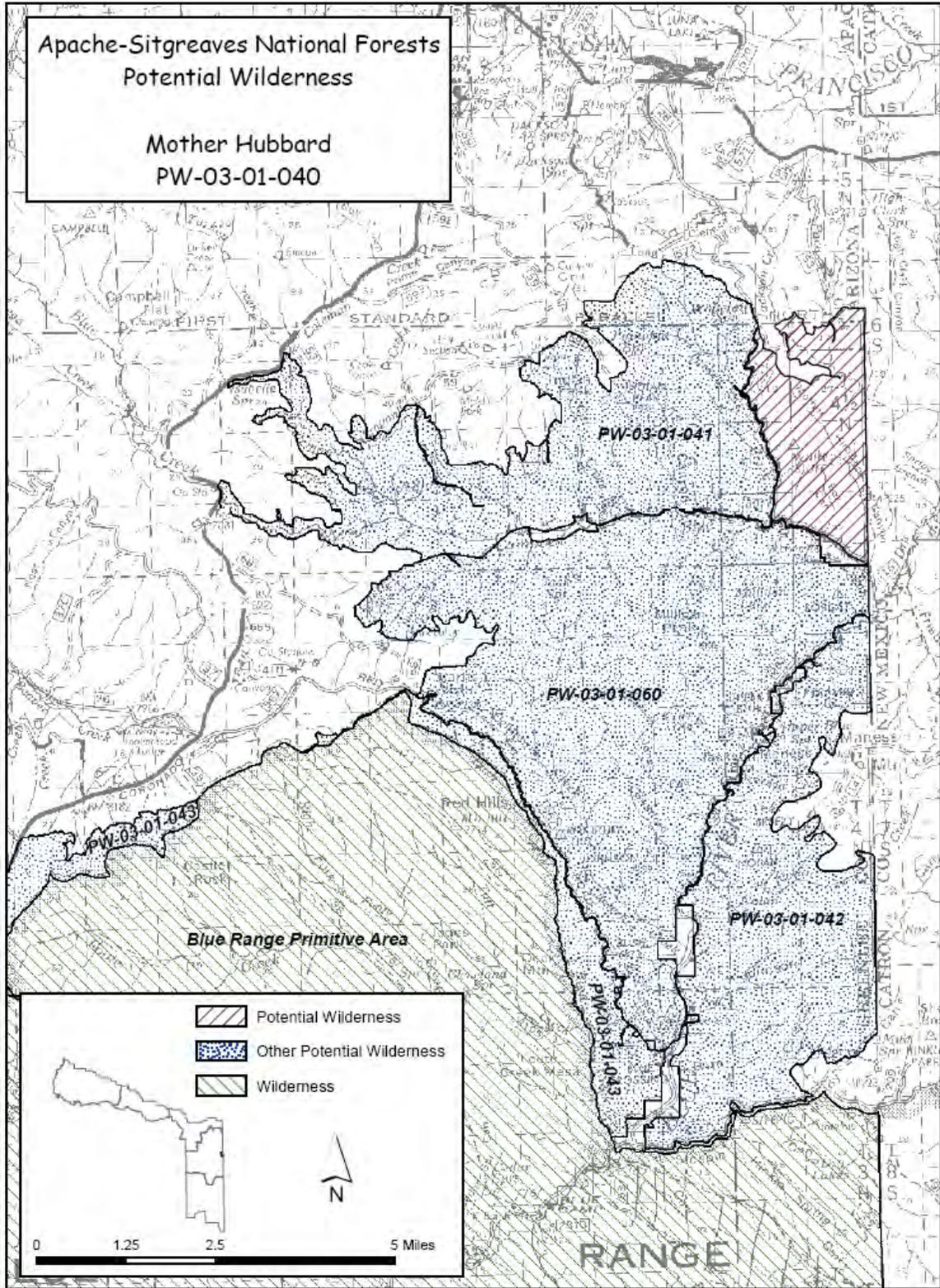
This draft potential wilderness evaluation report is divided into four parts: background, capability, availability, and need. Capability and availability are intended to be objective evaluations of existing conditions in the Mother Hubbard Potential Wilderness.

The most important area of focus for public comment is the “need” evaluation. The intent of this part of the evaluation is to consider if the potential wilderness fits into the National Wilderness Preservation System at the regional level. This report offers data that helps us understand different sources that might generate need. Ultimately, however, need for wilderness is generated by public demand. Therefore, public input is an essential component of this part of the potential wilderness evaluation.

We would like your feedback on this draft report - if we have missed an important detail or if you would like to share your comments or other input, please contact us. Written comments can be sent to: Apache-Sitgreaves National Forests, Attention: Forest Plan Revision Team, P.O. Box 640, Springerville, Arizona 85938, or E-mail: asnfp.planning@fs.fed.us. We are also available by phone; ask for a planning team member at 928-333-4301 or 928-333-6292 (TTY).

Table of Contents

Introduction	1
Background	2
Capability Evaluation	4
Availability Evaluation	6
Need Evaluation	8
Appendix A: Wilderness Evaluation Process	11
Appendix B: Capability Evaluation and Ratings	13
Appendix C: Availability Evaluation and Ratings	17
Appendix D: Need Evaluation	19



Disclaimer Statement

The USDA Forest Service uses the most current and complete data available. GIS data and product accuracy may vary. Using GIS products for purposes other than those for which they were intended may yield inaccurate or misleading results. The USDA Forest Service reserves the right to correct, update, modify, or replace GIS products without notification. This map is not a legal land line or ownership document. Public lands are subject to change and leasing, and may have access restrictions; check with local offices. Obtain permission before entering private land.

Map created June 2009 by etreiman.

Introduction

As part of the Forest Plan Revision process for the Apache-Sitgreaves National Forests (ASNFs), the Forest Service has prepared this Wilderness Evaluation Report for the Mother Hubbard potential wilderness.

Purpose

The Forest Service must evaluate all lands possessing wilderness characteristics for potential wilderness during plan revision (39 CFR 219.17). Completion of a potential wilderness inventory and evaluation is an essential step in the plan revision process. Wilderness is just one of many special area designations that the Forest Service considers during plan revision, but it is one of only three special area evaluations that are mandatory. If an area is recommended for wilderness designation, then the revised plan would contain desired conditions, objectives, and/or guidelines that would protect its wilderness characteristics.

The Process

The wilderness evaluation began with an inventory of potential wilderness, which includes areas of federal land over 5,000 contiguous acres and other areas that meet the criteria in FSH 1909.12 Ch. 71, and then determined if those areas meet the definition of wilderness. Once a list of potential wilderness areas was created, each area was evaluated for capability, availability, and need. These evaluation factors are described in the introduction to each evaluation step and in Appendix A. This report summarizes the wilderness capability, availability, and need evaluations based on the best available information.

