KATHY DAVIS (4022)
CHRISTOPHER LACOMBE (13926)
HARRY SOUVALL (4919)
Assistant Attorneys General
MARK SHURTLEFF (4666)
UTAH ATTORNEY GENERAL
5110 State Office Building
Post Office Box 142477
Salt Lake City, UT 84114-2477
kathydavis@utah.gov
clacombe@utah.gov
hsouvall@utah.gov
Telephone: (801) 537-9045

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, NORTHERN DIVISION

BOX ELDER COUNTY, UTAH, a political subdivision, and STATE OF UTAH, Plaintiffs, vs. UNITED STATES OF AMERICA, Defendant.	**AMENDED COMPLAINT TO QUIET TITLE** Case No. 1:12-cv-00105-DB Judge: Honorable Dee Benson

Box Elder County, Utah ("Box Elder County" or "County"), a Utah political subdivision, and the State of Utah ("State") (collectively referred to as "Plaintiffs") as their Amended Complaint against the Defendant, United States of America ("United States"), allege as follows:

INTRODUCTION

This is an action to quiet title to certain described rights-of-way for highways, including the scope thereof, under the grant of Section 8 of the Mining Act of 1866, 14 Stat. 251, 253, later codified as Revised Statutes 2477 and as 43 U.S.C. §932 (repealed October 21, 1976, with savings provisions recognizing validity of rights-of-way already established) (hereinafter "R.S. 2477"). For judicial convenience and ease of reference, the rights-of-way at issue herein have been divided into ten geographic areas, ranging from 5 roads to 49 roads. Each geographic area has been pleaded as a separate cause of action.

JURISDICTION AND VENUE

1. The claims asserted herein arise under the Quiet Title Act ("QTA"). 28 U.S.C. § 2409a (2006).

2. This Court has subject matter jurisdiction under 28 U.S.C. § 2409a (quiet title) and 28 U.S.C. § 1346(f) (quiet title), as this case involves Plaintiffs' claims to ownership of public highway rights-of-way crossing lands of the United States.

3. Plaintiffs claim title to the public highway rights-of-way crossing lands of the United States at issue in this case as joint undivided owners. *See* UTAH CODE ANN. §§ 72-5-302(2) (Supp. 2011) and -103(2)(b) (2004).

4. On or about November 29, 2011, the State filed a Notice of Intention to File Suit to Quiet Title to Certain Rights-of-Way in Box Elder County, Utah, with the Secretary of Interior over the R.S. 2477 rights-of-way that are the subject of this action. A copy of this letter is attached as Exhibit 1. This 2011 Notice of Intent supplemented the State's prior Notice of Intent regarding R.S. 2477 sent in June 2000. A copy of this letter is attached as Exhibit 1A. Thus, the

State has complied with the requirement to provide notice to the head of the federal agency with jurisdiction over the lands in question 180 days prior to filing this action. 28 U.S.C. § 2409a(m).

5. Venue is proper under 28 U.S.C. § 1391(e) inasmuch as the lands at issue are located within the state of Utah.

PARTIES

6. Utah is one of the fifty sovereign states forming the United States of America, having been admitted to the Union on January 4, 1896, on an equal footing with the original states. Executive power for the State is vested in the Governor, who is responsible for seeing that the laws of Utah are faithfully executed. UTAH CONST. art. VII, § 5; UTAH CODE ANN. § 67-1-1 (2008).

7. Box Elder County is a political subdivision of the state of Utah, located in the northwest area of the state, and is authorized to maintain this action. UTAH CODE ANN. § 17-50-302(2) (2009).

8. Pursuant to the Utah Constitution, the State owns all property interests acquired from the United States at or after the time of statehood. UTAH CONST. art. XX. The State and the County are joint owners of R.S. 2477 rights-of-way within Box Elder County, Utah. UTAH CODE ANN. §§ 72-5-302(2) (Supp. 2011) and -103(2)(b) (2004); *id.* §§ 72-3-103(3) (2004) and -105(3). As an undivided joint owner of the public highway rights-of-way claimed herein, the State is duly authorized to maintain this action. *See* UTAH CONST. art. VII, § 1; *see also generally* UTAH CODE ANN.§§ 72-5-103 through -105, and 72-5-302 (Supp. 2011).

9. In this action, Plaintiffs seek to quiet title in those rights-of-way located within Box Elder County, Utah.

10. Defendant United States is the owner of the lands traversed and bordered by the roads and rights-of-way claimed in this action. The United States Department of the Interior (”DOI”) and Bureau of Land Management (“BLM”) are tasked with managing and protecting the Defendant’s interests in the lands traversed and bordered by the roads and rights-of-way claimed in this action.

