

# EXHIBIT 14

**Bureau of Land Management, California Statewide Wilderness Study Report, Part 4,  
Vol. 4, Greenwater Range (CDCA 147) (1990) (excerpts) (available at  
[http://www.blm.gov/ca/pa/wilderness/wilderness\\_pdfs/wsa/Volume-4/vol-4-TOC.pdf](http://www.blm.gov/ca/pa/wilderness/wilderness_pdfs/wsa/Volume-4/vol-4-TOC.pdf)  
(last visited Jan. 16, 2007))**



Bureau of Land Management

# CALIFORNIA STATEWIDE WILDERNESS STUDY REPORT

1990

Part 4

Volume 4

*Contains WSA's: CDCA-137 through CDCA-222*

**Manly Peak**  
CDCA-137

**Middle Park Canyon**  
CDCA-137A

**Slate Range**  
CDCA-142

**Funeral Mountains**  
CDCA-143

**Resting Spring Range**  
CDCA-145

**Greenwater Range**  
CDCA-147

**Greenwater Valley**  
CDCA-148

**Ibex Hills**  
CDCA-149

**Ibex Spring**  
CDCA-149A

**Nopah Range**  
CDCA-150

**South Nopah Range**  
CDCA-150A

**Pahrump Valley**  
CDCA-154

**Owlshead Mountains**  
CDCA-156

**Little Lake Canyon**  
CDCA-157

**Owens Peak**  
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**Cow Heaven**  
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**Horse Canyon**  
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**Kelso Peak**  
CDCA-160B

**Skinner Peak**  
CDCA-160C

**Frog Creek**  
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**El Paso Mountains**  
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CDCA-173A

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**Newberry Mountains**  
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**Rodman Mountains**  
CDCA-207

**Bighorn Mountains**  
CDCA-217

**Morongo**  
CDCA-218

**Whitewater**  
CDCA-218A

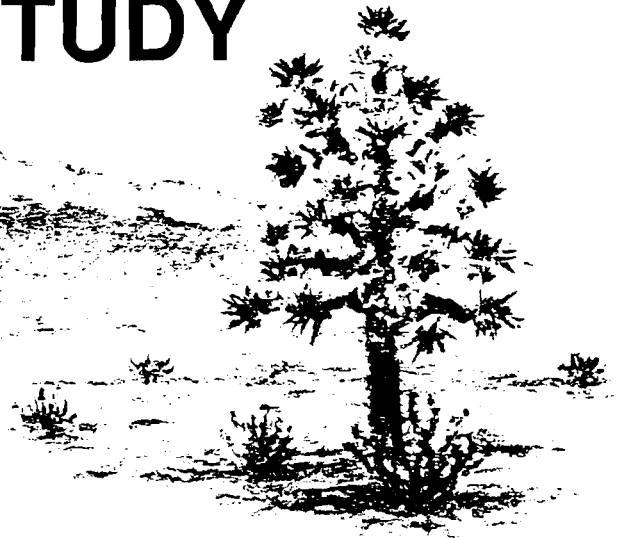
**Saddle Peak Mountain**  
CDCA-219

**South Saddle Peak Mountain**  
CDCA-220

**Avawatz Mountains**  
CDCA-221

**South Avawatz Mountains**  
CDCA-221A

**Kingston Range**  
CDCA-222



**Greenwater  
Range**

*CDCA 147*

**GREENWATER RANGE WILDERNESS STUDY AREA (WSA)**

**(CDCA-147)**

1. **THE STUDY AREA** --- 153,295 acres

The Greenwater Range WSA is located in Inyo County within the northeastern portion of the California Desert Conservation Area (CDCA). The community of Death Valley Junction is one and one-half miles to the north and the community of Shoshone is one and one-half miles to the south. The WSA includes 145,454 acres of public land under the jurisdiction of the Bureau of Land Management (BLM), 7,808 acres owned by the State of California, and 33 acres of private lands (see Map 1 and Table 1).

The WSA is bounded to the east by State Route 127 and to the south by State Route 178. Greenwater Valley Road and Death Valley National Monument form the western border. The northern boundary meanders across the Greenwater Range, avoiding existing surface disturbances from mining exploration and development and patented mining claims. The eastern portion of the northern border is a gravel access road to the Lila C borate mine). Portions of the WSA are within a future utility corridor (1990-2020) for the State of California as identified in the Western Regional Corridor Study (1980).