The ASNFs will use this report to determine whether or not to make a preliminary administrative recommendation for wilderness designation for the Mother Hubbard potential wilderness. The Responsible Official's (Forest Supervisor) recommendation will be documented in the final Plan and the Plan Approval Document. Public comments on this report will be accepted and considered throughout the plan revision process. If a potential wilderness is recommended for wilderness, the recommendation will receive further review by the Chief of the Forest Service and the Secretary of Agriculture. If the Chief of the Forest Service intends to move forward with a wilderness recommendation, the Forest Service will complete a detailed analysis of the trade-offs and impacts in accordance with the National Environmental Policy Act, including further public review and comment. Ultimately, only Congress has the authority to designate wilderness.

Background

Name	Mother Hubbard
Number	PW-03-01-040
Acres	2,656
Ranger District	Alpine
History (if applicable)	The potential wilderness includes RARE II analysis area 03134, Mother Hubbard (2,100 acres in AZ). An additional 6,090 acres of this RARE II area are located in New Mexico. The Mother Hubbard Inventoried Roadless Area (IRA) (2001 Roadless Rule) has 2,065 acres in AZ.
Location, Vicinity, and Access	Approximately 40 miles south southeast of Springerville, Arizona in northern Greenlee and southern Apache Counties. It is located in the ASNFs in extreme eastern Arizona. Primary access is via U.S. Highway 180 and Forest Road (FR) 281.
Geography and Topography	Major landmarks are Mother Hubbard and Box Canyons. Elevations range from almost 6,400 feet along Campbell Blue Creek to 7,900 feet along the north boundary. The area is very rugged with steep slopes and several canyons.
Surroundings	<p>FR 281 delineates the west and south boundaries. The AZ/NM state line forms the eastern boundary. The north boundary is defined by activity areas. There is one parcel of private land adjacent to the southern boundary. Campbell Blue Creek is just south of the potential wilderness.</p> <p>The Blue Range Primitive Area is 10 miles south of this potential wilderness. The FR 281 corridor and a parcel of private land separate this area from Centerfire potential wilderness to the south. The FR 281 corridor separates Mother Hubbard potential wilderness from Campbell Blue potential wilderness to the west.</p>
Vegetation	<p>A mosaic of vegetative communities is found within Mother Hubbard potential wilderness. Vegetation types vary with elevation, aspect, and slope and include piñon-juniper woodland, Madrean pine-oak woodland, ponderosa pine forest, montane/subalpine grassland, and montane willow riparian forest. There are some old ponderosa pines. The montane willow riparian forest along the stream channels consists primarily of narrowleaf cottonwood, thinleaf alder, birch, redosier dogwood, and a variety of willows. Sensitive plant species include Blumer's dock, White Mountains clover, yellow lady's-slipper, and possibly Arizona alum root. Some mullein, a Class C noxious weed, is found along the boundary roads.</p> <p>Vegetation is a Wild and Scenic River (WSR) Outstandingly Remarkable Value (ORV) for Campbell Blue Creek because of the diversity of species found within the river corridor.</p>
Appearance and Key Attractions	<p>The Mother Hubbard potential wilderness appears mostly natural. The potential wilderness area is rugged and is located in an area of low population density. Human-related features in the area include a developed spring. There is a small waterfall on Pace Creek.</p> <p>Scenery is a WSR ORV for Campbell Blue Creek because of remarkable mix of landforms, vegetation, and colors.</p>

Special Designations The Campbell Blue Creek eligible WSR is located just south of the potential wilderness.

CURRENT USES

Recreation Current recreation activities are primarily hunting and viewing scenery and wildlife. There are no developed trails or recreation sites within the area. Most of the area has a recreation emphasis of Semi-Primitive Non-Motorized, with the remainder Semi-Primitive Motorized and Roaded Natural.

Recreation is a WSR ORV for Campbell Blue Creek because the opportunities have the potential to attract visitors from within and beyond the area of comparison.

Wildlife Large wildlife species found in the area include elk, mule deer, black bear, and mountain lion. Small animals and birds also inhabit the area. Threatened wildlife species include Mexican spotted owl. Candidate wildlife species include New Mexico meadow jumping mouse. Sensitive wildlife species include bald eagle, American peregrine falcon, northern goshawk, Arizona Bell's vireo, narrow-headed gartersnake, Ferris' copper and four-spotted skipperling butterflies, and possibly northern leopard frog, White Mountains water penny beetle, and Arizona. Sensitive fish species include longfin dace, Sonora sucker, and desert sucker. The potential wilderness is mostly within the primary Mexican wolf recovery zone.

Wildlife species and Fish species and habitat are WSR ORVs for Campbell Blue Creek because of the diversity of special status species and habitat.

Range Cattle grazing is a primary use. The potential wilderness is within the Turkey Allotment. There are no fences in the area.

Water The potential wilderness includes a section of Pace Creek, the only perennial stream. Pace Creek riparian systems are currently "functioning-at-risk". All other drainages are intermittent. There is one developed spring in the potential wilderness.

Minerals There are no mining claims, mineral districts, mineral withdrawals, or coal, oil and gas, or geothermal leases in the potential wilderness.

Heritage Resources The potential wilderness is within the area that was used extensively by the prehistoric Mogollon culture.

Fire Sixteen small fires (most < ¼ acre and the largest approximately 5 acres) occurred between 1971 and 2006. The majority were caused by lightning.

Capability Evaluation

Wilderness capability describes the basic characteristics that make the area appropriate and valuable for wilderness designation, regardless of the area's availability or need. Five sets of factors are used to determine capability: naturalness, level of development, opportunities for solitude or primitive and unconfined recreation, special features, and the ability of the Forest Service to manage the area as wilderness. The first four factors consider how the current conditions of the potential wilderness fit the definition of wilderness. Manageability is slightly different because it evaluates features of the area that would make it more or less difficult to manage as wilderness, such as size, shape, and juxtaposition to external influences. The following summarizes the information found in Appendix B.

Summary

Natural

Medium to High

The potential wilderness is essentially natural and the diversities of vegetation and wildlife species are key features. Vegetation types include Madrean pine-oak and piñon-juniper woodlands, montane willow riparian and ponderosa pine forests, and montane/subalpine grassland. The potential wilderness provides habitat for a wide variety of animal and plant species. Free-flowing, perennial streams include Pace Creek. There are no known water quality concerns. Campbell Blue Creek is an eligible WSR with proposed classifications of Wild, Scenic, and Recreational. Mullein is found along area roads, but there are no records of the plant within the potential wilderness. The night sky is not affected by ranch lights along Campbell Blue Creek.

Undeveloped

High

There is little evidence of human activity within the area.

Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation

Medium

The potential wilderness has outstanding opportunities for primitive and unconfined recreation because of the rugged terrain and lack of trails. Recreation opportunities include hiking, hunting, and viewing wildlife. There are opportunities for solitude, but the signs of civilization are visible in conjunction with the private land and road along the south boundary and the road along the west boundary.