THE CONGRESSIONAL GRANT OF RIGHTS-OF-WAY FOR PUBLIC HIGHWAYS CROSSING PUBLIC LAND

11. R.S. 2477 provides as follows: “*And be it further enacted*, That the right of way for the construction of highways over public lands, not reserved for public uses, is hereby granted.” Act of July 26, 1866, ch. 262, § 8, 14 Stat. 251, 253, codified at 43 U.S.C. § 932, repealed by Federal Land Policy Management Act of 1976 (FLPMA), Pub.L. No. 94-579 § 706(a), 90 Stat. 2743.

12. R.S. 2477 was an open congressional grant *in praesenti* of public highway rights-of-way for the benefit of miners, ranchers, homesteaders, and all other members of the public who had need to travel across public lands.

13. Acceptance and vesting of R.S. 2477 rights-of-way required no administrative formalities: no entry, no application, no license, no patent, and no deed on the federal side; no formal act of public acceptance on the part of the states or localities in whom the right was vested. *See Southern Utah Wilderness Alliance v. Bureau of Land Mgmt.*, 425 F.3d 735, 741 (10th Cir. 2005) (hereinafter “*SUWA v. BLM*”). R.S. 2477 operated as a standing offer of a right-of-way over the public domain, and the grant may be accepted without formal action by public authorities. *Id.*

LONG-STANDING DEPARTMENT OF INTERIOR INTERPRETATION OF R.S. 2477

14. Prior to its recent adverse actions, the DOI historically recognized and agreed that state law is borrowed so as to govern the acceptance, scope, and regulatory jurisdiction of R.S. 2477 public highways.

15. Over the years, the DOI adopted numerous regulations and policies interpreting the congressional grant of R.S. 2477 rights-of-way. These regulations and policies served to ensure the DOI's compliance with its statutory duty to manage the public lands subject to valid existing rights.

16. As of and following 1939, R.S. 2477 interpretive regulations found at 43 C.F.R. §244.55 (1939) stated:

> [R.S. 2477] becomes effective upon the construction or establishing of highways, in accordance with the State laws, over public lands not reserved for public uses. No application should be filed under said R.S. 2477 as no action on the part of the Federal Government is necessary.

17. As of and following 1963, R.S. 2477 interpretive regulations found at 43 C.F.R. §244.58 (1963) stated:

> Grants of [R.S. 2477 rights-of-way] become effective upon the construction or establishment of highways, in accordance with the State laws, over public lands, not reserved for public uses. No application should be filed under R.S. 2477, as no action on the part of the Government is necessary.

18. As of and following 1974, R.S. 2477 interpretive regulations found at 43 C.F.R. §§ 2822.1-2 & 2822.2-1 (1974) stated:

> No application should be filed under R.S. 2477, as no action on the part of the Government is necessary. … Grants of [R.S. 2477

> rights-of-way] become effective upon the construction or establishment of highways, in accordance with the State laws, over public lands, not reserved for public uses.

19. As of and following 1986, R.S. 2477 interpretive policies stated in the Bureau of Land Management Manual, R.2-229 stated:

> When public funds have been spent on the road it shall be considered a public road. When the history of the road is unknown or questionable, its existence in a condition suitable for public use is evidence that construction sufficient to cause a grant under R.S. 2477 has taken place.

20. As a matter of federal law, R.S. 2477 borrows from State law relating to acceptance (validity) and scope of such rights-of-way. *See SUWA v. BLM*, 425 F.3d 735 (10th Cir. 2005).

21. R.S. 2477 rights-of-way vested by acts of governmental entities or the public evidencing the acceptance of the right-of-way during operation of the grant.

22. R.S. 2477 rights-of-way were accepted by various acts of the local government highway authority or the public, including, but not limited to,(1) designating the road as a general public highway; (2) expending State or County funds to construct or maintain the road for general highway purposes prior to October 21, 1976; and/or (3) continually using the road as a public thoroughfare, as often as the need arose, for a continuous period of 10 years prior to October 21, 1976. *See, e.g.,* UTAH CODE ANN. § 72-5-104 (Supp. 2011).

23. Congressionally granted R.S. 2477 public highway rights-of-way are property interests, sometimes considered a species of easement. As a congressional grant of property for public purposes, the grant includes the right of use and enjoyment, and the implied or actual right to cross public land to access and use the property interest granted.

24. The scope of an R.S. 2477 right-of-way is not restricted to the beaten path of the road, which DOI now characterizes as the "disturbed width." The scope of an R.S. 2477 right-of-way includes the physical features of the right-of-way as accepted and used, and that which is reasonable and necessary to accommodate the exigencies of increasing travel. *See id.* § 72-5-104(3).

25. R.S. 2477 case law, long-standing DOI interpretation, and historical practice establish the scope of the rights-of-way claimed herein to include that which is reasonable and necessary to ensure safe travel and passage of vehicles on a two-lane road according to sound engineering practices that protect the safety of the traveling public, the features of the road, and improvements that prevent undue degradation or impairment of adjacent lands and resources.