The Greenwater Range WSA is characterized by terrain ranging from smooth flat valleys and bajadas with a low elevation of 1,819 feet to jagged mountains with a high elevation of 5,148 feet. The area contains approximately 32% mountains, 25% alluvial fans, 20% dissected fans, 10% hills, 5% plateaus, 5% highly dissected fans, 2% badlands, and 1% riverwashes. Two major drainages divide the area into thirds. Through Greenwater Canyon, the waters have carved a narrow passage in the volcanic rock, leaving steep sides and a twisting course. At Deadman Pass, the erosion has produced a large, open expanse with gently sloping sides. Although the valleys are densely vegetated, the mountains and slopes tend to support only sparse growth. Creosote is the dominate plant in the area. Typical Mojave Desert species abound, including desert holly, sagebrush, prickly pear, cholla, and bunch and annual grasses. Virtually the entire Greenwater Canyon Area of Critical Environmental Concern (ACEC) is within the WSA. The ACEC comprises approximately three percent of the WSA.

The WSA was studied under Section 603 of the Federal Land Policy and Management Act (FLPMA). Four alternatives were analyzed in the Draft and Final Environmental Impact Statement (EIS) for the CDCA Plan: protection, use, balanced, and no action; a summary of the area's wilderness values was included in Appendix III of the Final EIS.

2. **RECOMMENDATION AND RATIONALE** ---
- |  |         |   |
|--|---------|---|
|  | 0       | acres recommended for wilderness        |
|  | 145,454 | BLM acres recommended for nonwilderness |

No wilderness is the recommendation for the Greenwater Range WSA. The entire acreage in this WSA is released for uses other than wilderness. Future activities in the area will be controlled by low intensity management as prescribed in the CDCA Plan. This recommendation will be implemented in a manner which will use all practical means to avoid or minimize environmental impacts.

The Balanced Alternative is the environmentally-preferable alternative as outlined in the CDCA Plan and further explained in the California Wilderness Study Overview.

The ability to explore and develop the area's mineral potential is of greater significance than the value of the area as wilderness. The area has only moderate scenic variety. Designation of the area as wilderness would not contribute any additional unique or distinct features to the National Wilderness Preservation System. Other WSAs in the California Desert that are recommended suitable offer a much more extensive and diverse representation of desert wilderness values.

The Greenwater Valley WSA and surrounding area has long been recognized for its known and potential mineral values. Over 10,150 acres of the WSA are encumbered by mining claims and over 2,550 acres are leased for oil and gas. There is currently very intense exploration for borate reserves in the WSA. Given the past history of the area, the likelihood for a major discovery is considered high. The WSA contains high potentials for borates and sand and gravel as well as moderate potentials for copper, pumicite, thorium, gold, silver, zeolites, barite, tufa, sand and gravel.

The entire area does not contain the high wilderness values characteristic of wilderness areas already within the National Wilderness Preservation System. The area also compares poorly in scenic splendor to other WSAs in the CDCA that are recommended suitable for wilderness designation. The naturalness of the area is diminished by the routes through Deadman Pass and Greenwater Canyon which are county-maintained roads, an extensive network of bladed seismic access routes, sand and gravel extraction sites and surface disturbances related to mining exploration. There are approximately 70.8 miles of routes of travel including primitive ways, washes and other unmaintained routes of access which will remain available for vehicular use.

The potential for increases in vehicle-dependent recreation is considered good. Current recreation use is low. The primary recreation use that occurs, such as rockhounding, camping, and hunting, are dependent upon vehicle access to traditional use sites.