Special Features and Values

Medium

Special features and values include the two canyons, a small waterfall on Pace Creek, high potential for ecological and cultural research, and habitat for Mexican spotted owls.

Manageability

High

The potential wilderness could be managed to protect its wilderness character. The area's rugged terrain limits access, motor vehicle use, and the effects of outside activities. There are no known encumbrances or resource conflicts.

OVERALL CAPABILITY

Medium

Availability Evaluation

Availability criteria indicate the availability of a potential wilderness for wilderness designation by describing other resource and land use potentials for the area. Availability examines the potential impact of designating an area as wilderness to both the current and future land uses and activities. In essence, it is a summary of the trade-offs between wilderness and other uses. The following summarizes the information found in Appendix C.

Summary

Water Yield

High

The area is of value for water yield. However, no impoundments are needed.

Habitat Management

Medium

Erosion control and watershed structures on upper Pace Creek are needed to reduce headcutting and sediment production.

Aquatic Restoration

Medium to High

Erosion control and watershed structures are needed on Pace Creek within the next five years to reduce headcutting and sediment production.

Vegetation Restoration

Medium

Fuel reduction through burning has been proposed in the potential wilderness. Hand thinning for riparian restoration is occurring along the south boundary.

Public Access Needed

High

There are no unique characteristics that would require developed public access. Forest roads parallel west and south boundaries.

Land Use Authorizations

High

Current authorizations within the area, primarily grazing permits, do not conflict with potential wilderness. Power line and road rights-of way are adjacent to the potential wilderness on the west and south.

Adjacent Non-FS Lands

Medium

There is one private land parcel adjacent to the southern boundary.

Minerals

High

There is a low potential for future mineral uses.

OVERALL AVAILABILITY

Medium to High

Need Evaluation

The evaluation criteria below indicate how the potential wilderness might fit into the National Wilderness Preservation System, which includes all wilderness areas in the United States. Need is considered at the regional level and must incorporate public participation. The criteria used to evaluate need include consideration of other wilderness and non-wilderness areas that provide opportunities for unconfined outdoor recreation or preservation of certain ecosystem characteristics. The following summarizes the information found in Appendix D.

Summary

Factor 1 - The location, size, and type of other wildernesses in the general vicinity and their distance from the proposed area. Consider accessibility of areas to population centers and user groups. Public demand for wilderness may increase with proximity to growing population centers.

Low

There are adequate wilderness opportunities in the vicinity of Mother Hubbard potential wilderness. Within 100 miles of this potential wilderness there are 1,348,231 wilderness and primitive area¹ acres. Within 100 miles of Silver City, New Mexico, the closest population center, there are 472,888 potential wilderness acres on the ASNFs and 1,204,467 wilderness and primitive area acres.

Factor 2 - Present visitor pressure on other wildernesses, the trends in use, changing patterns of use, population expansion factors, and trends and changes in transportation.

Medium

According to the 2001 National Visitor Use Monitoring study, approximately 38,000 people visited the three Wilderness areas on the ASNFs. Most of this use was concentrated in the two smaller, more easily accessed Wildernesses, Mount Baldy and Escudilla. Visitor use in Mount Baldy is locally considered high, while visitor use in Escudilla is considered moderate to high. Use in Bear Wallow Wilderness is lighter because it is less easily accessed and slightly larger. Wilderness users on the ASNFs are predominantly male, white or Hispanic/Latino, between the ages of 31 and 60, and live in the Phoenix and Tucson areas.

Approximately 70 percent of the Arizona visitors to the ASNFs are from the Phoenix (58 percent) and Tucson (11 percent) metropolitan areas. Populations in these areas have increased much faster than in the more rural areas. Visitors from the four counties where the ASNFs are located account for another 20 percent. In general, there has been no to moderate population growth in these counties. Recently, there have been major highway improvements between Phoenix and the ASNFs.

It can be assumed that with increasing populations and improved transportation features, wilderness use on the ASNFs would continue to increase, especially in those areas where the trailheads are easily accessed.

Surrounding National Forests (Coconino, Coronado, Gila, and Tonto) all have much higher numbers of wilderness visits than the ASNFs. Use on the Coconino, Coronado, and Gila is high, while use on the ASNFs and Tonto is moderate.²

¹ The Blue Range Primitive Area is the last remaining such area in the United States. It is managed as wilderness in accordance with Forest Service Manual 2320.3(11).

² This is based on use categories developed by the Forest Service Wilderness Advisory Group, with low use defined as 0-10,000 visits, medium as 10,001 – 30,000 visits, and high being greater than 30,000 visits. Total wilderness use

Regionally, increased demand for additional wilderness in both Arizona and New Mexico should be anticipated based on population growth that occurred from 1990 to 2000, which far exceeded the national growth rate. Assuming Arizona continues to grow at a rate much higher than the national rate, visits to wilderness will continue to increase. Arizona, in particular, could benefit from additional wilderness.

Public demand increases with proximity to six population centers: Flagstaff, Phoenix, Tucson, Santa Fe, Taos, and Albuquerque. Consider wilderness recommendations within 100-150 miles of those cities to provide for that demand. Some additional public demand for wilderness in the Southwestern Region will occur from people moving to rural communities near the National Forests.

Nationwide, Wilderness represents 17 percent of all federal agency acres. In the Southwestern Region 13 percent of the Forest Service lands are Wilderness. Only 6 percent of the federal acres in northeast Arizona are wilderness acres. For wilderness acres in the Southwestern Region to be at the national average would require the addition of about 1 million acres.

Factor 3 - The extent to which nonwilderness lands on the NFS unit or other Federal lands are likely to provide opportunities for unconfined outdoor recreation experiences.

Low

There are adequate nonwilderness lands on or near the ASNFs that could provide unconfined outdoor recreation experiences. Within 100 miles of the Silver City, New Mexico, the closest population center, there are over 1.5 million acres of primitive area, IRAs, and Bureau of Land Management Wilderness Study Areas. Additionally, there are over 900,000 acres managed for semi-primitive and primitive recreation on the ASNFs. Many of these acres overlap with Wilderness, the Blue Range Primitive Area, IRAs, and potential wilderness.

Factor 4 - The need to provide a refuge for those species that have demonstrated an inability to survive in less than primitive surroundings or the need for a protected area for other unique scientific values or phenomena.

Low

The ASNFs have identified 11 Threatened and Endangered Species, 105 Species of Concern³, and 208 Species of Interest⁴ that occur or are found on the forests. None of these species require a primitive wilderness environment to survive. However, some (Mexican gray wolf, for example) would benefit from reduced disturbance and human encounters.

Factor 5 - Within social and biological limits, management may increase the capacity of established wildernesses to support human use without unacceptable depreciation of the wilderness resource.