26. Such areas along the roadway beyond the actual beaten path as are reasonable and necessary to provide safe travel on the road, including lands on which attendant accoutrements such as drainage ditches and culverts existed as of the date of the reservation of the subject lands adjacent to the road, or are reasonably and necessarily added after that date to accommodate increased travel for pre-existing uses, are part of the reasonable and necessary use of the roadway, and are therefore within the scope of each highway right-of-way. *See Sierra Club v. Hodel,* 848 F.2d 1068, 1083-84(10th Cir. 1988).

27. Applicable law, historical practice, and sound engineering confirm that an R.S. 2477 right-of-way, as distinguished from the disturbed width of the road, includes a minimum width of 66 feet and any features, facilities, cuts, slopes, water bars, drainage runouts, and fill areas necessary to ensure a safe travel surface as reasonable and necessary under the circumstances specific to each road.

28. The congressional grant of public highway rights-of-way embodied by R.S. 2477 operated on unreserved public lands for 110 years until it was repealed on October 21, 1976, by the Federal Land Policy and Management Act of 1976 ("FLPMA"), 43 U.S.C. §1701 *et seq.*

29. In repealing R.S. 2477, Congress preserved vested R.S. 2477 rights-of-way as valid existing rights and expressly directed the United States and its subordinate agencies (including the DOI and the BLM) to manage federal lands subject to these valid existing rights.

30. Section 701(h) of FLPMA provides as follows: "All actions by the Secretary concerned under this Act shall be subject to valid existing rights." *Id.* § 1701, note; *see also id.* § 1769(a) ("Nothing in this subchapter shall have the effect of terminating any right-of-way or right of use heretofore issued, granted or permitted.").

PLAINTIFFS' R.S. 2477 AND PUBLIC HIGHWAY RIGHTS-OF-WAY

31. Plaintiffs' R.S. 2477 and public highway rights-of-way, easements, and rights-of-entry (collectively referred to as "rights-of-way") serve the common good, benefit the public, and implement the congressional intent of facilitating safe and efficient travel across public lands. The R.S. 2477 rights-of-way granted by Congress necessarily include an implied right of access to the rights-of-way so that they may be used as public thoroughfares.

32. Box Elder County classifies its public highways as Class B (maintained)and Class D (lightly maintained) county roads. This classification is a matter of Utah law and is, herein, generally relevant only to the manner of acceptance of the rights-of-way for the roads. *See* UTAH CODE ANN. §§ 72-3-101 through -105 (2004) (explaining Utah's road classification system).

33. At all times relevant herein, Utah law provided that R.S. 2477 rights-of-way could be accepted by various acts of the local government highway authority or by acts of the public, including, but not limited to, (1) designating the road as a general public highway, also known as a Class B county road; *See id.* § 72-3-103 (prior law in accord); *see also id.* § 27-12-22 (1963); (2) expending State or County funds to construct or maintain a road for general highway purposes prior to October 21, 1976; and/or (3) continually using the road as a public thoroughfare, as often as the need arose, for a continuous period of 10 years prior to October 21, 1976, *see id.* § 72-5-104 (Supp. 2011) (stating that a public highway right-of way is "dedicated and abandoned to the use of the public when it has been continuously used as a public thoroughfare for a period of 10 years").

34. The R.S. 2477 rights-of-way for the Class B and D roads claimed herein were initially accepted as public highways by public use for a continuous period of at least 10 years prior to October 21, 1976, or such other date as requisite for the acceptance of a particular road and its right-of-way claimed herein.

35. The R.S. 2477 rights-of-way for the Class B and D roads may also have been accepted by Box Elder County's designation of these roads as county general highways and/or by Box Elder County's expenditure of State and County funds to construct and maintain these roads as public highways prior to October 21, 1976, or such other date as requisite for the acceptance of a particular road and its R.S. 2477 right-of-way claimed herein.

36. Plaintiffs, by and on behalf of the public, accepted and own the R.S. 2477 rights-of-way for the roads described herein.

37. However, Box Elder County is the highway authority with sole jurisdiction and control of all Class B and Class D roads within its borders. UTAH CODE ANN. §§ 72-3-103(4) and -105(4) (2004). Box Elder County has the sole obligation to manage, construct, and maintain its Class B roads to meet general travel standards established by State law. *See id.* §72-3-103(5).

38. Prior to October 21, 1976, or such other date as is requisite for the acceptance of a particular right-of-way, Plaintiffs accepted R.S. 2477 rights-of-way for the roads claimed herein on unreserved public lands.

39. In addition to the public lands of the United States, some of the roads claimed in this action have segments that access and cross land now or formerly owned by the State of Utah and the Utah School and Institutional Trust Land Administration (sometimes collectively referred to as "SITLA").

