MASSACRE RIM WILDERNESS STUDY AREA

1. THE STUDY AREA - 101,290 acres

The Massacre Rim WSA (CA-020-1013) is located in Washoe County, Nevada in the northwestern corner of the State. The WSA includes 101,290 acres of BLM lands and surrounds 784 acres of private inholdings (Table 1). The nearest major towns and cities are Cedarville, California (30 miles west), Susanville, California (105 miles southwest) and Reno, Nevada (150 miles south). The WSA is bounded by the Sheldon National Wildlife Refuge, Nevada Highway 34, private lands, the Cottonwood Canyon Road, the Bald Mountain Canyon Road and the Bitner and Bitner Butte Road on the northern portion. On the south side the WSA is bounded by Nevada Highway 8A, the Salt Grass-Evans Road, private property, the West Lake-Johnson Reservoir Road, the Little Basin Spray Road and a 750 KV powerline. All of the listed roads except the Nevada highways are infrequently maintained dirt roads. Highways 34 and 8A are well maintained gravel roads. The refuge boundary is a fenceline.

The WSA includes all of the Massacre and Bitner benches; the southern slopes of the benches and the Massacre Rim, a large fault block. The topography is generally rolling, open terrain dominated by sagebrush, with juniper stands scattered on the western portion of the WSA. Massacre Rim is a 1,200 foot fault block exposure which dominates the northwestern portion of the WSA. Elevations within the WSA range from 5,520 to 6,780 feet.

The WSA was studied under Section 603 of the Federal Land Policy and Management Act (FLPMA) and was included in the Eagle Lake-Cedarville Final Environmental Impact Statement finalized in October, 1987, which amended the Cowhead/Massacre Management Framework Plan. There were five alternatives analyzed in the EIS; all wilderness alternative, no wilderness and three partial wilderness alternative. One partial wilderness recommended 22,465 acres be designated as wilderness and 78,825 acres released for uses other than wilderness, including a 44,870 acre ACEC to protect and manage cultural resources (this is the recommendation of this report). Two other partial wilderness alternatives were also considered: a partial wilderness where 83,951 acres would be designated as wilderness and 17,339 acres would be released for uses other than wilderness and a partial wilderness where 56,391 acres would be designated as wilderness.

2. <u>RECOMMENDATION AND RATIONALE</u> - 22,465 acres recommended for wilderness 78,825 acres recommended for nonwilderness

The recommendation for the Massacre Rim WSA is to designate 22,465 acres as wilderness and release 78,825 acres for uses other than wilderness (Map 1). Approximately half of the wilderness area not recommended for wilderness (44,870 acres) is proposed to be managed as an Area of Critical Environmental Concern (ACEC) to provide special protection and management to the significant cultural resources found on the Massacre Bench. All wilderness is considered to be the environmentally preferable alternative because it would result in the least change from the natural environment over the long term. The partial wilderness alternative, the recommendation of this report, would be implemented in a manner which would utilize all practical means to avoid or minimize environmental impacts. The recommended wilderness encompasses the highest wilderness values in the WSA, including outstanding naturalness and opportunities for primitive and unconfined recreation and solitude. The area released for non-wilderness uses includes human disturbances related to project development, woodcutting and vehicle ways. This portion of the WSA also has some mineral potential associated with a historic mining district.

The 22,465 acres recommended for wilderness designation contain a wide range of values and a lack of significant resource and management conflicts which make them well suited for wilderness designation. The values of the area include exceptional naturalness, opportunities for solitude, a range of primitive recreation activities and an important range of wildlife values. The lack of resource and management conflicts would assure that no significant resource development opportunities would be foregone or that management of the area to preserve its wilderness values would be difficult if designated as wilderness.

The recommended wilderness includes almost all of the Bitner Table area and the open ridges and drainages to the north of the Table. The table-lands are broken by low rims, small buttes and several short narrow canyons. The vegetation is a mixture of three types of sagebrush and a wide range of other species of the Great Basin flora. Although, the area does not have the kinds of highly distinctive land forms which are commonly associated with spectacular scenery, it does have unique features which warrant wilderness designation.