Low

There is little opportunity for management to increase the capacity of the established wildernesses on the ASNFs. Both Mount Baldy and Escudilla Wildernesses are heavily used, are less than 10,000 acres, are easily accessed by motor vehicles, and have limited trail systems. Encounters with other wilderness visitors in both areas are high. No management changes have been identified for Bear Wallow Wilderness because the use is much lighter.

for a forest from NVUM was divided by the number of wildernesses the forest is lead for, to get an average amount of use per wilderness.

³ Species of Concern are species for which management actions may be necessary to prevent listing under the Endangered Species Act.

⁴ Species of Interest are species for which management actions may be necessary to achieve ecological or other multiple-use objectives.

Factor 6 - An area's ability to provide for preservation of identifiable landform types and ecosystems. Consideration of this factor may include utilization of Edwin A. Hammond's subdivision of landform types and the Bailey-Kuchler ecosystem classification. This approach is helpful from the standpoint of rounding out the National Wilderness Preservation System and may be further subdivided to suit local, subregional, and regional needs.

Low to Medium

This potential wilderness contains one underrepresented ecosystems: 922 acres of piñon-juniper woodland.

OVERALL NEED

Low, contains one underrepresented ecosystem

Appendix A: Wilderness Evaluation Process

The following is summarized from Forest Service Handbook 1909.12, Chapter 70. This process is used by the Forest Service to determine whether there are areas that could be recommended for wilderness designation by Congress. The process includes three steps: an inventory of potential wilderness areas, an evaluation of the potential wilderness areas, and a determination if a recommendation will be pursued for any potential wilderness areas.

Inventory of Potential Wilderness Areas

The first step in the evaluation of potential wilderness is to identify and inventory all areas within National Forest System Lands that satisfy the definition of wilderness found in the 1964 Wilderness Act.

Areas identified through this process are called potential wilderness areas. This inventory of potential wilderness is not a land designation. It is completed with the express purpose of identifying all lands that meet the criteria for being evaluated for wilderness suitability and possible recommendation to Congress for wilderness designation.

The inventory of areas relies on local knowledge and judgment regarding unique, site-specific conditions of each area being considered. The boundaries of areas for the potential wilderness inventory should facilitate easy on-the-ground identification.

Inventory Criteria

Areas qualify for inclusion in the potential wilderness inventory if they meet the statutory definition of wilderness and meet either criteria 1 and 3 or criteria 2 and 3 below.

1. Areas contain 5,000 acres or more.
2. Areas contain less than 5,000 acres, but meet one or more of the following criteria:
 - a. Can be preserved due to physical terrain and natural conditions.
 - b. Self-contained ecosystems, such as an island, that can be effectively managed as a separate unit of the National Wilderness Preservation System.
 - c. Contiguous to existing wilderness, primitive areas, Administration-endorsed wilderness, or potential wilderness in other Federal ownership, regardless of their size.
3. Areas do not contain forest roads (36 CFR 212.1) or other permanently authorized roads, except as permitted in areas east of the 100th meridian (sec. 71.12).

Areas may be included in the potential wilderness inventory even though they include the types of areas or features listed in FSH 1909.12, 71.11.

On the ASNFs, GIS was used to identify those areas that met the inventory criteria. Site-specific information was gathered from Ranger District (District) personnel to provide background information, identify features not shown in GIS, and determine where the Region 3 criteria on roaded areas, fingers, and extrusions should be applied.

Evaluation of Potential Wilderness Areas

An area recommended for wilderness must meet the tests of capability, availability, and need. In addition to the inherent wilderness quality it possesses, an area must provide opportunities and experiences that are dependent upon or enhanced by a wilderness environment. The ability of the Forest Service to manage the area as wilderness is also considered.

Capability

The capability of a potential wilderness is the degree to which an area contains the basic characteristics that make it suitable for wilderness recommendation without regard to its availability for or need as wilderness. The following characteristics are considered in evaluating a potential wilderness area:

1. Natural - an area is substantially free from the effects of modern civilization and generally appears to have been affected primarily by the forces of nature.
2. Undeveloped - the degree to which an area is without permanent improvements or human habitation.
3. Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation - the capability of the area to provide solitude or primitive and unconfined types of recreation. This includes a wide range of experiential opportunities. Solitude is the opportunity to experience isolation from sights, sounds, and the presence of others from developments and evidence of humans.
4. Special Features and Values - an area is capable of providing other values such as those with ecologic, geologic, scientific, educational, scenic, historical, or cultural significance.
5. Manageability - the ability to manage an area as wilderness as required by the Wilderness and how boundaries affect manageability of an area.

Responses to the capability questions were drafted at the ASNFs Supervisors Office and reviewed by District personnel. Any changes were incorporated into the capability evaluation.

If an area is found to not be capable of being wilderness (a rating of Low), it is not carried forward into the Availability Evaluation.

Availability

Areas determined to meet wilderness capability requirements are considered potentially available for wilderness designation. The determination of availability is conditioned by the value of and need for the wilderness resource compared to the value of and need for other resources. Other resource potential including current use and potential future use is analyzed for the various resources involved.

Constraints and encumbrances on lands may also govern the availability of lands for wilderness. The degree of Forest Service control over the surface and subsurface of the area is also considered. The Forest Service should have sufficient control to prevent development of incompatible uses that would negatively affect wilderness character and potential.

Responses to the availability questions were drafted by at the ASNFs Supervisors Office and reviewed by District personnel. Any changes were incorporated into the availability evaluation.

Need

The need for an area to be designated as wilderness is determined through an analysis on a regional basis by evaluating such factors as the geographic distribution of areas and representation of landforms and ecosystems to which it contributes to the overall National Wilderness Preservation System. This need is demonstrated through a public involvement process, including public input to the evaluation report.

A set of GIS models, information papers, and analyses were provided by the Region 3 Regional Office. This information was synthesized at the ASNFs Supervisors Offices and reviewed by District personnel. Any changes were incorporated into the need evaluation.

Appendix B: Capability Evaluation and Ratings

Capability Characteristics

Natural

1. Presence of non-native species.

High - Non-native species are not evident.

Medium - Non-native species are evident in isolated spots.

Low - Non-native species are common or scattered throughout the area.

Rating: **High** - Mullein is found along the roads near the area, but there are no GIS records of the plant within the potential wilderness.

2. Rivers within the potential wilderness are in free-flowing condition.

High - Rivers within the area are considered free-flowing.

Medium - Some rivers have impoundments or other issues that affect their free-flowing character.

Low - Rivers within the potential wilderness are seasonal or heavily impacted by impoundments.

Rating: **High** - The only perennial stream is Pace Creek. The remaining drainages are either intermittent or ephemeral. There are no known impoundments. Campbell Blue Creek is an eligible WSR with proposed classifications of Wild, Scenic, and Recreational. Campbell Blue Creek, just south of the potential wilderness, is an eligible WSR with a segment proposed classification of Recreational.

