EXHIBIT 17

Bureau of Land Management, California Statewide Wilderness Study Report, Part 4, Vol. 4, Greenwater Valley (CDCA 148) (1990) (excerpts) (available at 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

Part 4

1990

Volume 4

REPORT

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

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Little Lake Canyon CDCA-157

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Horse Canyon CDCA-160

Kelso Peak CDCA-160B

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Frog Creek CDCA-163

El Paso Mountains CDCA-164

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Kingston Range CDCA-222 Case 1:06-cv-01502-AWI-DLB Document 9 Filed 01/18/2007 Page 3 of 18

Greenwater Valley

CDCA 148

GREENWATER VALLEY WILDERNESS STUDY AREA (WSA)

(CDCA-148)

1. THE STUDY AREA ---

61,519 acres

The Greenwater Valley WSA is located in Inyo County in the northeastern portion of the California Desert Conservation Area (CDCA). The community of Shoshone is ten miles to the east. The WSA includes 58,500 acres of public land under the jurisdiction of the Bureau of Land Management (BIM), 2,589 acres owned by the State of California and 430 acres of private land (see Map 1 and Table 1).

The western boundary of this triangular WSA is administratively—endorsed wilderness in Death Valley National Monument (DVNM). State Highway 178 forms the southern border and the northeastern boundary is a dirt road through Greenwater Valley. Portions of the WSA are also within a future California utility corridor planned for 1990-2020 in the Western Regional Corridor Study (1980).

The area is characterized by the Calico Peaks mountains and a rugged eastern extension of the Black Mountains. These calico-colored mountains are dominated by volcanic, metamorphic and granitic rocks. The remainder of the WSA is dominated by the western slope of Greenwater Valley that flanks the precipitous Black Mountains. Elevations vary from 2100 feet at the eastern tip of the WSA to just over 5000 feet along the western border near Funeral Peak. Greenwater Valley is a vast, relatively undisturbed alluvial valley. The WSA contains 50% mountains, 30% alluvial fans, 10% dissected fans, 5% highly dissected fans, 3% pediments, and 2% hills. The vegetation is characteristically sparse and consists primarily of creosote bush scrub, desert holly scrub, and shadscale scrub.

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 Statements (EIS) for the CDCA Plan: protection, use, balanced, and no action, and a summary of the area's wilderness values was included in Appendix III of the Final EIS. A 1982 amendment to the CDCA Plan formulated a second partial suitability recommendation in which approximately 40% of the WSA was recommended suitable for wilderness.

2. RECOMMENDATION AND RATIONALE ---

24,158 acres recommended for

wilderness

35,689 BLM acres recommended

for nonwilderness

Partial wilderness (40% suitable) is the recommendation for the Greenwater Valley WSA. The BIM recommends that 22,811 Federal acres be included in the National Wilderness Preservation System (NWPS). The other 35,689 Federal acres in this WSA recommended nonsuitable are released for uses other than wilderness. In addition to the Federal acreage recommended for wilderness, BIM recommends that 1,347 acres of State land be acquired though exchange or purchase and designated as wilderness. With acquisition of these

inholdings, a total of 24,158 acres are recommended for wilderness. Appendix 1 lists all inholdings and provides additional information on their acquisition. 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.

The recommended suitable portion possesses an outstanding wilderness character that exemplifies the quality of criteria stated in Section 2(c) of the Wilderness Act of 1964. The area is natural in appearance. Permanent improvements and human intrusions have been either excluded from the recommended suitable area or are so insignificant as to not warrant attention. Opportunities for primitive and unconfined types of recreation are outstanding, and include backpacking, day hiking, peak climbing and nature studying. The opportunities for peak climbing and backpacking are confined only to the individual's endurance and outdoor skills. Due to the area's remoteness and rugged terrain, opportunities for seclusion from the "rest of the world" and opportunities for individuals to escape human influences are outstanding.