3.

The boundary of the recommended wilderness is essentially the boundary of the Bitner Grazing Allotment. The correspondence between wilderness and allotment boundaries was made for several reasons. The Allotment has better range conditions than many allotments in the surrounding area due to a past lack of livestock water. The better range conditions contribute significantly to the overall naturalness of the recommended wilderness. The naturalness of the recommended wilderness portions is also reinforced by the relative lack of imprints of man. The only man made projects are a few small stock ponds and spring developments, which do not affect the overall naturalness. These water developments do improve summer water availability to wildlife, particularly antelope and mule deer, allowing higher population levels than would occur without the projects. The other reason that the wilderness recommendation and the allotment boundary correspond is wilderness manageability. The nature of the edges of the Bitner Table are such that maintaining an area free from cross country vehicle travel would be difficult. Use of the Allotment boundary fenceline provides a continuous, distinctive on the ground boundary for the wilderness recommendation.

Excellent scenic vistas of up to 60 miles are provided from many locations within the recommended wilderness. The screening provided by the topographic breaks and the lack of visitor use combine to create an impression of isolation from the civilized world. This isolation provides outstanding opportunities for solitude.

The recommended wilderness represents one of the few places in northwestern Nevada where hunting is not based upon the 4-wheel drive vehicle. This is due to the lack of vehicle access to the area. This forces hunters to walk or to use horses to access the area, resulting in a better quality of hunt for sage grouse, mule deer and antelope. This type of primitive recreational experience is becoming more popular with hunters who seek to get away from the much more common vehicle hunters.

Because of the limited nature of the hunting and the good conditions of the vegetation, the recommended wilderness has higher densities of sage grouse than surrounding areas and the mule deer and antelope are commonly in the trophy classes.

The conflicts with other resource uses in the recommended wilderness are limited. Grazing use on the area will be allowed to continue. The minor intrusions associated with livestock water facilities will remain due to regular maintenance activities. There are no activities proposed on the 120 acres of private lands which would impair wilderness values. The USGS/BLM minerals survey indicate a moderate potential for gold, silver, mercury and uranium, but no claims have been filed.

The 78,825 acres of the WSA recommended for uses other than wilderness have significantly lower naturalness and opportunities for primitive recreation than the portion of the WSA recommended as wilderness. The special values of exceptional archaeological values would be better managed under an ACEC designation which would permit extensive excavations and a public interpretation and education

program. The non-wilderness lands have several resource conflict areas including a fuelwood harvest area, a historic mining district, several vegetative conversion projects for livestock and numerous small projects which would require regular maintenance activities. Management of portions of the area released for uses other than wilderness would be difficult due to the lack of effective barriers to cross country vehicle travel. Based upon all of the factors listed, it was determined that the needs of the area would be best served if the area were released from wilderness consideration.

The area released for uses other than wilderness (Area A, B and C) consists of the Massacre Bench, the Massacre Rim and the slopes below the bench areas. These areas contains most of the human imprints including small reservoirs (Area A, B and C), sagebrush eradication projects (Area A), a fuelwood harvest area (Area C), bladed fencelines (Areas A, B and C), a cherrystem road and numerous vehicle ways. In order to continue the authorized levels of grazing, the projects require periodic maintenance which will result in a continuing influence on the landscape over the long term. The retreatment of the sagebrush eradication projects (Area A), three areas totalling 4,500 acres, would maintain these areas in an unnatural condition. The sagebrush eradication projects existed prior to the inventory. They were mistakenly included in the WSA. The unnatural character of the projects should have resulted in the project areas being deleted from the WSA. These projects are important to grandfathered grazing use within several allotments and will require retreatment in the future to maintain forage levels. Overall, Area B is in a natural condition, the human imprints are generally small scale and well scattered.

The resource conflicts in the area released for uses other than wilderness are relatively localized. One additional sagebrush eradication project of 700 acres is proposed in the southern portion of the WSA (Area D). Large scale archaeological excavations are proposed at eight to ten sites in the proposed cultural resource ACEC (Area B). Each excavation could disturb a quarter acre resulting in unnatural conditions at each site. Continuation of woodcutting for fuelwood in the western portion of the WSA would reduce naturalness on approximately 1,000 acres. The anticipated development of a mine at the northern edge of the WSA would eliminate naturalness on approximately 300 acres (Area E).