3. Quality of night-sky as affected by light pollution.

High - The night sky is clear with little to no interference from light pollution.

Medium - Some stars are visible and there is moderate degradation from light pollution.

Low - Few stars are visible at night and the presence of light pollution is evident.

Rating: **High** - There are no nearby population centers and the lights from Alpine are not visible from the area. Ranch lights along Campbell Blue Creek do not affect the night sky.

4. Presence of pollutants that degrade water.

High - All rivers/streams have been sampled and there are no water quality issues.

Medium - There are no known water quality issues within the area but not all rivers/streams have been sampled.

Low - There are rivers within the area that are listed on the State Impaired Waters List (303d).

Rating: **Medium** - None of the creeks in this potential wilderness have been sampled. There are no known water quality issues.

5. Area provides elements of biological diversity and naturalness, including unique habitats, TES or rare plants and wildlife.

High - Has critical or unique habitats and diverse ecological conditions.

Medium - Has a mix of habitats and ecological conditions.

Low - Has limited ecological conditions and habitats.

Rating: **Medium** - Biological diversity is moderate and essentially natural. The potential wilderness provides habitat for a wide variety of animal and plant species.

6. Area contains a variety of natural resources, including a variety of tree species and structures, intermingled grasslands or meadows, numerous recreation opportunities, diversity of wildlife habitats, and wildlife, etc.

High - Diverse amount of natural resources.

Medium - Mixed amount of natural resources.

Low - Limited amount of natural resource diversity.

Rating: **Medium** - Diversity of natural vegetation and wildlife species are key natural features. Vegetation types include Madrean pine-oak woodland, piñon-juniper woodland, montane willow riparian forest, montane/subalpine grassland, and ponderosa pine forest. The potential wilderness also contains several areas of old ponderosa pine. Hiking, hunting, and wildlife viewing are the main recreation opportunities. Wildlife species and habitat are diverse because the varied topographic, soil, and vegetative conditions within the area combine with perennial streams to provide habitat for numerous wildlife species.

Undeveloped

7. Area has current or past evidence of human activity.

High - Little or no evidence of human activity.

Medium - Unnoticeable or unobjectionable human activity.

Low - Obvious evidence of human activity.

Rating: **High** - There is little evidence of human activity within the area. There are no developed trails, no fences, and one developed spring in the potential wilderness.

Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation

8. Area provides physically and mentally challenging recreation opportunities that promote adventure and self-reliance.

High - Most of the area provides challenging recreation opportunities.

Medium - Some parts of the area have the potential for challenging recreation opportunities.

Low - Few parts of the area can provide challenging recreation opportunities.

Rating: **Medium** - The potential wilderness, especially the canyons, has physically and mentally challenging recreation opportunities. The lack of developed trails adds to the challenge.

9. Opportunity to experience solitude and isolation from human activities while recreating in the area.
High - Significant feeling of being alone or remote from civilization.
Medium - Feeling of being alone is possible but signs of civilization are likely.
Low - Little opportunity of feeling alone.

Rating: **Medium** - The potential wilderness provides opportunities for solitude throughout the area. However, signs of civilization are visible in conjunction with the road and private land along the south boundary and the road along the west boundary.

10. Opportunity to engage in primitive and unconfined recreation such as backpacking, kayaking, hunting, fishing, etc
High - There are many opportunities for engaging in primitive recreation.
Medium - There are some opportunities for engaging in primitive recreation.
Low - There are few to no opportunities to engage in primitive recreation.

Rating: **Medium** - There are opportunities for cross-county hiking, hunting, and viewing wildlife in the potential wilderness.

Special Features and Values

11. Area contains outstanding or distinct features like rock formations, panoramic views, etc.
High - Many distinct features or few but exceptional features.
Medium - Some distinct features.
Low - One or no distinct features.

Rating: **Medium** - Distinctive features of Mother Hubbard potential wilderness are the two canyons and a small waterfall on Pace Creek near the east boundary.

12. Area has potential for scientific research, environmental education, or historic/cultural opportunities.
High - Good potential for two or more types of these opportunities.
Medium - Potential for one type of opportunity.
Low - Little or no potential for this type of opportunity.

Rating: **High** - There is the potential for scientific research because of the ecological diversity of the area and for cultural resources because the Mogollon culture used the Blue River and Campbell Blue Creek corridors.

13. Area contains unique or rare species of plants and/or animals.
High - Area has several unique or rare plants and/or animals.
Medium - Area has a few unique or rare plants and/or animals.
Low - Area has no unique or rare plants and/or animals.

Rating: **Medium** - Mexican spotted owls are found in the potential wilderness. Blumer's dock, White Mountains (Mogollon) clover, yellow lady's-slipper, and Arizona alum root are sensitive plant species possibly found in the potential wilderness. The threatened loach minnow is found in Campbell Blue Creek, south of the potential wilderness.

Overall Capability: Medium

Manageability

14. Ability to manage the area for wilderness character, including distance and influence from outside activities; opportunity to access the area; and resource conflicts or encumbrances.

High - Isolated from areas of activity; controlled or limited access; no encumbrances or resource conflicts.

Medium - Somewhat isolated from areas of activity; adequate access opportunities; some resource conflicts and/or encumbrances.

Low - Areas of activity are nearby; many access opportunities; many resource conflicts and/or encumbrances.

Rating: **High** - The area's terrain limits access and the effects of outside activities. There are no known encumbrances or resource conflicts.

15. Motorized use within the area.

Yes - Has motorized vehicle use.

No - Does not have any motorized vehicle use.

Rating: **No** - The rugged terrain deters motorized vehicle use.

Overall Manageability: High

Appendix C: Availability Evaluation and Ratings

Availability Characteristics

1. Areas that are of high value for water yield or on-site storage where installation and maintenance of improvements may be required.

High - No impoundment needed.

Medium - Minor improvements will have an effect.

Low - Identified impoundment that will have an effect on wild characteristics.

Rating: **High** - The area is of value for water yield. However, no impoundments are needed.

2. Areas needing management for wildlife or aquatic animals that MIGHT conflict with wilderness management.

Low - Intense management (motorized equipment: helicopters, chainsaws, broadcast burning) and frequent entries (= or <5 yrs).

Medium - Management requires helicopters but no motorized equipment on the ground and frequency is generally less than 10 years.

High - Low management requirements with no motorized equipment required to meet objectives and infrequent entries.

Rating: **Medium** - Active headcuts on upper Pace Creek are currently affecting loach minnow habitat downstream in New Mexico. Activities are needed to reduce the headcutting and sediment production.

3. Area needing active aquatic restoration activities.

Low - The majority of watershed needs attention.

Medium - Site-specific improvements needed.

High - Properly functioning with no or little restoration activities needed.