Wilderness values in the suitable portion are outstanding to the point of far outweighing alternative uses for other than wilderness. The adjacent administratively—endorsed wilderness in Death Valley National Monument (DVNM) will provide for continuity in management and law enforcement. Because wilderness values are so significant, the suitability recommendation will preclude any further vehicular use of approximately 21.32 miles of primitive access routes of travel.

Wilderness designation of the recommended suitable portion of the WSA will pose only one identified manageability issue. Acquisition of the State land along the perimeter will be essential to ensure protection of important wilderness values. This issue is not considered significant, because upon designation, the BLM anticipates a formal request by the State of California to exchange this land.

Within the recommended suitable portion 1) the boundaries are well defined; 2) there is currently little to no vehicle-dependent recreational use; and 3) the U.S Geological Survey (USGS) and U.S. Bureau of Mines (BOM) mineral reports indicated that there are no identified mineral values of moderate or high potential.

The entire WSA does not contain any unusual plants or any State or Federal listed threatened or endangered plant or animal species. The middle and southern portions of the WSA contains habitat for the desert bighorn sheep, a BLM sensitive species. There are no permanent surface streams, creeks or wells in the WSA. However, Montgomery Spring which is located on the eastern side of Salsberry Peak within the suitable portion, is an important water source for the sheep. The WSA contains no significant cultural resource values or Native American concerns.

The nonsuitable portion of the WSA does not compare with the scenic splendor of the suitable area. The extreme northern portion of the WSA was never recommended suitable because of mineral potential and impacts associated with an extensive patented mining claim, scars of adjacent mineral exploration, and the historic site of Greenwater. The central portion of the WSA was changed from recommended suitable to nonsuitable in a 1982 plan amendment to the CDCA Plan. Inyo County Board of Supervisors requested this change because of potentials for locatable minerals and the need to allow access on existing county roads.

Resource values in the administratively-endorsed wilderness in DVNM will not be negatively impacted if the nonsuitable portion of the WSA is released for uses other than wilderness. The values in the Monument are of sufficient caliber and size to stand on their own merit. There will be minimal long term changes to the natural environment in the majority of the nonsuitable portion of the WSA because of an overall lack of identified mineral potentials, and the low intensity land use prescription in the CDCA Plan for this area. During development of the CDCA Plan, DVNM officials had requested that access roads leading into the Monument, through the central portion of the WSA, be left open and available for vehicle use. However, ironically, Monument officials opposed the 1982 plan amendment which changed the recommended suitable portion and, therefore, made these roads available for use.

