

# EXHIBIT 4

*BLM, Draft Wilderness Inventory Phase, Descriptive Narratives, CDCA  
(Nov. 1, 1978) (excerpts)*

**DRAFT**

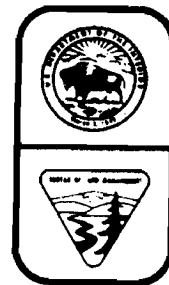
**WILDERNESS  
INVENTORY PHASE**

**Descriptive Narratives**

**California Desert Conservation Area**

**November 1, 1978**

**U.S. Department of the Interior  
Bureau of Land Management**



AREA 111I. PHYSICAL BOUNDARIES

The area is bounded on the north by Sylvania Canyon Road; on the east by the California/Nevada border; on the south by the Cucumungo Canyon Road; and, on the west by Eureka Valley Road.

II. LAND OWNERSHIP

The area is predominately public land, with only 3 percent of the area in random blocks of non-public lands.

III. DESCRIPTION OF ENVIRONMENT

The area includes the California portion of the Sylvania Mountains, consisting of rugged mountains of varying rock types dissected by several large washes. Elevations range from 5200 feet in the far northwest to 7998 feet near the southeast. Plant types are of the sage brush community at lower elevations and pinyon-juniper higher into the mountain range.

IV. NATURAL CONDITION

Mining occurs within the area to a very limited extent and on a small scale. Topographic screening virtually eliminates any impacts this mining might have on the natural conditions. The entire area lacks the imprint of man's work upon the landscape to a noticeable degree.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

The complex topography of the Sylvania mountains, in combination with good vegetative cover, provides ample screening for visitors. The available isolation provides an outstanding opportunity for solitude. The lack of permanent improvements which would significantly alter the primeval character and influence of the land also provides the visitor with outstanding opportunities for primitive and unconfined recreation.

AREA 112I. PHYSICAL BOUNDARIES

The area is bounded on the north by the Cucumungo Canyon Road; on the east, by the California/Nevada border; on the south by the Loretta Mine Road; and access road; and on the west, by the Eureka Valley Road.

II. LAND OWNERSHIP

This area is predominately public land with approximately 5 percent in random blocks of non-public lands.

III. DESCRIPTION OF THE ENVIRONMENT

The area is mountainous with many deep canyons and a few springs. The rock formation in the northwestern Cucumungo Canyon contains many reds, yellows, blues, and purples of eroding rock formations. The Last Chance Range elevation is primarily 5000-8456 feet, with many canyons of varied rock formations. The vegetative cover on the Eureka Valley bajada and mid-elevations of the Last Chance Range is primarily a mixed creosote desert shrub community. The higher elevations of the Last Chance Range are generally mixed desert shrubs with a pinyon pine/juniper forest type of vegetation.

IV. NATURAL CONDITION

This area has generally retained its primeval character and appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable. The noticeable works of man that are present have been excluded, such as the abandoned Crater Area mining operations and the Last Chance Spring Mine and access road. The extensive Crater Mining Area consists of many open pits, slag piles, and ways that significantly scar the natural condition of the area. The Last Chance Spring has a maintained access road, stock water source, building, and several open mining shafts. These areas have been excluded from wilderness consideration due to the substantially noticeable works of man which have degraded the natural condition of the immediate area.

This area contains outstanding opportunities for solitude, due to its relatively primitive character and natural condition. The many opportunities for solitude are provided by the extensive topographical variations and diverse vegetation which screen visitors providing freedom of movement without encroachment from man-made features. The varied topography and vegetation, along with the mountains and the lack of man-made features, provide for unconfined movement and diverse opportunities for a primitive type of recreation.

#### AREA 115

##### I. PHYSICAL BOUNDARIES

This area has as its eastern border Eureka Valley Road; as its southern border Loretta Mine Road; as its northern and western borders, Highway 168, and the boundary of the Inyo National Forest.

##### II. LAND OWNERSHIP

Approximately 94 percent of the land is public land. Non-public holdings occur in scattered single sections.