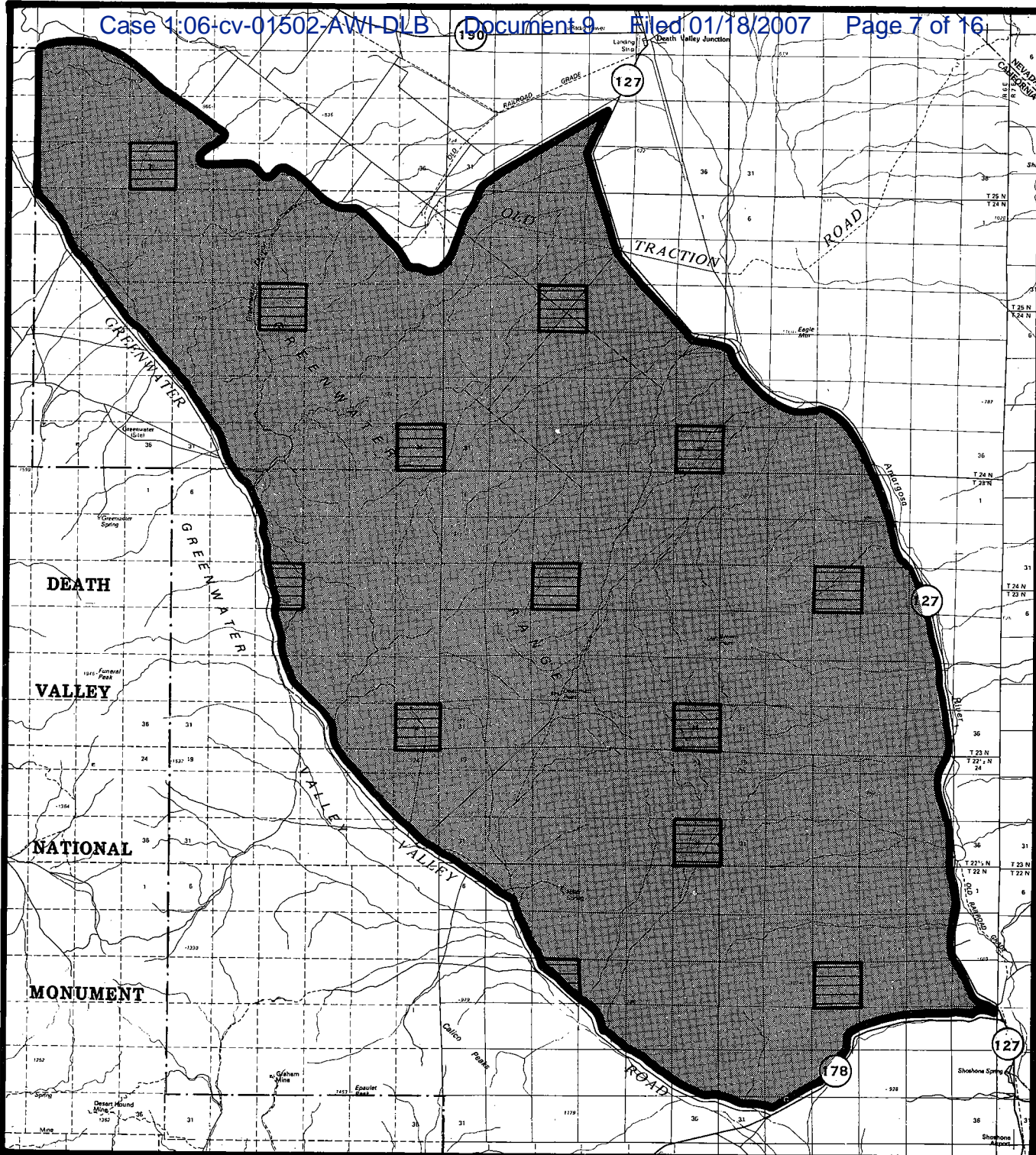
The wildlife and vegetative resources within the area are typical of the surrounding desert. The area contains no unusual plants or State or Federally listed threatened or endangered plant or animal species. The WSA contains two areas that contain transient desert bighorn sheep habitat.

Greenwater Canyon was designated an Area of Critical Environmental Concern by the CDCA Plan to provide protection of high quality cultural resources. The canyon contains 42 prehistoric occupation sites consisting primarily of rockshelters which contain 300-350 petroglyph elements. The ACEC management plan implements a management strategy that assures existing values will be maintained in the long-term.

Other portions of the WSA contain numerous village sites, including the old village site of Shoshone, and several berry collection areas used by some members of the Panamint-Shoshone and Chemehuevi.