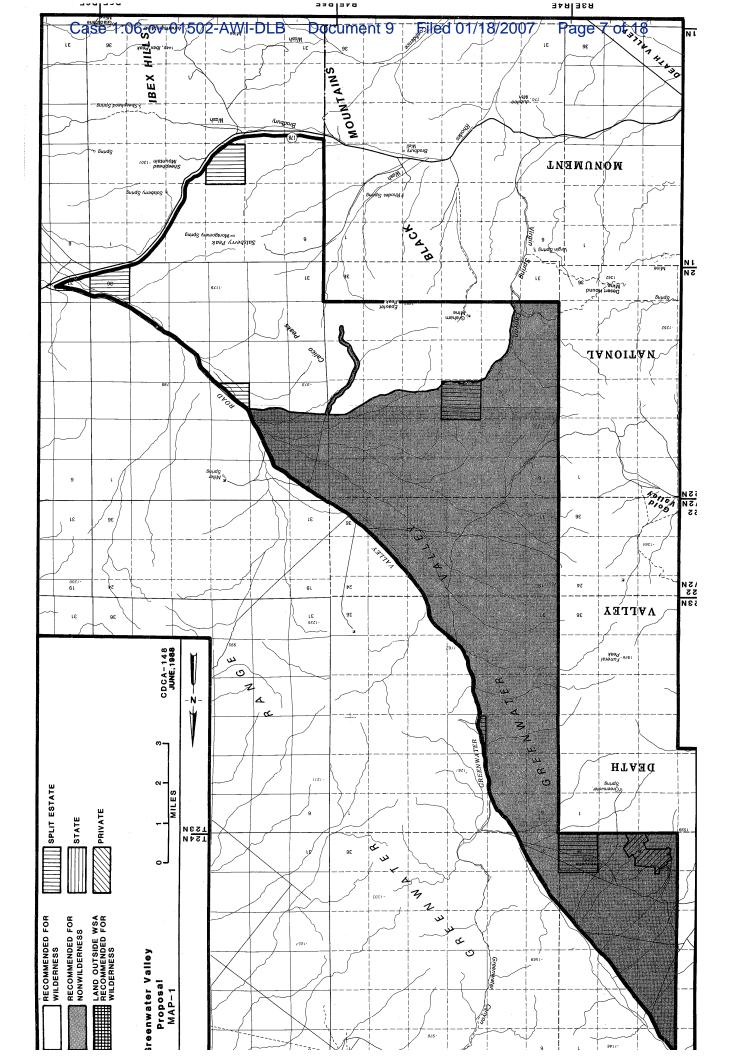


TABLE 1 - Land Status and Acreage Summary of the Study Area

Within Wilderness Stu	dv Area	Acres				
BIM	(surface and subsurface)	58 , 500				
Split Estate	(BIM surface only)	0				
Spire Escace	(BLY Surface Only)	U				
Inholdings						
State		2,589				
Private		430				
1117466						
Total		61,519				
Within the Recommende	d Wilderness Boundary	<u>Acres</u>				
BLM	(within WSA)	22,811				
BIM	(outside WSA)	0				
Split Estate	(within WSA)	0				
Split Estate	(outside WSA)	0				
		00.011				
Total BLM Lar	22,811					
1						
Inholdings ¹						
State		1,347				
Private		0				
Within the Area Not Recommended for Wilderness Act						
BLM	(surface and subsurface)	35,689				
Split Estate	(BLM surface only)	0				
•	· ·	05.600				
Total BIM Lar	d Not Recommended for Wilderness	35,689				

Appendix 1 is a detailed description of inholdings and split estate tracts included within the study. For purposes of this report, split estate lands are defined only as those lands with Federal surface and non Federal subsurface (minerals). Lands that have Federal minerals but non Federal surface should be classified in this report by the owner of the surface estate.

3. CRITERIA CONSIDERED IN DEVELOPING THE WILDERNESS RECOMMENDATIONS

A. Wilderness Characteristics

 Naturalness: The suitable portion of the Greenwater Valley WSA is characterized by rugged mountains that are relatively void of human intrusions such as Epaulet Peak within the Black Mountains. Salsberry Peak is also intrusion-free and dominates the adjacent Calico Peaks Mountains. A cherrystemmed road in the north-central portion of the suitable area, which provides access to the interior of the area, degrades naturalness to a small degree.

The nonsuitable portion of the WSA is generally a large bajada that slopes east from the Black Mountains in DVNM. The northern portion is heavily impacted from mineral exploration, development, and access routes associated with a large patented mining claim and the historic site of Greenwater. The central portion of the WSA is also recommended nonsuitable and contains several through access routes. In 1982, the Inyo County Board of Supervisors indicated that there was a need for access on these county roads.

 Solitude: The Calico Peaks area exhibits a complex system of canyons and rugged peaks which offer outstanding opportunities for solitude. Feelings of isolation can also be found in the extensive drainage networks surrounding Epaulet and Salsberry Peaks.
 Opportunities for solitude are further enhanced by the adjacent administratively—endorsed wilderness in DVNM.

The nonsuitable portion largely consists of a broad sloping bajada. On the bajada, opportunities for solitude are limited by lack of vegetative screening and uniform topography. The existing access roads, especially in the northern nonsuitable portion, are more readily visible at the higher elevations.

This WSA is periodically overflown 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. <u>Primitive and Unconfined Recreation</u>: The terrain in the suitable portion lends itself to unique opportunities including backpacking, mountain climbing on Salsberry and Epaulet Peaks, day hiking and nature studying. The cherrystemmed road has somewhat of a limiting affect.