##### III. DESCRIPTION OF ENVIRONMENT

The area includes the northern end of Eureka Valley and surrounding mountains which include, to the east, the lower Sylvania Mountains and, to the north and west, the abruptly rising Inyo Mountains. The valley floor ranges in elevation from 3400 to 4400 feet and consists of a sage brush plant community. The Sylvania Mountains to the east rise to 6179 feet through the pinyon-juniper plant community. To the west, the Inyo Mountains rise to 8692 feet. Through this wide range of elevations several plant communities occur; from sage brush scrub to species associated with the white fir community. From the brushy valley floor, the Inyo Mountains have a Joshua tree woodland near the base. Cottonwood and willow dominate the lower canyons while the upper reaches of these mountains are capped with coniferous types.

##### IV. NATURAL CONDITION

The impact of man's work is substantially noticeable in some areas, primarily as a result of extensive mining. In the southeast corner, the valley floor is perturbed over a broad area of approximately 15 square miles. These assessment "scraps" reduce the apparent naturalness of this portion of Eureka Valley. Elsewhere, moderate mining activity has occurred. A small scale mining and access road is evident around Sugarloaf Mountain at the northern end of the area. Near the point where Loretta Mine Road leaves the Inyo Mountains and enters Eureka Valley, there is a relatively large-scale mining operation which is now apparently inactive. There are several mining pits and some large tanks for water and acid storage. These areas where the impact of man's work is substantially noticeable are excluded for further wilderness consideration. Generally, the area retains its apparent naturalness throughout. The mining activity that occurs is generally screened from visitors by the rugged topography of the Inyo Mountains and by the diverse vegetation types.

##### V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

The rugged topography of the Inyo Mountains and isolated canyons of the Sylvania Mountains provide ample separation from other visitors and afford an outstanding opportunity for solitude. From exposed slopes of these mountains, vistas of the Saline Range and other large features present to the visitor a feeling of vastness further enhancing the feeling of solitude. The area is composed of a diversity of terrain and vegetation challenging to different forms of primitive and unconfined types of recreation.

#### AREA 116

##### I. PHYSICAL BOUNDARIES

The western border is defined by Highway 168. Maintained dirt and gravel roads define the remaining boundaries.

##### II. LAND OWNERSHIP

The area is nearly all public lands. One non-public section is located in the northwest corner and is only partially within the boundary.

### III. DESCRIPTION OF ENVIRONMENT

The area encloses the southern end of the Inyo Mountains, the Santa Rosa Hills and the Santa Rosa Flats. These combine to provide a multitude of transitional areas and a constantly changing landscape. Generally, the southwestern portions are formed by bajadas which rise to meet the rugged volcanic lava flow known as the Malpais Mesa. The areas at the southern end are flat, rising to low rolling hills and the lava flow. Rugged valleys, deep canyons, sheer mountain sides, meadows and mesas can all be found within a short distance of each other. In the eastern section of the site, the transition to the Inyo Mountains is made by gradual landform changes between the Santa Rosa Hills and the Santa Rosa Flats. Plant life is as varied as the landform. On the western side, near Owens Dry Lake, vegetation is extremely sparse. Creosote, supported by low desert shrubs and grasses, dominates the bajada. The transition from desert creosote to mountain pinyon pine and juniper is unique. This change continues over the crest and down the eastern slope, where large stands of Joshua trees provide the transition back to a desert environment.

### IV. NATURAL CONDITION

The northern section of the site, in the vicinity of Cerro Gordo Peak has been extensively mined. Shafts, tailings, abandoned mining equipment and structures, plus a network of ways, lace the area. The impact of this activity has degraded the naturalness of the northern portion which has, therefore, been excluded from further consideration as wilderness. A road, extending from the western boundary of Highway 190, just south of the Soda Products Plant has also been excluded since it provides access to areas of mining activities. Mining activities are also evident in the southern portion of the roadless area. For this reason, the area south of the White Swan Mine and the road leading to the Santa Rosa Mine have also been excluded from consideration. The remainder of the site appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable.

### V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

The varied landform, together with the diverse vegetative patterns, provide numerous areas of isolation. The network of spaces generated by mountainsides, rock outcrops, depressions, washes, together with tall creosote, Joshua trees, pinyon pine and junipers insures outstanding opportunities for solitude. The area also provides users with outstanding areas where unrestricted movement in all directions is possible for wilderness oriented activities.