Solitude and opportunities for primitive recreation would generally be retained in the non-wilderness area recommended for uses other than wilderness. Development of a mine, fuelwood cutting, range project maintenance and sagebrush control would locally reduce opportunities for solitude and primitive recreation for short periods of time in localized areas. Continuing cross country vehicle travel on the southern portions of the WSA and the western half of the Massacre Bench would result in slight reductions of solitude.

In summary, it was determined that the area with the highest wilderness values, especially naturalness, and the fewest resource conflicts would be best managed as wilderness. The portion of the WSA which past uses and projects associated with livestock grazing, mineral extraction, fuelwood harvest and protection and management of significant archaeological values would be better served by release for uses other than wilderness.

<u>Within Wilderness Study Area</u> BLM (surface and subsurface) Split Estate (BLM surface only) Inholdings (private) Total	101,290 0 <u>784</u> 102,074
Within the Recommended Wilderness Boundary	
BLM (within WSA)	22,465
BLM (outside WSA)	0
Split Estate (within WSA)	0
Split Estate (outside WSA)	0
Total BLM Land Recommended for Wilderness	22,465
Inholdings (State and private)	120
Within the Area Not Recommended for Wilderness	
Sector BLM	78,825
Split Estate	0
Total BLM Land Not Recommended for Wilderness	78,825
Inholdings (State and private)	664

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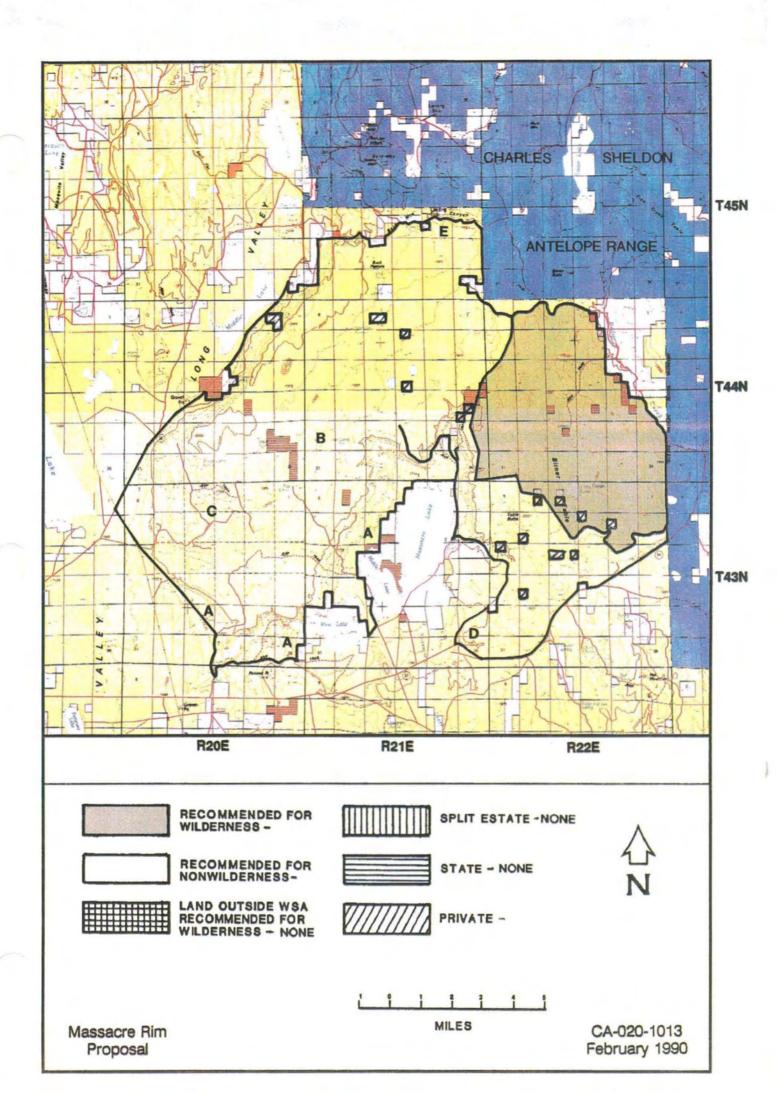
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 Table 1