TABLE 1 - Land Status and Acreage Summary of the Study Area

<u>Within Wilderness Study Area</u>		<u>Acres</u>
BLM	(surface and subsurface)	145,454
Split Estate	(BLM surface only)	0
Inholdings		
State		7,808
Private		33
Total		<u>153,295</u>
<u>Within the Recommended Wilderness Boundary</u>		<u>Acres</u>
BLM	(within WSA)	0
BLM	(outside WSA)	0
Split Estate	(within WSA)	0
Split Estate	(outside WSA)	0
Total BLM Land Recommended for Wilderness		<u>0</u>
Inholdings		
State		0
Private		0
<u>Within the Area Not Recommended for Wilderness</u>		<u>Acres</u>
BLM	(surface and subsurface)	145,454
Split Estate	(BLM surface only)	0
Total BLM Land Not Recommended for Wilderness		<u>145,454</u>



T25N  
T24N

T23N

T23N

T22  
1/2N

T22N

R3E | R4E

R4E | R5E

R5E | R6E



RECOMMENDED FOR WILDERNESS



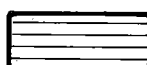
RECOMMENDED FOR NONWILDERNESS



LAND OUTSIDE WSA  
RECOMMENDED FOR WILDERNESS



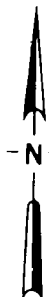
SPLIT ESTATE



STATE



PRIVATE



**Greenwater Range  
Proposal  
MAP-1**



3. CRITERIA CONSIDERED IN DEVELOPING THE WILDERNESS RECOMMENDATIONS

A. Wilderness Characteristics

1. Naturalness: The area is not natural in appearance. The area is characterized by two major drainages dividing a long, jagged, mountain range, and flat valleys and bajadas which are mostly void of human intrusions. However, scattered somewhat uniformly throughout the entire area, are surface disturbances which adversely affect the naturalness of large blocks of the WSA. Some of these disturbances include an extensive network of seismic routes that were bladed in the mid-1970's, two county-maintained roads (missed during the inventory) that divide the area into thirds, unauthorized mining activities that are currently in the process of being rehabilitated, a sand and gravel extraction site and evidences of mining exploration from the early 1960's.
2. Solitude: Opportunities for solitude are excellent. The terrain and vegetative variety provide areas where a sense of isolation and seclusion are readily available. On the bajadas, lack of vegetative screening and topographic diversity would reduce opportunities.

This WSA is periodically overflowed by military aircraft as part of the national defense mission taking place in approved military operating areas and flight corridors. The visual intrusions and associated noise create periodic temporary effects on solitude which are deemed necessary and acceptable as a part of the defense preparedness of the nation.

3. Primitive and Unconfined Recreation: The rugged mountains, canyons, and open bajadas lend themselves to opportunities for primitive and unconfined types of recreation. A published guide book describes peak climbing opportunities at Brown Peak. However, the large number of surface disturbances and the existing routes of travel throughout the WSA do have a limiting effect.
4. Special Features: The northern and southern portion of the WSA contains transient desert bighorn sheep habitat. The area also contains the Greenwater ACEC, noted for its spectacular archaeological values.

B. Diversity in the National Wilderness Preservation System

1. Assessing the diversity of natural systems and features as represented by ecosystems: This WSA contains 145,454 acres of the American Desert/Creosote Bush ecosystem. The Greenwater Range WSA would not increase the diversity of the types of ecosystems represented in the National Wilderness Preservation System.



Table 2 - Ecosystem Representation

Bailey-Kuchler Classification Domain/Province/PNV	<u>NWPS Areas</u>		<u>Other BLM Studies</u>	
	<u>areas</u>	<u>acres</u>	<u>areas</u>	<u>acres</u>
<u>NATIONWIDE</u>				
American Desert/Creosote Bush	1	343,753	117	4,122,455
<u>CALIFORNIA</u>				
American Desert/Creosote Bush	1	343,753	88	3,508,651

2. Expanding the opportunities for solitude or primitive recreation within a day's driving time (five hours) of major population centers: The WSA is within a five-hour drive of three major population centers. Table 3 summarizes the number and acreage of designated areas and BLM study areas within a five-hour drive of the population centers.

Table 3  
Wilderness Opportunities for Residents  
of Major Population Centers

Population Centers California	<u>NWPS areas</u>		<u>Other BLM Studies</u>	
	<u>areas</u>	<u>acres</u>	<u>areas</u>	<u>acres</u>
Anaheim-Santa Ana	25	2,823,534	153	5,703,616
Riverside-San Bernardino	22	2,031,054	205	7,658,649
<u>Nevada</u>				
Las Vegas	46	3,507,293	311	11,186,463

3. Balancing the geographic distribution of wilderness areas: The WSA is within 50 air miles of ten BLM WSAs recommended for wilderness designation. Two of these are located within the State of Nevada. The closest designated wilderness area is Golden Trout Wilderness, administered by Inyo National Forest, 80 miles west of the WSA.