However, opportunities are further enhanced due to management of the adjacent administratively-endorsed wilderness in DVNM.

The nonsuitable portion of the WSA contains many access roads that compartmentalize the area and tend to restrict opportunities for unconfined recreation.

4. Special Features: The eastern portion of the Black Mountains, which comprises approximately thirty percent of the WSA, contains a herd of the BLM sensitive desert bighorn sheep. Although the major portion of this mountain range is located within adjacent Death Valley National Monument, desert bighorn do utilize portions of the WSA located east of Funeral Peak on a permanent basis. This area is recommended nonsuitable. The recommended suitable portion of the WSA is utilized both on a seasonal and transient basis by this herd. Montgomery Spring near Salsberry Peak is an important water source within the suitable portion. The California Department of Fish and Game has estimated the herd size to be approximately 110 individuals.

B. <u>Diversity in the National Wilderness Preservation System</u>

1. Assessing the diversity of natural systems and features as represented by ecosystemsystem: This WSA contains 58,500 acres of the American Desert/Creosote Bush ecosystem. Although this ecosystem is already represented in the National Wilderness Preservation System, Greenwater Valley is a particularly distinct representation of this ecosystem.

Table 2 - Ecosystem Representation

		-4				
Bailey-Kuchler Classification Domain/Province/PNV	NWPS Areas areas acres		Other BIM Studies areas acres			
	NATTON	WIDE				
American Desert/Creosote Bush	1	343,753	117	4,209,409		
	CALIFORNIA					
American Desert/Creosote Bush	-1	343,753	88	3,595,605		

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 other BIM study areas within a five-hour drive of the population centers.

Table 3 Wilderness Opportunities for Residents of Major Population Centers

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

3. <u>Balancing the geographic distribution of wilderness areas</u>: The WSA is within 50 air miles of eight BLM WSAs recommended for wilderness designation. The closest designated wilderness area is Golden Trout Wilderness, administered by the Inyo National Forest, 85 miles west of the WSA.

C. Manageability

The recommended suitable portion of the Greenwater Valley WSA is manageable as wilderness. Only one issue needs to be resolved. The area contains several inholdings owned by the State of California. Acquisition of these inholdings is important strategically to the management of the area as a whole. However, based upon informal contact with the State Lands Commission, BIM will receive a request to exchange the inholdings as soon as the area is officially designated wilderness.

The boundaries are well defined, there are no identified mineral values of moderate to high potentials, and the adjacent administratively-endorsed wilderness in DVNM will provide for continuity in management and law enforcement.

A cherrystemmed Inyo County access route penetrates the northern portion of the recommended suitable boundary. Allowing motorized use of this route after wilderness designation will be a valuable asset to management of the remainder of the area as wilderness. It will allow opportunities for all segments of the population to gain access to the interior of the wilderness without degrading the area's wilderness integrity and it will allow law enforcement patrols access to ensure wilderness integrity and compliance with wilderness management policy and regulations.

Management of the nonsuitable portion of the WSA as wilderness would be difficult and complicated. This portion is not roadless. This portion of the WSA contains several County designated roads (missed during the inventory) and mining access routes that compartmentalize the area. These routes of travel negatively impact naturalness and opportunities

for primitive and unconfined types of recreation. The extreme northern portion of the nonsuitable area contains a large patented mining claim and surface disturbances associated with mining exploration and development. Due to the arid desert environment and the extent of the disturbances, natural rehabilitation will take many years.

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 Valley WSA (CDCA-148) is located in the BIM Greenwater Range Geology-Energy-Minerals (G-E-M) Resource Area (GRA). BIM G-E-M data in the wilderness portion of the Desert Plan EIS (Volume B, Appendix III) indicated in 1980 that resource data for this WSA had not been fully analyzed, integrated and interpreted. The EIS did indicate, however, that the WSA had potential for copper, uranium, sodium, and oil and gas. One mining claim was recorded with the BIM in the WSA as of December, 1979.