 Land Status and Acreage Summary of the Study Area

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3. CRITERIA CONSIDERED IN DEVELOPING THE WILDERNESS RECOMMENDATIONS

Wilderness Characteristics

A. <u>Naturainess</u>: The western edge is formed by a spectacular fault scarp with huge rims above vegetated talus slopes. The WSA is primarily natural in character. The remainder of the area consists of a series of wide benches generally sloping gently toward the south. The benches are covered primarily by great expanses of grey/green low sagebrush not exceeding two feet in height. Pockets with deeper soils support western juniper and big sagebrush. Several small but important spring fed meadows form islands of green in the rocky, shallow soils. Pronghorn antelope are a commonly seen inhabitant on the benches. Mule deer are less common, associated with taller brush and juniper sites. The apparently harsh environment has been home for humans for at least 10,000 years as witnessed by the large number and wide diversity of archaeological sites found in the area. Site types include hunting blinds, petroglyphs and stone quarries. Man caused imprints are not uniformly distributed within the Massacre Rim WSA. The eastern two-thirds above the rim contain few man related intrusions while the western third and the southern and northern boundary areas contain practically all of the man caused intrusions. These portions of the WSA correspond to the recommended wilderness and the recommended nonwilderness respectively.

Areas A - E contains the majority of man's imprints in the WSA. These include land treatments (sprays and/or seedings) on the west and southwest extremes of the WSA (Area A), extensive roads and ways (19 miles), a large fuelwood cutting area (Area C), fences, small reservoirs, and external influences. This area is the least natural unit of the WSA. Judging from public input to WSA designation and during the study phase, the overall influence of man's imprints on the naturalness of Area C would be substantial to the average visitor.

Ways (10 miles) are concentrated on the west boundary. Fences are substantially unnoticeable in the recommended wilderness but are noticeable in Areas A, B and C due to the bladed fencelines. Livestock water projects are small, widely scattered and are not considered to have a noticeable impact on the naturalness of the recommended wilderness.

B. <u>Solitude</u>: The Massacre Rim WSA contains out-standing opportunities for solitude. The large size of the Massacre Rim WSA allows for solitude. The terrain and vegetation do not provide a significant degree of screening, however, the vastness of the WSA would allow a moderate number of visitors to enjoy solitude. The lack of topographic and vegetative screening precludes the opportunities for absolute seclusion. The opportunities for solitude are better on the recommended wilderness portion of the WSA due to a lack of vehicular access.

C. <u>Primitive and Unconfined Recreation</u>: The vastness of the Massacre Rim WSA contributes to limited opportunities for wilderness type recreation such as hiking, backpacking and camping. Excellent wildlife values also provide opportunities for viewing and hunting. A lack of perennial lakes or streams throughout the WSA precludes recreational values such as fishing.

D. <u>Special Features</u>: The WSA contains outstanding cultural resources associated with 10,000 years of human occupancy in the Massacre Lakes Basin. A wide range of site types are found on and around the Massacre Bench. The sites are proposed for excavation, preservation and public interpretation depending upon their type, condition and location. Extensive excavation of approximately ten sites has been proposed. These excavations would require surface disturbance of up to several acres per site and a field camp for 15 to 20 persons for at least one field season. Many of the sites and groupings of sites are eligible for the National Register of Historic Places due the unique and special research values the sites provide.</u>

Diversity in the National Wilderness Preservation System

A. <u>Assessing the diversity of natural systems and features as represented by ecosystems</u>: Wilderness designation of the Massacre Rim would not add a new ecosystem to the National Wilderness Preservation System or to Nevada. This WSA is in the sagebrush-steppe desert ecosystem. At the present time, there are four existing wilderness areas; Jarbidge and Santa Rosa in Nevada, South Warner in California and Craters of the Moon in Idaho, within this ecotype. This information is summarized in Table 2.