C. Manageability

The Greenwater Range WSA is manageable as wilderness. However, several significant issues have a high potential to complicate manageability of the area for wilderness.

The WSA and surrounding areas have a long and intense history of mineral exploration and development. The area contains known mineral values. Full-scale development of any of the 488 mining claims has a high potential to impact wilderness values in significant portions of the entire WSA. Access requirements for such development would result in similar impacts. An oil and gas lease also affects 2,560 acres of the WSA.

Maintenance of designated county roads within a designed wilderness area would conflict directly with wilderness management.

Military overflights in this WSA must be considered to maintain the integrity of the existing and future national defense mission as well as the wilderness resource.

D. Energy and Mineral Resource Values

1. Summary of Information Known at the Time of the Preliminary Suitability Recommendation: The Greenwater Range WSA is located in the BLM Greenwater Range Geology-Energy-Minerals (G-E-M) Resource Area (GRA). BLM G-E-M data in the wilderness section of the Desert Plan EIS (Volume B, Appendix III) in 1980 indicated that mineral resource data for this WSA had not been fully analyzed, integrated, and interpreted, but that it had potential for copper-molybdenum porphyry deposits, uranium, pumice, sand and gravel, borates and lithium. Six unpatented mining claims were recorded with the BLM as of December 12, 1979.

The GRA report showed no recorded mineral production from the WSA in 1980. About one-third of the WSA could not be classified for industrial minerals because of insufficient information. GRA file data in 1980, showed three areas having moderate potential for the occurrence of copper, one in the northwest part, one in the north-central part, and one in the south-central part of the WSA, based on known occurrences. Two zones were identified in the northern part of the WSA as having high potential for the occurrence of borates. A small occurrence potential zone in the northwest corner is near a former borate producer known as the Widow Mine. An occurrence potential band along the northern edge of the WSA is adjacent to and near former producers including the Terry and Lila C borate mines. The Maria Mine is one of several undeveloped or inactive deposits in this vicinity and is just outside the WSA. The 1980 GRA file shows about 18 square miles in the western part of the WSA as having moderate potential for the occurrence of barite

based on known occurrences and geochemical anomalies. Barium values were greater than one standard deviation above the mean in the heavy mineral concentrates of nine stream sediment geochemical samples taken in the area.

The GRA report identified in 1980 a small area with moderate potential for the occurrence of tufa, a porous variety of calcium carbonate deposited by springs, near the Lila C Mine in the northern part of the WSA. Two areas were identified in the GRA file as having a moderate potential for the occurrence of thorium resources in the northern part of the WSA based on semiquantitative spectrographic analyses of geochemical samples from heavy mineral concentrates.

The GRA file classified the northern half of the WSA as having moderate potential for the occurrence of oil and gas based on the 1978 U.S. Geological Survey (USGS) classification as prospectively valuable. Under the BIM classification, the potential is "low" because the GRA is outside of the overthrust belt. Alluvial areas around the periphery of the WSA (excluding the central highlands) were classified in the 1980 GRA file as having moderate potential for the occurrence of sodium compounds based on the 1978 USGS classification as prospectively valuable. However, the GRA report states that, "leasable sodium and potassium resources are not known to exist within this GRA. Consequently, the potential for the occurrence of leasable sodium compounds in the WSA must be considered "low" under the BIM classification. The GRA file classified a small area (Evelyn site) on the eastern edge of the WSA as having high potential for the occurrence of sand and gravel resources based on past use of this material site by the California Department of Transportation.

The alluvium of the Amargosa River along the eastern edge of the WSA and next to Highway 127 was classified in the 1980 GRA file as having moderate potential for the occurrence of sand and gravel. Due to the cost of haulage, sand and gravel deposits near roads are more likely to be developed than those farther from roads. The GRA file classified an area in the northern half of the WSA as having low potential for the occurrence of pumicite based on a known deposit along Greenwater Canyon. The GRA report stated that the bed is 40 feet thick, consisting of about 99 percent pumice.

2. Summary of Significant New Mineral Resource Data Collected Since the Preliminary Suitability Recommendation Which Should be Considered in the Final Recommendation: No USGS or U.S. Bureau of Mines mineral survey was completed for this WSA because it is recommended nonsuitable for wilderness designation.