The 1980 GRA file indicated moderate potential for the occurrence of copper and barite resources in the northern part of the WSA where copper was mined in 1906 at the Greenwater site (20 tons of concentrate yielding 20% copper were recorded as being shipped). The GRA files classified the alluvium (valley fill) in the northern and northeastern part of the WSA as having moderate potential for the occurrence of sodium compounds. This was based on the 1978 U.S. Geological Survey classification as prospectively valuable (PV) for sodium coupled with known occurrences of saline minerals. The northern part of the WSA was classified by BIM in 1980 as having moderate potential for the occurrence of oil and gas based on the 1978 U.S. Geolgical Survey (USGS) prospectively valuable classification. The GRA files assessed the WSA as having insufficient data to classify for Uranium occurrence potential.

The 1980 BIM classification (GRA files) as "moderate" for the occurrence of sodium is unsupported by data in the GRA report. The Terradata Expert Panel felt that salines were "present or likely to be present," but they may have been considering the locatable borates known to occur in the Death Valley region. The GRA report states, "leasable sodium and potassium resources are not known to exist within this GRA." Based on the lack of known occurrences of sodium compounds, the potential for the occurrence of leasable sodium minerals in the WSA must be considered low under the BIM classification system.

2. Summary of Significant New Mineral Resource Data Collected Since the Preliminary Suitability Recommendation Which Should be Considered in the Final Recommendation: A mineral survey of the suitable portion of the WSA was conducted by USGS and BOM during the period from 1983

to 1985. The mineral potential for the portion of the WSA recommended suitable for wilderness designation was assessed by USGS and BOM in Bulletin 1709-B. The study reported two past producers in the southern part of WSA: 1) the Salsberry prospect which produced an unknown quantity of gold, silver, lead, and zinc (period of operation not reported); and 2) the Graham Jem Mine which produced less than one ton of high-grade ore containing gold valued at \$25,000 per ton in 1908. The study also reported several areas with low potential for the occurrence of metallic minerals (gold, silver, copper, lead, zinc and copper). The report concluded that the recommended suitable portion has low potential for the occurrence of borates and oil and natural gas resources. Since the area is well outside of the overthrust belt, the BIM classification for the WSA should be considered as a low potential for the occurrence of oil and gas resources under the BIM classification system.

Additional information on the WSA is furnished in California Division of Mines Open-File Report 86-10 SAC (1986), <u>Mineral Land Classification of the...Funeral Peak...Quadrangles...</u>. This report classifies an area near the Greenwater site (northern part of the WSA) as having moderate potential for the occurrence of barite and copper resources, respectively which supports the 1980 BIM GRA classification.