	Table Ecosystem Re			
Bailey-Kuchler Classification Domain/Province/PNV	<u>NWPS</u> Areas	Areas Acres	Other BL Areas	M Studies Acres
Intermountain Sagebrush Province Sagebrush Steppe	NATION	IWIDE		
	4	131,199	138	4,356,340
Sagebrush Steppe	<u>NEV4</u> 2	<u>NDA</u> 86,907	34	1,252,442

B. 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 four major population centers. Table 3 summarizes the number and acreage of designated areas and other BLM study areas within a five hour drive of the population centers.

Population Center	NWPS	Areas	Other BLM Studies		
	Areas	Acres	Areas	Acres	
<u>Nevada</u> Reno	45	4,967,230	175	6,945,487	
<u>California</u> Redding	14	1,236,503	11	344,633	
Oregon Medford	31	2,440,081	21	730,038	
<u>Idaho</u> Boise	22	937,766	172	5,127,039	

Table 3Wilderness Opportunities for Residents of Major Population Centers

C. <u>Balancing the geographic distribution of wilderness areas</u>: The Massacre Rim WSA would contribute to the geographic distribution of areas within the National Wilderness Preservation System in Nevada. The WSA is within a 50 mile radius of 6 BLM WSA's recommended for wilderness designation. The South Warner Wilderness, administered by the Modoc National Forest is the only designated wilderness area within 50 miles of the WSA. Designation of the WSA would provide the public a wilderness opportunity in northwestern Nevada.

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Manageability (the area must be capable of being effectively managed to preserve its wilderness character).

The entire Massacre Rim WSA could be managed as wilderness if designated. The area recommended for wilderness can be managed as wilderness. Ways are present but effective closures can be erected. The area does not contain any identified mineral values or mining claims, therefore the greatest concerns lie with three tracts of private inholdings. If any of these lands are developed, access routes would be required. The development and use of these routes could impair the BLM's ability to manage the adjacent public land as wilderness. The recommended wilderness is manageable in spite of these concerns for the following reasons: It is highly probable these tracts will never be developed. The tracts are located along the southern boundary of the recommended wilderness, and should they be developed, they would not directly affect the central core of the wilderness area.

The portion of the WSA recommended for release for uses other than wilderness could also be managed as wilderness. However, several parts of the area including the southern area and the western half of the Massacre Bench (Areas A, B and C) would have problems with wilderness management. Most of these areas are open, rolling terrain dominated by sparse stands of low growing sagebrush. It is common practice for hunters to travel cross country in vehicles to avoid long walks.

Additionally, the penetration of the area recommended for uses other than wilderness by two cherrystem roads would allow vehicles good access to the interior of the unit increasing the probability of cross country travel. The nature of these areas is such that erection of barriers would not be effective as vehicles could easily drive around the barriers. Additionally, if minerals were developed in the northern portion of the WSA, management to retain the existing wilderness values would be extremely difficult in the face of open pit mining, haul roads and processing facilities.

Energy and Mineral Values

The WSA contains portions of one mining district (Lone Pine) with a potential for significant mineral values (Area E). No significant values for oil, gas or any other leasable or saleable minerals have been identified.

Approximately 75 mining claims are located in the Lone Pine Mining District at the northern end of the WSA. The claims were dropped in 1987. Prospecting first occurred in the Lone Pine Mining District in 1897. The Antelope Mine has reportedly produced a small amount of mercury. There is no present activity at the mine. No other mining claims or prospecting activities are known to occur in the WSA.