Rating: **Medium to High** - The riparian systems along Pace Creek are currently “functioning-at-risk”. Site-specific restoration treatments to reduce headcutting and sediment production (erosion control structures, watershed structures) are needed within the next five years.

4. Area needing active vegetative restoration activities due to specific species survival (such as White Bark Pine restoration) or identifiable fuel reduction activity to reduce the risk of catastrophic wildfire or known areas of severe insect infestation that will lead to heavy tree mortality.

Low - The need for vegetation restoration is a higher priority and requires long-term management and mechanized or motorized equipment.

Medium - Areas needing high intensity management activities for a short time period (< or = 5 years). These areas could be available for wilderness after those activities are completed (like fuel reduction activities). Some intense restoration work over small areas could be accomplished without conflicting with wilderness management (species conservation work not requiring motorized equipment).

High - The area needs little vegetative restoration.

Rating: **Medium** - The area has been proposed for fuel reduction through burning. Currently, hand thinning for riparian restoration on Campbell Blue Creek is occurring within 300' of Forest Road 281 along the southern boundary.

5. Areas having such unique characteristics or natural phenomena that general public access should be developed to facilitate public use and enjoyment.

High - Does not exist or minimal development will be provided.

Medium - Requires minor development or improvement that does not qualify as a developed recreation site but is a higher development level than is normally found within wilderness.

Low - Has a developed recreation site or features that warrant construction of a developed recreation site.

Rating: **High** - There are no unique characteristics that would require developed public access. Forest roads parallel west and south boundaries.

6. Lands committed through contracts, permits or agreements that would be in conflict with wilderness management (some minor permitted uses may be still be allowed).

High - Current authorizations do not conflict with potential wilderness.

Medium - Current authorization(s) but can be terminated or there is long-term authorization or commitment but does not require motorized equipment for access or maintenance.

Low - Currently exists, must be retained (long-term commitments), and requires motorized equipment for access or maintenance.

Rating: **High** - Current authorizations within the area, primarily grazing permits, do not conflict with potential wilderness. There are power line and road rights-of way adjacent to the potential wilderness on the west and south. A need has been identified to increase the road right-of-way from 66 feet to 300 feet; no requests have been received and the existing Inventoried Roadless Areas would need to be considered.

7. Forest Service has sufficient control to prevent development of irresolvable, incompatible use that would lessen wilderness character and potential.

High - No inholdings and no non-federal lands adjacent to potential wilderness.

Medium - No inholdings but adjacent lands may be private.

Low - Inholdings exist.

Rating: **Medium** - There is one private land parcel adjacent to the southern boundary.

Overall Availability: Medium to High

Appendix D: Need Evaluation

Factor 1 - The location, size, and type of other wildernesses in the general vicinity and their distance from the proposed area. Consider accessibility of areas to population centers and user groups. Public demand for wilderness may increase with proximity to growing population centers.

There are 18 Wildernesses and 1 primitive area⁵ within 100 miles of PW-03-01-040. The total acreage of these areas is 1,348,231 acres. The Forest Service (FS) manages 12 of these areas, the Bureau of Land Management (BLM) manages 7, and the National Park Service (NPS) manages 1.

Potential Wilderness	Existing Wilderness within 100 Miles	Existing Wilderness Acreage	Distance from Potential Wilderness	Managing Agency
PW-03-01-040	Peloncillo Mountains	19,244	98	BLM
PW-03-01-040	Aravaipa Canyon	19,790	101	BLM
PW-03-01-040	North Santa Teresa	5,733	85	BLM
PW-03-01-040	Santa Teresa	28,769	89	FS
PW-03-01-040	Needle's Eye	6,277	98	BLM
PW-03-01-040	Fishhooks	11,400	66	BLM
PW-03-01-040	Gila	558,549	52	FS
PW-03-01-040	Aldo Leopold	206,700	79	FS
PW-03-01-040	Bear Wallow	11,113	25	FS
PW-03-01-040	Blue Range Primitive Area	179,819	17	FS
PW-03-01-040	Blue Range	35,815	16	FS
PW-03-01-040	Apache Kid	44,835	96	FS
PW-03-01-040	Salt River Canyon	32,035	97	FS
PW-03-01-040	Mount Baldy	7,627	30	FS
PW-03-01-040	Escudilla	5,210	14	FS
PW-03-01-040	Withington	18,973	93	FS
PW-03-01-040	Cebolla	66,445	92	BLM
PW-03-01-040	West Malpais	37,839	90	BLM
PW-03-01-040	Petrified Forest	52,058	85	NPS
	TOTAL	1,348,231		

⁵ The Blue Range Primitive Area is the last remaining such area in the United States. It is managed as wilderness in accordance with Forest Service Manual 2320.3(11).

There are 12 Wildernesses, 1 primitive area, and 1,204,467 wilderness and primitive area acres within 100 miles of Silver City, New Mexico. There are 28 potential wildernesses and 472,888 potential wilderness acres on the ASNFs within 100 miles of Silver City (only acres within 100 miles are shown; actual and potential wildernesses may be larger).

Population Center	Wilderness within 100 Miles	Wilderness Acres within 100 Miles	Potential Wilderness Within 100 Miles	Potential Wilderness Acres within 100 Miles
Silver City	Aldo Leopold	206,700	PW-03-01-021	992
	Apache Kid	44,835	PW-03-01-022	1,031
	Bear Wallow	11,113	PW-03-01-063	5,381
	Blue Range Primitive Area	179,819	PW-03-01-029	1,160
	Blue Range	35,815	PW-03-01-065	484
	Chiricahua	88,793	PW-03-01-047	5,713
	Chiricahua National Monument	12,161	PW-03-01-064	172
	Dos Cabezas Mountains	11,855	PW-03-01-046	11,317
	Escudilla	5,210	PW-03-01-035	6,032
	Fishhooks	11,400	PW-03-01-044	6,497
	Gila	558,549	PW-03-01-066	1,205
	Peloncillo Mountains	19,244	PW-03-01-043	2,344
	Withington	18,973	PW-03-01-069	33,662
	TOTAL	1,204,467	PW-03-01-041	9,435
			PW-03-01-049	76,048
			PW-03-01-040	2,653
			PW-03-01-060	15,222
			PW-03-01-043	1,835
			PW-03-01-042	7,835
			PW-03-01-050	7,959
			PW-03-01-051	44,075
			PW-03-01-052	156,297
			PW-03-01-055	1,254
			PW-03-01-067	30,340
			PW-03-01-053	17,526
			PW-03-01-058	5,217
			PW-03-01-057	5,692
			PW-03-01-054	15,510
			TOTAL	472,888

Factor 2 - Present visitor pressure on other wildernesses, the trends in use, changing patterns of use, population expansion factors, and trends and changes in transportation.