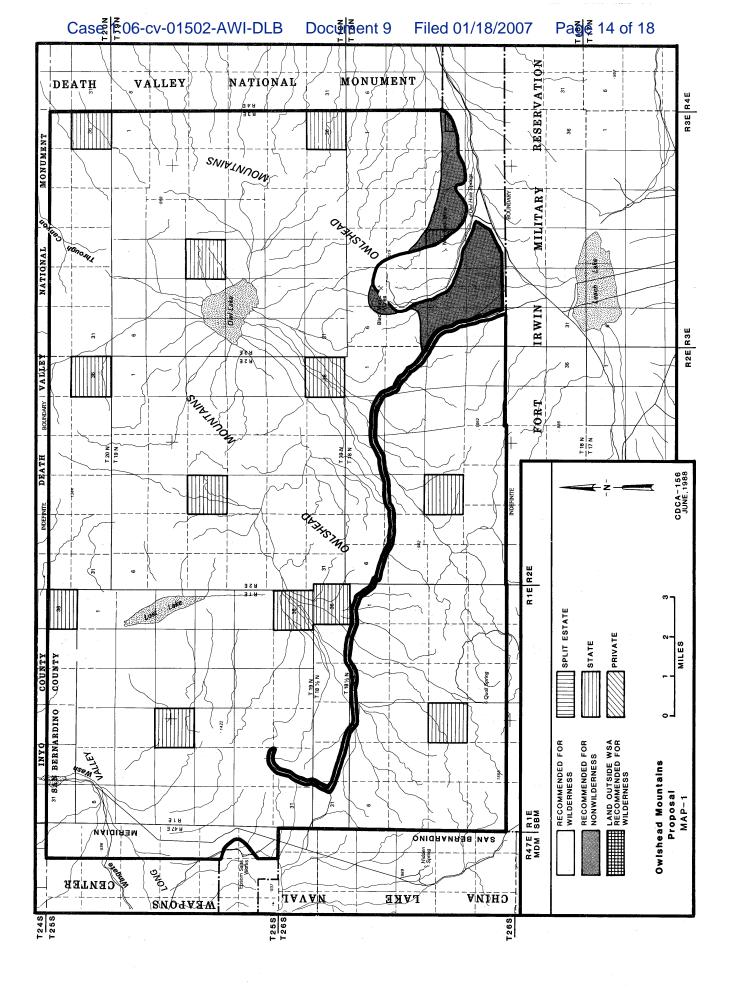
A plan of operations was filed in 1982 in the adjacent Greenwater Range WSA for silver and barite exploration east of the boundary of the recommended nonsuitable portion of the WSA. Based on high assay values by an anonymous party, and trench exposures in adjacent Greenwater Range WSA, the area surrounding this prospect, which extends into the WSA on the east boundary, is considered as having a moderate potential for the occurrence of silver and barite resources under the BIM classification system. The potential area may extend further westward beneath the alluvium in the WSA.

As of December, 1987, there were no unpatented mining claims in the WSA on record with the BLM.

E. Summary of Environmental Consequences of the Proposed Action

1. <u>Impact on Wilderness Values</u>: Existing high quality wilderness values will be maintained on the 40% of the WSA that is recommended suitable. Currently there are no mining claims in this portion, so the likelihood for any valid, existing mineral rights is very small.

In the portion of the WSA not recommended as suitable, naturalness and opportunities for primitive and unconfined types of recreation are not expected to decline appreciably. Only a small portion of the nonsuitable area has identified mineral values and the CDCA Plan stipulated that this area be managed under low intensity guidelines.



- 2. <u>Impact on Locatable Minerals</u>: The suitable portion has no identified mineral values at the moderate or high potential levels. Opportunities for exploration and development of locatable minerals in the nonsuitable portion will continue to be available subject to applicable laws, regulations and the low intensity management guidelines established in the CDCA Plan.
- 3. <u>Death Valley National Monument</u>: The suitable portion of the WSA will compliment existing management of the adjacent administratively—endorsed wilderness in DVNM. Releasing the nonsuitable portion of the WSA to uses other than wilderness will not adversely impact resources or the management of the adjacent administratively—endorsed wilderness as values within the monument are of significant quality to stand on their own merit.
- 4. Impact on Future Utility Corridor Development: The recommended-suitable portion of the WSA is within a planned utility corridor (1990-2020) as identified in the Western Regional Corridor Study (1980) for the State of California. This corridor was not identified or designated in the CDCA Plan. Depending upon the juxtaposition of the WSAs ultimately designated wilderness within the CDCA, there may or may not be constraints to future corridor development.
- 5. <u>Impact on Desert Bighorn Sheep Habitat</u>: All of the sheep habitat within the WSA will receive priority consideration over conflicting land uses according to the management prescription contained in the CDCA Plan for the area. Within the recommended-suitable portion, the potential for adverse impacts will be virtually nonexistent.

F. <u>Local Social</u> and Economic Considerations

No local social or economic considerations were identified in the 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. <u>Inventory Phase</u>: Comments noted the presence of old mining scars and activity as well as several Jeep trails. An on-the-ground visit led to the conclusion that these impacts did not have a significant influence on the natural values of the area.