An analysis of the mineral resource and geothermal potential of adjacent Charles Sheldon Antelope Refuge WSAs was conducted by the U.S. Geological Survey and U.S. Bureau of Mines. Evaluation is based on the interpretation of analyses or rock and stream sediment samples, analyses of spring water samples, geologic mapping and geophysical surveys. In the east edge of the WSA, in the recommended wilderness, geophysical data can be interpreted as a buried caldera or pluton. Rock samples collected by the USGS within the boundaries of the inferred caldera but outside the WSA contain anomalous values of mercury, gold, antimony, arsenic, tungsten, molybdenum, barium, manganese and uranium. The distribution and association of the anomalous elements suggest that this area has a moderate to high potential for concealed deposits (Cathrall <u>et al</u>, 1978). There are no mineral leases in this WSA. The whole WSA is considered by USGS to have very low potential for low and gas. The potential for geothermal resources is rated low.

The U.S. Geological Survey/Bureau of Mines study of the recommended wilderness (USGS Bulletin #1707) found no identified metallic or non-metallic resources. The report identifies a moderate potential for gold, silver and mercury in hydrothermal deposits on the eastern portion of the area recommended for wilderness. There is a moderate potential for uranium on the northern and eastern portions of the WSA. There is no potential for oil and gas in the WSA. There are no known new prospecting activities or claims in the WSA.

Impacts on Resources

Table 4 summarizes the effects on pertinent resources for all the alternatives considered including designation or non-designation of the entire area as wilderness.

	Table 4Comparative Summary of the Impacts by Alternative						
Issue Topics	Proposed Action (Partial Wilderness)	All Wilderness Alternative	Partial Wilderness Alternative "A"	Partial Wilderness Alternative "B"	No Wilderness Alternative		
Wilderness Values	On the 78,825 acres	values within the 101,290 acre WSA would protected and slightly enhanced over existing levels. Illegal ORV use at edges of WSA would slightly reduce opportunities	of wilderness, naturalness, opportunities for solitude and primi- tive and unconfined recreation and the identified special features would be slightly enhanced. On the 17,339 acres of non-wilderness, naturalness would be lost on 1,280 acres. On the remainder of the non-wilderness portion, naturalness and opportunities for solitude and primitive and uncon- fined recreation	n at u ral n ess, opportunities for solitude and primi- tive and unconfined recreation and most of the identified special features would be slightly enhanced. On the 44,893 acres of non- wilderness, natural- ness would be lost on 1,250 acres. On the remainder of the non-wilderness por- tion, naturalness and opportunities	lost on 1,250 acres. On the remainder of the WSA, natural- ness, opportunities for solitude and primitive and uncon- fined recreation and the identified special features		
	All proposed activ- ities would occur. There would be no impacts on livestock grazing and range management.	AUMs of forage would be foregone. This would lead to	ities would occur. There would be no	All proposed activ- ities would occur. There would be no impacts.	ities would occur.		
M f n e r a 1 Røsource Development		potential mineral resources would be foregone throughout the 101,290 acre WSA. This would be a significant impact since development of a mine would be	designated as wil- derness have no known economic potential. The 17,339 acre non- wilderness portion would be open for development. There	known economic potential. The 44,899 acre non- wilderness portion would be open for	development could occur within the entire WSA. There would be no impacts on mineral resource		
Recreational Use	There would be 100 visitor use days of ORV use eliminated in the wilderness portion of the WSA. I m p a c t s or recreational ORV use would be negligible since the use would be absorbed on other public lands.	and 750 visitor use days annually would be foregone. Impacts would be shifted to other	400 visitor days annually. Impacts would be negligible	portion of the WSA receives almost no ORV use. Impacts on	Use would increase to 1000 visitor days of ORV use annually over the long term. There would be no impacts on recreational ORV use.		
Cultural Resources	There would be no impacts on cultural	sional excavations would be foregone. This would be a sig- nificant impact on study and interpre-	sional excavations would be foregone. This would be a sig-	sional excavation would be partially completed. Loss of knowledge on non- excavated sites	vations could occur. There would be no		
Fueìwood Harvest	Juniper areas would be open for harvest. There would be no impacts on fuelwood harvest.	Fuelwood harvest on 100 cords annually would be foregone. This would be a moderate impact to local woodcutters.	be open for harvest.	be open for harvest. There would be no	be open for harvest. There would be no		

Local Social and Economic Considerations

Social and economic factors were not an issue for the Massacre Rim WSA.