Item 1

Each Federal agency that manages wilderness collects and reports visitor use information differently. The Forest Service reports wilderness use by each national forest, not each wilderness. The National Park Service collects backcountry visitor use only for overnight stays. The Bureau of Land Management reports use for each wilderness.

According to the 2001 National Visitor Use Monitoring study, approximately two percent of the Apache-Sitgreaves National Forests (ASNFs) users visited the three wilderness areas on the forest. This figure is similar to other non-urban forests in the Southwestern Region. More urban forests (Cibola and Coronado) reported approximately 25% of their users visited wilderness areas.

Most of the wilderness use on the ASNFs is concentrated in the two smaller wilderness areas, Mount Baldy and Escudilla. These areas are each less than 10,000 acres, are easily accessible by motor vehicles, and have limited trail systems. Visitor use in Mount Baldy is considered high with use concentrated on two of the three trails. Visitor use in Escudilla is considered moderate to high with use concentrated on one trail. Encounters with other wilderness visitors in both areas are high. Use in Bear Wallow Wilderness is lighter because it is less accessible and is slightly larger. There are no accurate use figures for the Blue Range Primitive Area, which is managed as wilderness.

Approximately 70 percent of the Arizona visitors to the ASNFs are from the Phoenix and Tucson metropolitan areas. Populations in these areas have increased much faster than in the more rural areas. Visitors from the four counties where the ASNFs are located account for another 20 percent. In general, there has been no to moderate population growth in these counties. Recently, there have been major highway improvements between Phoenix and the ASNFs.

It can be assumed that with increasing populations and improved transportation features, wilderness use would continue to increase in those wilderness areas on the ASNFs that are easily accessible to the recreating public.

Item 2

The ASNFs include three designated wilderness areas, the nation's sole remaining primitive area, and 322,000 acres of inventoried roadless areas. Users of designated wilderness areas fit a profile similar to other forests' users: 1) they are predominantly male (81 percent), 2) white (91 percent) or Hispanic/Latino (6 percent), 3) between the ages of 31 and 60, and 4) often travel from the Phoenix and Tucson areas. NVUM data suggest that roughly 45,000 wilderness visits were made during fiscal year 2001 although the error rate on this data is very high (± 56 percent) because of the relatively low number of visitors interviewed (Kocis et al. 2002). There are no use figures specific to the Blue Range Primitive Area or the inventoried roadless areas.

Regional Demand for Wilderness

1. Increased demand for additional wilderness in both Arizona and New Mexico should be anticipated based on population growth that occurred during the period of 1990 to 2000, which exceeded the national growth rate.

2. Assuming Arizona continues to grow at a rate greatly outpacing the national rate (predicted to be about 3 times the national rate), the number of visits to existing wilderness will continue to increase, and Arizona in particular could benefit from additional wilderness.
3. Demographics related to visitor race and ethnicity will affect the rate of increase in wilderness visits in the Southwestern Region. Even though the faster growing racial/ethnic groups have relatively low participation rates, wilderness use is still expected to increase because of the overall population growth rate.
4. Public demand increases with proximity to six population centers: Flagstaff, Phoenix, Tucson, Santa Fe, Taos, and Albuquerque. Consider wilderness recommendations within 100-150 miles of those cities to provide for that demand.
5. Some additional public demand for wilderness in the Southwestern Region will occur from the influx of people moving to communities in the vicinity of the National Forests.
6. In terms of geographic distribution of wilderness, the Southwestern Region is under-represented with five percent fewer wilderness acres as compared with the representation nationally. Additionally, all quadrants in Arizona and New Mexico are under-represented with the exception of the southwest and southeast quadrants in Arizona. The most under-represented quadrants when compared with total federal wilderness acres are southeast and northwest New Mexico, and northeast Arizona which are at 6 percent or less in the number of wilderness acres.
7. Desirability of the scenic mountainous settings available in the rural communities within and adjacent to national forests in the Southwestern Region will attract new retirees and others, further contributing to a growth in wilderness visitation.

Factor 3 - The extent to which nonwilderness lands on the NFS unit or other Federal lands are likely to provide opportunities for unconfined outdoor recreation experiences.

There are 53 Inventoried Roadless Areas (IRA) and 1,206,507 IRA acres within 100 miles of Silver City. There are 11 BLM Wilderness Study Areas (WSA) and 173,476 WSA acres within 100 miles of Silver City (only acres within 100 miles are shown; actual IRAs and WSAs may be larger).

Within 100 miles of Silver City and on the ASNFs, there are 359,469 acres managed for Semi-Primitive Motorized (SPM) recreation, 282,175 acres managed for Semi-Primitive Non-motorized (SPNM) recreation, and 287,933 acres managed for Primitive recreation. Many of these acres overlap with existing wilderness areas, the Blue Range Primitive Area, IRAs, and potential wilderness areas.

Population Center	Inventoried Roadless Area within 100 Miles	IRA Acres within 100 Miles	National Forest
Silver City	1978 Administratively Endorsed Wilderness Proposal	4,281	Gila
	Apache Kid Contiguous	45,288	Cibola
	Apache Mountain	17,484	Gila
	Aspen Mountain	33,100	Gila
	Bear Wallow	876	Apache-Sitgreaves
	Black River Canyon	8,351	Apache-Sitgreaves
	Brushy Mountain	7,191	Gila
	Brushy Springs	5,728	Gila
	Campbell Blue	6,995	Apache-Sitgreaves
	Canyon Creek	9,814	Gila
	Centerfire	13,115	Apache-Sitgreaves
	Chiricahua	76,876	Coronado
	Black & Aldo Leopold Wilderness Contiguous	49,545	Gila
	Blue Range Wilderness Contiguous	1,978	Gila
	Gila Wilderness & Primitive Area Contiguous	78,973	Gila
	Datil	13,941	Cibola
	Devils Creek	89,814	Gila
	Dry Creek	26,690	Gila
	Eagle Peak	33,976	Gila
	Elk Mountain	6,542	Gila
	Escudilla Mountain	884	Apache-Sitgreaves
	Frisco Box	38,932	Gila
	Gila Box	23,741	Gila
	Hell Hole	35,034	Apache-Sitgreaves
	Hot Air	31,677	Apache-Sitgreaves
	Largo	12,715	Gila
	Lower San Francisco	59,248	Apache-Sitgreaves
	Lower San Francisco	26,432	Gila
	Meadow Creek	34,137	Gila
	Mitchell Peak	35,361	Apache-Sitgreaves
	Mother Hubbard	2,174	Apache-Sitgreaves