## AREA 127

### I. PHYSICAL BOUNDARIES

The area incorporates the entire northern portion of Panamint Valley and extends into the hills which surround the valley on the north, east, and west sides. Its northeastern limit is Death Valley National Monument and its southern border is Highway 190. A paved road, which runs through the Santa Rosa Hills, forms its western edge and an excellent, graded road extending into Hunter Mountain provides the northern boundary.

### II. LAND OWNERSHIP

Less than 4 sections of non-public land are scattered within the boundaries and account for less than 3 percent of the total land area.

### III. DESCRIPTION OF ENVIRONMENT

Generally, the site can be compared to a saucer. Panamint Valley represents the lower portion and includes a flat, dry lake bed, with only small mounds (Lake Hills) providing vertical relief. In the northern part, well up on the bajada, a relatively small, but extremely interesting, dune system is developing. To the west, the bright and varied colors of Rainbow Canyon provide an introduction to the unique topography of the higher elevations. Plateaus, low, rolling hills, bajadas, rocky outcrops, and rugged mountain canyons, valleys and peaks are all present to some degree. Vegetation is varied from the dry lake bottom, which provides too hostile an environment for most plant life, to the rich, lush pinyon-juniper forests on the highest peaks. Creosote, bunch grasses, desert holly, Joshua trees, plus a large number of annuals are all present and add to the diversity of the site.

IV. NATURAL CONDITION

Except for small portions where the effects of man's activities are present, the entire area has retained its natural condition and appears to have been acted on solely by the forces of nature. The Big Four Mine, below Panamint Butte, the Father Crowley Point Monument, the Lee Mines on Lee Flat, and the grazing operations on Hunter Mountain are the only evidence of man's work. The mines appear to be nonoperational, with only local impact. The Valley is occasionally used for supersonic flight tests. Signs have been posted to indicate the possibility of sonic booms.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

The overall diversity of terrain; areas of tall, dense vegetation; and, extreme elevation changes ensure numerous outstanding opportunities for solitude. Lack of evidence of man's works ensures unrestricted, outstanding opportunities for recreation.

AREA 129

I. PHYSICAL BOUNDARIES

Located to the west of Panamint Valley, the site's boundaries are formed by three paved roads and one graded and maintained dirt road. Highway 190 is the site's southern boundary; the Saline Valley Road provides the eastern border; and, the other two roads, which border the northern and western edges, are unnamed.

II. LAND OWNERSHIP

The site includes approximately two parcels of non-public land which account for roughly 10 percent of the total land area.

III. DESCRIPTION OF ENVIRONMENT

The roadless area is situated at the southern end of the Inyo Mountains and incorporates a variety of terrain ranging from flat to low rolling hills to rougher, mountainous landforms. Although not as highly eroded or rugged in appearance as some of the surrounding areas, the site does reflect some variation in the forms of shallow canyons and washes. Vegetation is limited throughout. Creosote and Joshua trees are the visually dominant plant life on the site. These are supported by typical, low, desert shrubs and grasses.

IV. NATURAL CONDITION

The southern portion of the site has been mined extensively in the past and the remains of abandoned operations are evident. Tailings, mine shafts, remnants of structures, debris and old machinery can be found throughout. The area is still supporting many active operations and the movement of both heavy equipment and trucks is common. Numerous claim markers, which are scattered throughout the area, indicate a potential for future expansion. The scope of past and present mining activities in the south has severely impacted the entire site. The extensive operations have degraded the naturalness of the area to the point where it does not meet minimum criteria for further consideration.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

Activities in the southern portion of the site severely limit any outstanding opportunities for solitude within the roadless area. The small size and restrictions imposed by ways, claims and mining in general, in addition to the lack of variety precludes any outstanding opportunities for primitive or unconfined recreation.

AREA 130

I. PHYSICAL BOUNDARIES

Located north of the Coso Mountain range the area's northern boundary is Highway 190. The eastern boundary is a maintained powerline road. The southern boundary is an improved dirt road, and the southwestern boundary is a maintained dirt road used for access to the Sierra Talc Mine.