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Summary of WSA-Specific Public Comments/Involvement

During the inventory phase numerous comments were received that dealt with resource conflicts. One letter mentioned the need to exclude part of the WSA for a proposed powerline corridor. One letter mentioned that the unit contained special archaeological values that enhance wilderness values. Two letters mentioned the presence of private inholdings as a reason for not making the area wilderness.

The Susanville District Advisory Council (DAC) after reviewing the BLM Wilderness Study/EIS Process, recommended to the District Manager and California State Director that the Technical Review Team Process be used to assist the BLM in preparing the Draft Wilderness EIS. The Technical Review Team (TRT) process was developed by the Modoc/Washoe Experimental Stewardship Committee. It was used as a tool to lesson the chances of polarization of interest groups and provide the Bureau with better quality public input for decision making purposes through a consensus recommendation process.

The Council selected eight member teams, representing the following resources and interests:

- Livestock-Adjacent Landowners
- Wildlife-Agencies-Sportsmen
- Wilderness-Environmental-Dispersed Recreation
- Minerals-Energy-Utilities
- Wild Horses
- Motorized Recreation
- Cultural-Historical-Archaeological
- Bureau of Land Management

The representatives were very knowledgeable and highly respected members of their interest groups. The TRT members toured the WSA, held lengthy discussions spanning many weeks and eventually reached consensus that a partial wilderness recommendation was appropriate for the Massacre Rim WSA. The Team's recommendation was supported by the Stewardship Committee, Susanville District Advisory Council and by BLM and is the recommended action for this WSA.

Key issues raised through public involvement and analyzed by the Technical Review Team and in the EIS were: the quality of the wilderness resource and how much was appropriate to be preserved and managed as wilderness; concern that wilderness would prevent potential mineral development, livestock management activities and motorized recreation access for hunting; concern that wilderness would limit management of wild horse and burro populations; concern that wilderness would preclude study of potential high value archaeological resources on the Massacre Bench.

During the formal public review of the draft EIS a total of 345 comments specifically addressing the WSA were received. Written comments consisted of 333 letters while 12 oral comments were received at three public hearings. Sixty-two commentors supported the proposed recommendation, 276 comments supported more wilderness than the Proposed Action and seven comments supported no wilderness. Those favoring the Proposed Action mentioned the consensus reached by the TRT group and reiterated the wilderness values of the WSA. Both those who commented in favor of no wilderness and more wilderness than the recommendation, mentioned non-specific concerns about wilderness values or resource conflicts.

The USGS indicated that a potential for valuable mineral deposits exist in the recommended wilderness area and the BLM should reconsider its decision for that area. The Nevada Department of Conservation and Natural Resources, the Bureau of Reclamation and the Environmental Protection Agency all commented on the EIS but did not take a position on wilderness designation.

ESTIMATED COSTS OF ACQUISITION OF NON-FEDERAL HOLDINGS WITHIN AREAS RECOMMENDED FOR DESIGNATION								
Legal Description	Total <u>Acreage</u>	Number of <u>Owners</u>	Type of <u>by Es</u> Surface <u>Estate</u>	Ownership <u>state</u> Sub-Surface <u>Estate</u>	Presently Proposed for <u>Acquisition</u>	Preferred Method of <u>Acquisition</u>		ated Costs <u>guisition</u> <u>Processing Costs</u>
Parcels #1 T43N, R22 Section 4 NESW	40	1	Private	Private	No	Purchase	\$5000-\$6000	\$2000
Parcels #2 T43N, R22E Section 5 NESE	40	1	Private	Private	No	Purchase	\$5000-\$6000	\$2000
Parcels #3 T43N, R22E Section 10 NWNW	40	1	Private	Private	No	Purchase	\$5000-\$6000	\$2000

APPENDIX 1

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⁹The estimated costs listed in this Appendix in no way represent a federal appraised value of the lands, but are rough estimates based upon sales of lands with similar characteristics to those included in the WSA. The estimates are for the purpose of establishing a range of potential costs to the government of acquiring non-federal holdings and in no way represents an offer to purchase or exchange at the cost estimates.