All but the southern tip of the WSA was assessed by the California Division of Mines and Geology (CDMG) and the results released in Open-File Report 86-10 SAC Mineral Land Classification of the Ash Meadows, Big Dune, Eagle Mountain, Funeral Peak, Pahrump, Bryan...

Quadrangles, (1986). This study supports the 1980 BLM GRA classification for borates identified on the accompanying mineral potential map (Map 2). The CDMG report classified an area about half-way between the mouth of Greenwater Canyon and Ryan (north edge of WSA) as having hypothetical resources for zeolites. This would be equivalent to moderate potential for occurrence of those resources under the BLM classification system. OFR 86-10 SAC classified the west-central part of the WSA as possibly containing undiscovered resources of barite. This area was classified as having moderate potential for occurrence in the BLM GRA file. An exploration plan of operations was filed in 1982 for barite and silver within this area. An area of at least one square mile warrants a "moderate potential for occurrence" rating based on high assay values for silver by an anonymous party, trench exposures, and the fact that the barite could probably be recovered as a byproduct if the precious metals were mined. OFR 86-10 SAC classified approximately this same area where the barite occurrences are known in the western part of the WSA as having hypothetical resources of copper, silver and gold produced by hydrothermal vein mineralization. This would be equivalent to moderate potential for occurrence under the BLM classification system.

The GRA file had identified an area having moderate potential for the occurrence of copper at the southern end of this zone. Since 1980, research has revealed that the right-of-way for Highway 127, bordering the eastern edge of the WSA, does not extend beyond the area of disturbance. Thus, CalTrans is dependent upon sand and gravel deposits in WSAs 147 and 145 as a source of aggregate for the maintenance of Highway 127 and associated erosion control dikes.

The CDMG report also shows three areas with hypothetical resources of pumicite in the northern half of the WSA. One of these was identified in the BLM GRA. The area identified in the 1980 GRA as having a low potential for the occurrence of pumicite was based on the remoteness and poor access to this area. However, market conditions have been known to change quickly and interest in the California Desert for lightweight aggregates has been strong during the period from 1986 to 1987. Therefore, a "moderate" potential rating is given to this area under the BLM classification system.

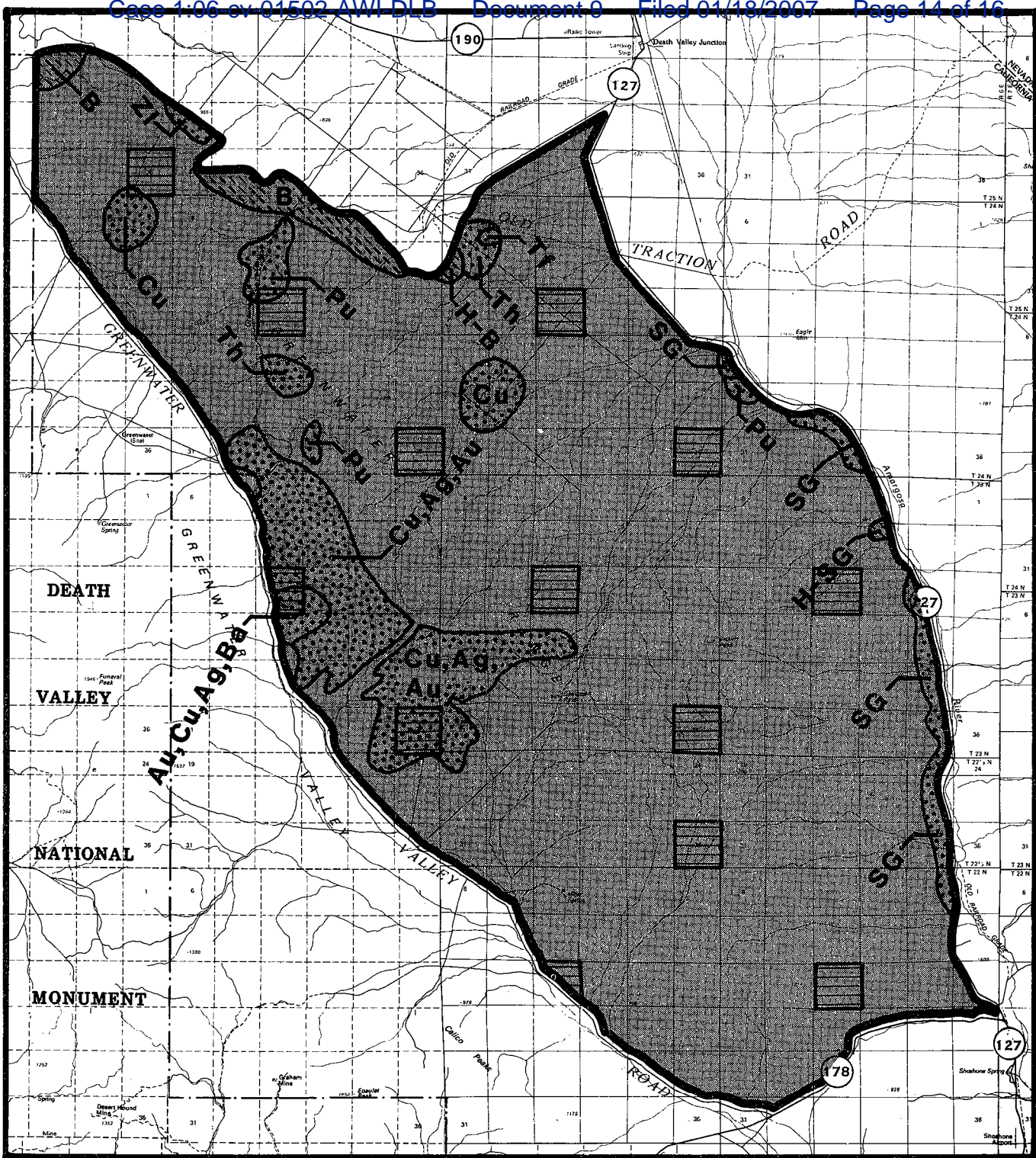
Unpatented mining claims and leases in the WSA are summarized in the following table, taken from BLM records dated December, 1987.