The interior of the Resting Spring Range and the surrounding valleys are essentially pristine. Due to topographic variation, man's works, which include only a few primitive ways, are substantially unnoticeable. A small area at the very southern tip of the roadless area has been excluded from the area containing wilderness values to avoid a graded road to an active mine and structures on the west slope of the Resting Spring Range and a telephone line road. A short road to a ranch and mine enters the area from the north and has also been excluded.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

Opportunities for seclusion are provided in the rugged mountains and in the valley areas. A wide range of primitive recreation experiences are available, from the intimacy of small enclosed areas in the mountains to spaciousness of the valleys. The lack of encroaching manmade features adds to the unconfined character of the area.

VI. SUPPLEMENTAL CHARACTERISTICS

In terms of cultural history, the area contains 17 rock shelters where projectile points, metates, manos, cleavers, and choppers have been found. Five golden eagle and two prairie falcon nesting sites are known to exist in the area. In terms of vegetation, three rare, endangered or threatened species occur, including *Nitrophila mohavense*, a perennial forb; *Eriogonum bifurcatum*, an annual forb; and *cordylanthus tecopensis*, another annual forb. The *Nitrophila* occurs in a relatively pure stand.

AREA 146

I. PHYSICAL BOUNDARIES

This small, elongated area is bordered on its western flank by Highway 127; to the east, by a power line corridor and access road.

II. LAND OWNERSHIP

This small area consists primarily of public land, with approximately three-quarters of a square mile in the northern portion being non-public land.

III. DESCRIPTION OF ENVIRONMENT

This area consists of relatively flat and sparsely vegetated creosote-covered valley land and bajada.

IV. NATURAL CONDITION

Man's work is substantially unnoticeable within this area.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

Opportunities for solitude or a primitive and unconfined type of recreation are restrictive due to the flat topographic relief and sparse vegetation and limiting size and conformity which does not provide for unconfined freedom of movement.

AREA 147

I. PHYSICAL BOUNDARIES

The area is bounded to the north by Highway 190; to the south by Highway 178; to the east by Highway 127; and, to the west by a graded dirt road through Greenwater Valley.

II. LAND OWNERSHIP

The area consists primarily of public land. Non-public lands are scattered throughout, accounting for approximately 6 percent of the total area.

III. DESCRIPTION OF ENVIRONMENT

Roughly 12 miles across at its widest point and 32 miles long, this area encompasses approximately 300 square miles. Terrain varies considerably, ranging from smooth, flat valleys and bajadas to coarse, jagged mountains. Two major drainages divide the site into thirds. Through Greenwater Canyon the waters have carved a narrow passage through volcanic rock leaving steep sides and a twisting course. At Deadman Pass the erosion has produced a wide interspace with gently sloping sides. Although the valleys are densely vegetated, the mountains and slopes tend to support only sparse growth. Creosote is the dominant plant in the area, although numerous, less conspicuous, species abound, including desert holly, sage brush, prickly pear, cholla and bunch and annual grasses.

IV. NATURAL CONDITION

The northern boundary has been adjusted to exclude areas where man's impact has degraded the natural character. The exclusion includes active and abandoned mining operations, a graded road, and a network of unimproved ways. The graded road leads east from Death Valley Junction past the remains of the abandoned Lila C Mine (site of Old Ryan - now only tunnels, slag piles, and rusting equipment remain) to an area laced with old roads and mining claims at the mouth of Greenwater Canyon. A grid-like network of unimproved ways is located in the vicinity of the Lila C mine. At the site of the New Ryan, on the northern tip of the Greenwater Range, active and abandoned mining operations occur side-by-side. Tunnels, slag piles, and road scars exist here as well as many of the old structures that were once inhabited by the population of Ryan. The remainder of the roadless area generally retains its primeval character and appears affected primarily by the forces of nature. Man's works, which include a few abandoned mine shafts and primitive ways, are substantially unnoticeable due to screening from terrain diversity and fairly dense vegetation.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

This area offers outstanding opportunities for both solitude and a primitive and unconfined type of recreation. Terrain and vegetative variety provide many areas and spaces where a sense of isolation and seclusion are readily available. A relative lack of internal man-made features allows freedom of unconfined movement throughout the site. In terms of primitive recreation, the area offers both challenge and diversity. The Greenwater Range area is bounded to the east and west by large areas that are also relatively pristine, adding to the opportunities for a quality primitive experience.

VI. SUPPLEMENTAL CHARACTERISTICS

The area supports four raptor nesting sites including red-tailed hawks, common ravens and great horned owls. The Greenwater Range is transited by Bighorn sheep. The area includes about 100 petroglyphs which have remained intact. A number of ancient Indian caves can be found where pictographs adorn the walls.