2. Study Phase: Eighteen letters were received concerning this WSA. Eleven favored wilderness designation. Reasons given were:
(1) high wilderness potential due to contiguity with administratively—endorsed wilderness in Death Valley National Monument, (2) need for protection for bighorn sheep and other wildlife, and (3) general high quality of visual resources, ecology, geology and educational opportunities. Four of these respondents wanted some vehicle access, specifically the corridor to Gold Valley and the road to the historical mining town of Greenwater. One letter urged rehabilitation of the historical Greenwater mine site.

The letters opposing wilderness designation described sights and sounds such as mines, roads and lack of vegetation that they felt decreased the area's wilderness potential. Mining concerns discussed the need for access for exploration and development. Gold and copper were specific minerals mentioned.

Two letters were received in response to the Public Input Workbook for Wilderness Study Phase (3/15/79). The National Park Service recommended that the road into WSA 148 be left open as a wilderness corridor to provide access to Gold Valley.

- 3. <u>Draft Plan Alternatives</u>: The National Outdoor Coalition (NOC), a coalition of mining, rockhounding and off- highway vehicle groups, recommended that this area be designated unsuitable for wilderness, with the dunes portion open to vehicles. A large number of club members sent in printed coupons supporting the NOC position. Conservation groups supported wilderness designation for the entire WSA. Comments were largely concerned with motorized vehicles either the need for access for recreation or mineral exploration and development (including oil, gas, and geothermal), or the need to protect the sensitive natural values of the area from vehicular damage. The Board of Supervisors of Inyo County requested a nonsuitable (Multiple Use Class "M") designation for this area because of mineral resources.
- 4. <u>Proposed Plan</u>: There were almost no specific comments on this particular WSA in response to the Proposed Plan. Motorized vehicle groups and conservation organizations maintained the same positions stated for the Draft Plan Alternatives, as did the Inyo County Board of Supervisors.
- 5. 1982 Plan Amendments: In 1982, the Inyo County Board of Supervisors proposed a change in designation for the northern two-thirds (35,180 acres) of this WSA from Multiple Use Class "C" (suitable for wilderness) to Class "L" (limited Use) Reasons given were: (1) potential for locatable minerals and (2) the need for access on existing County roads. The amendment was approved.

Two hundred twenty comments were received on the Draft Environmental Impact Statement on this proposal; seven in favor and 213 opposed, including a petition of 27 signatures. Many of those against the amendment urged that consideration of this proposal be postponed until the USGS had completed mineral studies. Others pointed out that mineral potential was low, according to BIM data, and was therefore an insufficient reason for deleting the thirteenth highest-rated WSA in the California Desert.

Governmental agencies opposed to the amendment were:

National Park Service - Death Valley National Monument State of California Department of Resources

Organizations opposing the amendment included: None

Respondents favored the amendment citing no particular reasons.

APPENDIX 1 ESTIMATED COSTS OF ACQUISITION OF NON-FEDERAL HOLDINGS WITHIN AREAS RECOMMENDED FOR DESIGNATION GREENWATER VALLEY WSA (CDCA-148)

	TYPE OF OWNERSHIP BY ESTATE								ESTIMATED COST OF ACQUISITION			
PARCEL No.		LEGA ESCRII RNG :	PTIO	ON MERIDIAN	TOTAL ACREAGE	NUMBER OF OWNERS	SURFACE ESTATE	SUBSURFACE ESTATE	PRESENTLY PROPOSED FOR ACQUISITION	PREFERRED METHOD OF ACQUISITION	LAND COSTS (\$1000)	PROCESSING COSTS (\$1000)
1 2 3	21N. 22N. 22N.	5E. 5E. 5E.	16	SBM SBM SBM	560 320 480	1 1 1	STATE STATE STATE	STATE STATE STATE	YES YES YES	EXCHANGE EXCHANGE EXCHANGE	N/A N/A N/A	4.0 4.0 4.0

These figures were derived from Bureau Land Records and provide for more detail than GIS estimates and therefore may differ from acreage summaries in Table 1.