Table 4 - Mining Claims and Leases

TYPE	NUMBER			ACRES		
	SUITABLE	NONSUIT.	TOTAL	SUITABLE	NONSUIT.	TOTAL
<b>MINING CLAIM</b>						
Lode	N/A	465	465	N/A	9,300	9,300
Placer	N/A	22	22	N/A	880	880
Mill Site	N/A	1	1	N/A	5	5
<b>Total</b>	<b>N/A</b>	<b>488</b>	<b>488</b>	<b>N/A</b>	<b>10,185</b>	<b>10,185</b>
<b>Oil and Gas</b>						
Leases	N/A	1	1	N/A	2,560	2,560

## E. Summary of Environmental Consequences of the Proposed Action

1. Impact on Wilderness Values: Noise, surface disturbance and access requirements for mineral and energy exploration and development will negatively impact naturalness, solitude and primitive and unconfined types of recreation. Increases in vehicle dependent recreation use will also adversely impact values.
2. Impact on Minerals and Energy Exploration and Development: Opportunities for exploration and development of minerals and energy will continue to be available subject to applicable laws, regulations and the low and moderate intensity management guidelines established in the CDCA Plan.
3. Impact on Desert Bighorn Sheep Habitat: The two areas of transient sheep habitat within the WSA will continue to receive priority consideration over conflicting land uses according to the management prescription contained in the CDCA Plan. However, some adverse site-specific impacts on sheep habitat are likely to occur from mineral and energy development activities.
4. Impact on Future Utility Corridor Development: The WSA is within a future utility corridor (1990-2020) for the State of California as identified in the Western Regional Corridor Study (1980). This corridor was not identified or designated in the CDCA Plan. However, non-designation will not preclude any future development of this corridor. Future corridor development will be guided by the CDCA Plan.
5. Impact on Cultural Resource Values and Native American Concerns: Cultural resource values will continue to be enhanced and protected by the Greenwater Canyon ACEC Management Plan. However, some adverse site-specific impacts to cultural resources are likely to occur as a result of mineral and energy Development in the WSA. Vehicular access to traditional Native American collection sites in other parts of the WSA will continue to be available.