AREA 148

I. PHYSICAL BOUNDARIES

The area is irregular in shape due to its location adjacent to Death Valley National Monument. Boundaries include a dirt road through Greenwater Valley to the east; Highway 178 to the south; and, the National Monument to the west.

II. LAND OWNERSHIP

The area consists almost entirely of public land. Only a few sections of non-public land exist within the roadless area, accounting for approximately 5 percent of the total area.

III. DESCRIPTION OF ENVIRONMENT

The area is dominated by the relatively gently sloping expanse of Greenwater Valley. To the south, the gentle, eastern slopes of the Black Mountains enter the area. Vegetation is lush and dense on the valley floor, but thins rapidly as it rises on the steeper mountain slopes. Creosote is the dominant plant, supported by sagebrush, annual and bunch grasses, seasonal wildflowers and scattered cholla cactus.



IV. NATURAL CONDITION

With the exception of a few primitive ways running through the roadless area, old mine sites, and scattered historic artifacts around the old mining town site of Greenwater, the area has remained in a natural state. Man's works are substantially unnoticeable due to the screening effects of the fairly dense vegetation, the area appears to be affected primarily by the forces of nature. Very few valleys in the California desert offer such a completely unobstructed, natural vista as does Greenwater Valley.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

The area offers outstanding opportunities for solitude and for a primitive and unconfined type of recreation. The relatively lush vegetation visually screens visitors from one another. Also, the lack of encroaching man-made features allows freedom of unconfined movement throughout the area. Its location adjacent to proposed wilderness areas in Death Valley National Monument and to the relatively pristine Greenwater Range further enhances opportunities for solitude and primitive recreation.

AREA 149

I. PHYSICAL BOUNDARIES

The area is bounded on the north by Highway 178; on the east by 127; on the south by a maintained dirt road and the Death Valley National Monument; and, on the west by Death Valley.

II. LAND OWNERSHIP

The site includes approximately eight parcels of non-public land scattered throughout the area and accounting for approximately 7 percent of the total area.

III. DESCRIPTION OF ENVIRONMENT

The dominant features are the Ibex Hills and Black Mountains. Through the horizontal rock layers browns, bright yellows, reds, and black produce a unique effect. Peaks along these two abutting mountain systems range between 3000 feet and 4752 feet on Ibex Peak. Greenwater Valley, just northeast of the mountain slopes, is two to four miles wide and six to eight miles long, supports a good creosote scrub plant community, and affords good views of the unique coloration of the adjacent Ibex Hills. In the northeastern corner are the Dublin Hills, forming a backdrop for the town of Shoshone.

IV. NATURAL CONDITION

Man's works dominate the landscape along the east side in a band two to three miles wide in the northern half and four to six miles wide in the southern half. In the area east of the Dublin Hills at the northern end of the roadless area surface rock on several hills has been scraped away, presumably for use as decorative stone. A dwelling and several small mining prospects are also present. Private development associated with the town of Shoshone is evident. Just east of the southern end of the Dublin Hills random bulldozer scars severely detract from the primeval character of the land. Five miles south of Shoshone a maintained dirt road penetrates one mile into the roadless area for access to microwave relay facility. Though considerably less improved, this road continues beyond the microwave site into Greenwater Valley where maintenance apparently ends. Within the first two miles beyond the microwave site numerous assessment holes dot the landscape. A wooden pole utility line enters the area near the microwave site and runs along the eastern border approximately one mile inside. Approximately four miles further south from the microwave site a well maintained gravel road and paralleling utility line run west five miles to two large, highly visible, talc mines located midway up the east side of the Ibex Hills. The white tailings are substantially noticeable from the east side of the roadless area. Scattered small scale abandoned mines and apparently unmaintained access routes are occasionally noticeable. The degree of contrast of these developments with the existing landscape is relatively unnoticeable. These developments do not significantly affect the primeval character of the landscape.

V. OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR A PRIMITIVE AND UNCONFINED TYPE OF RECREATION

The scenic openness of Greenwater Valley which is enclosed between the Dublin Hills and Ibex Hills and the long washes through the Ibex Hills and Black Mountains