Population Center	Inventoried Roadless Area within 100 Miles	IRA Acres within 100 Miles	National Forest
	Mother Hubbard	5,888	Gila
	Nolan	13,035	Gila
	Nolan	6,772	Apache-Sitgreaves
	Painted Bluffs	43,074	Apache-Sitgreaves
	Peloncillo	22,047	Coronado
	Pinaleno	23,363	Coronado
	Pipestem	34,560	Apache-Sitgreaves
	Pipestem/Lower San Francisco	152	Apache-Sitgreaves
	Poverty Creek	8,760	Gila
	Salt House	21,823	Apache-Sitgreaves
	San Jose	14,952	Cibola
	Santa Teresa	131	Coronado
	Sawyers Peak	59,696	Gila
	Stone Canyon	6,793	Gila
	Sunset	28,920	Apache-Sitgreaves
	T Bar	6,815	Gila
	Taylor Creek	16,621	Gila
	The Hub	7,489	Gila
	Wagon Tongue	11,397	Gila
	Wahoo Mountain	21,847	Gila
	White Cap	8,026	Cibola
	Winchester	13,453	Coronado
	TOTAL	1,206,507	

Population Center	BLM Wilderness Study Area within 100 Miles	WSA Acres within 100 Miles
Silver City	Cowboy Springs	6,228
	Horse Mountain	7,881
	Big Hatchet Mountains	15,370
	Continental Divide	73,879
	Cedar Mountains	14,875
	Florida Mountains	2,106
	Peloncillo Mountains	3,981
	Apache Box	6,218
	Cooke's Range	19,858
	Gila Lower Box	8,515
	Blue Creek	14,565
	TOTAL	173,476

Factor 4 - The need to provide a refuge for those species that have demonstrated an inability to survive in less than primitive surroundings or the need for a protected area for other unique scientific values or phenomena.

The ASNFs have identified 11 Threatened and Endangered Species, 105 Species of Concern⁶, and 208 Species of Interest⁷ that occur or are found on the forests. None of these species require a primitive wilderness environment to survive. However, some (Mexican gray wolf, for example) would benefit from reduced disturbance and human encounters.

Factor 5 - Within social and biological limits, management may increase the capacity of established wildernesses to support human use without unacceptable depreciation of the wilderness resource.

There are three existing wildernesses on the ASNFs, all on the Apache side. Two, Mount Baldy and Escudilla, are less than 10,000 acres, are easily accessible by motor vehicles, and have limited trail systems. Visitor use in Mount Baldy is considered high with use concentrated on two of the three trails. Visitor use in Escudilla is considered moderate to high with use concentrated on one trail. Encounters with other wilderness visitors in both areas are high. For these two areas there are limited management opportunities to accommodate additional use. The third wilderness, Bear Wallow, is slightly larger, is more difficult to access, and has four trails. Visitor use is considered low. Here, additional demand could be accommodated without management changes.

⁶ Species of Concern are species for which management actions may be necessary to prevent listing under the Endangered Species Act.

⁷ Species of Interest are species for which management actions may be necessary to achieve ecological or other multiple-use objectives.

Factor 6 - An area's ability to provide for preservation of identifiable landform types and ecosystems. Consideration of this factor may include utilization of Edwin A. Hammond's subdivision of landform types and the Bailey-Kuchler ecosystem classification. This approach is helpful from the standpoint of rounding out the National Wilderness Preservation System and may be further subdivided to suit local, subregional, and regional needs.

The Southwestern Regional Office used the process outlined in Loomis and Echohawk (1999)⁸ to determine the underrepresented landforms and ecosystem types in Wilderness within Region 3.

The following landforms within the White Mountains-San Francisco Peaks-Mogollon Rim ecoregion section (where the ASNFs are located) are underrepresented in Wilderness in the region: Burro Mountains Oak-Juniper Woodland, Coconino Plateau Woodland, and San Francisco Peaks Coniferous Forest. Only Burro Mountain Oak-Juniper Woodland and Coconino Plateau Woodland are found on the ASNFs.

The following ecosystems types are underrepresented in Wilderness in the region: Desert Communities, Great Basin/Colorado Plateau Grassland, Great Plains Grassland, Piñon-Juniper Woodland, Sagebrush Shrubland, and Semi-desert Grassland. Only Great Basin Grassland, Piñon-Juniper Woodland, and Semi-desert Grassland are found on the ASNFs.

This potential wilderness contains one underrepresented ecosystems: 922 acres of Piñon-Juniper Woodland.

Overall Need: Low, but contains one underrepresented ecosystem

UNDERREPRESENTED LANDFORMS

Potential Wilderness	Name	Acreage	Acres of Burro Mountains Oak-Juniper Woodland	Acres of Coconino Plateau Woodland
PW-03-01-001	Leonard Canyon	22,405		7,171
PW-03-01-003	West Chevelon Canyon	9,493		3,689
PW-03-01-011	Black Canyon	4,913		4,911
PW-03-01-053	Cold Spring Mountain	17,541	1,878	
PW-03-01-054	Hells Hole	15,524	15,439	
PW-03-01-056	Chevelon Canyon North	6,678		6,612
PW-03-01-057	Coal Creek	5,698	370	
PW-03-01-058	Big Lue Mountains	5,222	4,932	

⁸ Loomis, John and Echohawk, J. Chris. 1999. Using GIS to identify under-represented ecosystems in the National Wilderness Preservation System in the USA. *Environmental Conservation*. 26 (1): 53-58.

UNDERREPRESENTED ECOSYSEMS

Potential Wilderness	Name	Acreage	Acres of Great Basin Grassland	Acres of Piñon-Juniper Woodland	Acres of Semi-Desert Grassland
PW-03-01-001	Leonard Canyon	22,405		9,245	
PW-03-01-003	West Chevelon Canyon	9,493		5,273	
PW-03-01-006	Wildcat Canyon South	6,972	5	993	
PW-03-01-011	Black Canyon	4,913	819	3,963	
PW-03-01-040	Mother Hubbard	2,656		922	
PW-03-01-042	Noland	7,843		333	
PW-03-01-049	Hot Air/Salt House	76,111			5,743
PW-03-01-050	Sheep Wash	7,965			1,259
PW-03-01-051	Painted Bluffs	44,106			6,896
PW-03-01-052	West Blue/San Francisco	156,437			32,538
PW-03-01-053	Cold Spring Mountain	17,541			4,790
PW-03-01-054	Hells Hole	15,524			4,856
PW-03-01-056	Chevelon Canyon North	6,678	2,244	4,372	
PW-03-01-057	Coal Creek	5,698			1,027
PW-03-01-058	Big Lue Mountains	5,222			1,172
PW-03-01-060	Centerfire	15,239		503	
PW-03-01-062	Chevelon Lake	6,585		596	
PW-03-01-063	Milk Creek	5,387	400	2,039	
PW-03-01-067	Sunset	30,365			17,755
PW-03-01-069-1	BRPA Exclusion 1	7,792		770	245
PW-03-01-069-2B	BRPA Exclusion 2b	6,958			3,404
PW-03-01-069-3	BRPA Exclusion 3	4,665			304
PW-03-01-069-4	BRPA Exclusion 4	10,404			2,032