T25N  
T24N  
T23N  
T23N  
T22  
1/2N  
T22N

R3E R4E R4E R5E R5E R6E

<p><b>NONE</b> Recommended for Wilderness</p> <p> Recommended for Non Wilderness</p> <p> Land outside WSA Recommended for Wilderness</p> <p> Split Estate</p> <p> State</p> <p> Private</p>	<p><b>Explanation</b></p> <p> High Potential for the Occurrence of Energy and/or Non-energy Minerals</p> <p> Moderate Potential for the Occurrence of Energy and/or Non-energy Minerals</p> <p><b>M</b> Moderate Mineral Potential Location in a High Mineral Potential Area</p> <p><b>H</b> High Mineral Potential Location in a Moderate Mineral Potential Area</p>	<p><b>Commodity Symbols</b></p> <p><b>Ag</b> Silver</p> <p><b>Au</b> Gold</p> <p><b>B</b> Boron</p> <p><b>Ba</b> Barium</p> <p><b>Cu</b> Copper</p> <p><b>Pu</b> Pumice</p> <p><b>SG</b> Sand &amp; Gravel</p> <p><b>Tf</b> Tufa</p> <p><b>Th</b> Thorium</p> <p><b>ZI</b> Zeolite</p>	<p>↑ N ↓</p>
<p><b>Greenwater Range Mineral Resource Potential</b></p>		<p>0 1 2 3</p> <p>MILES</p>	<p><b>MAP-2</b></p> <p><b>CDCA-147</b></p>

F. Local Social and Economic Considerations

No local social or economic considerations were identified in the Final CDCA Plan and EIS. Therefore, no further discussion of this topic will occur in this document.

G. Summary of WSA - Specific Public Comments

Public comments were solicited throughout all phases in the development of the CDCA Plan, finalized in 1980. Issues raised by the public during the Inventory and Study Phase were taken into account during development of the Draft Plan Alternatives and Proposed Plan. The following is a summary of all comments received. Inaccuracies that are known to exist are noted in parentheses.

1. Inventory Phase: Several comments referred to man-made features and permanent scars from active and abandoned mining operations. These areas were deleted where appropriate. The Deadman Pass Road was mentioned several times, but field study showed that it had not been maintained for many years. Other comments indicated that too much land in the northern portion had been deleted and that rehabilitation should be considered.
2. Study Phase: Of the 27 responses received on this WSA, 17 favored wilderness designation. Two writers suggested that the area could be a natural entrance, or a buffer, to adjacent wilderness in Death Valley National Monument. Consolidation of the Greenwater, Nopah, and Resting Springs Ranges into one vast wilderness area was also suggested. Several respondents opposed the deletion of areas in the northern portion and urged that only the New Ryan Mine be excluded and other mines rehabilitated. Outstanding wilderness qualities in Greenwater Canyon included spectacular scenery, Indian petroglyphs and pictographs, and wildlife -- the red-tailed hawk, great-horned owl, and the desert bighorn.

Opponents of wilderness designation mentioned the many roads and evidences of mining activity which cover the WSA and which they believed were incompatible with a wilderness experience. The noise from overflights of military aircraft was listed as another detracting factor. One respondent said that the only thing the area has is miles and miles of alluvial fans covered by creosote bushes - not enough to warrant a wilderness designation.

Two letters were received in response to the Public Input Workbook (3/15/79). The National Park Service stated that WSA 147, along with WSA 148, was a compatible extension of unmodified lands meeting wilderness criteria within Death Valley National Monument. The second letter requested that the eastern boundary be moved three or four miles away from State Route 127.

3. Draft Plan Alternatives: The following range of public comments specific to this WSA was received in response to the Draft Desert Plan Alternatives. One stated that the entire study area and the northern half of the polygon should be recommended as suitable for wilderness under the Protection Alternative. A second view was that the entire WSA should be recommended for wilderness under the Balanced Alternative.

This WSA was one of those opposed by the National Outdoor Coalition, a coalition of mining, rockhounding and off-road vehicle groups. A large number of club members sent in printed coupons and letters supporting this position. The County of Inyo's Board of Supervisors also opposed wilderness because of mineral resources.

Conservation organizations and their members wrote many letters recommending wilderness designation for all WSAs within the CDCA. The Wilderness Society specifically mentioned WSA 147 as being suitable for wilderness, as did the State of California Department of Resources.

4. Proposed Plan: Comments on this WSA brought out the same points listed for earlier stages of the planning process. Motorized vehicle organizations and conservation groups maintained the same positions stated for the Draft Plan Alternatives, as did the County of Inyo Board of Supervisors.

No comments were received from local governments.