40. In those instances where the roads and rights-of-way cross lands formerly in SITLA ownership, Plaintiffs' rights-of-way claimed herein were accepted and perfected as valid existing rights-of-way through the facts set forth herein, prior to the United States' ownership of the subject lands. Title of the United States is subject to these valid existing rights as a matter of law. 43 U.S.C. § 1701, note (2006); cf. UTAH CODE ANN. § 53C-4-203(2) (2009) (stating that patents for SITLA lands are "subject to any valid existing easement or public right-of-way"). In each cause of action set forth below, Plaintiffs' claimed rights-of-way include those granted pursuant to R.S. 2477 and established under law as valid existing rights on the land at issue.

41. The course, existence, and location of the rights-of-way and roads that cross private and SITLA land have not been challenged and are not at issue in this action. This action seeks to quiet title to the rights-of-way crossing the lands of the United States.

42. Plaintiffs' vested public highway rights-of-way for the roads claimed herein continue as valid existing rights until formally abandoned by Plaintiffs. *See* UTAH CODE ANN. §§ 72-5-105(1) and -305 (Supp. 2011).

43. Plaintiffs have not abandoned the rights-of-way for any of the roads claimed in this action.

AREA DESCRIPTIONS

44. In order to better organize the rights-of-way included in this amended complaint to fit within Utah's transportation system, the roads have been divided into Ten Areas: (1) Cotton Thomas Area, (2) Emigrant Trail Area, (3) Etna Area,(4) Goose Creek Area, (5) Kelton Area, (6) Lakeside Area, (7) Mud Basin Area, (8) Patterson Pass Area, (9) Rabbit Springs Area, and (10) Tecoma Area (collectively, the "Ten Areas").

45. The roads within each of the Ten Areas are important links in Plaintiffs' transportation system. These roads connect communities and provide access to natural resources, other roads, and areas of scenic, recreational, and historic value.

46. As important links in Plaintiffs' transportation systems, clear title to the rights-of-way that underlie these roads is of the utmost importance to Plaintiffs and the general public.

47. The Cotton Thomas Area is located in central Box Elder County and is shown on Exhibit 2, attached hereto and incorporated herein.

48. The Cotton Thomas Area includes the following roads—listed by Common Road

Name and County Unique Number: (1) Cotton Thomas Road, 8; (2) Cotton Thomas Basin Road, 8.1; (3), Lynn-Alamo Road, 9; (4) Yost Access Road, 10; (5) Yost Flats Road, 10.1; (6) Yost Flats A Road, 10.2; (7) Junction Valley Cedar Hill Road, 2328; (8) Kimball Creek Road, 2425; (9) Middle Kimball Creek Road, 2426; (10) North Kimball Creek Road; 2427; (11) 2301 Road, 2301; (12) 2302 Road, 2302; (13) 2310 Road, 2310; (14) 2321 Road, 2321; (15) 2325 Road, 2325; and (16) Right Hand Fork of Kimball, 2430.

49. The Emigrant Trail Area is located in central Box Elder County and is shown on Exhibit 3, attached hereto and incorporated herein.

50. The Emigrant Trail Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Emigrant Trail Road, 12; (2) Big Pass Connector Road, 142; (3) Big Pass Road, 15; (4) Board Ranch Road, 13; (5) Cedar Hills Road, 101; (6) East Hogup Road, 7; (7) East Red Dome Road, 84; (8) Government Well Road, 124; (9) Hogup Cabin Road, 123; (10) Hogup Loop Road, 125; (11) Middle Pass Road, 17; (12) Middle Road, 129; (13) North End Upper Hogup, 126; (14) North Red Dome Road, 86; (15) North Tower Road, 122; (16) Old Railroad Grade Road, 88; (17) Peplin Pond Road, 118; (18) Red Dome Road, 83; (19) Sheep Camp Road, 128; (20) Southeast Red Dome Road, 87; (21) Terrace Mountain Road, 90; (22) Upper East Hogup Road, 127; (23) Upper North Finger Road, 130; (24) West Hogup Road, 16; (25) Baker Mountain Road, 2208; (26) Coyote Hill Road, 2509; (27) Crocodile Mountain Spur Road, 2511; (28) Dove Creek Hills Road, 2210; (29) East Matlin Mountain Road, 2512; (30) East Red Dome Road, 2513; (31) Flat Road, 2514; (32) Flat Road, 89; (33) Green Rock Canyon Road, 2211; (34) Hogup Bypass Road, 2515; (35) Indian Cave Access Road, 2516; (36) Lower Hogup Finger Road, 2517; (37) Peplin Mountain Road, 2518;

(38) Pugsley Reservoir Road, 2519; (39) Russian Knoll Road, 2214; (40) South Airplane Hill Road, 85; (41) South Coyote Hill Road, 2521; (42) West Loop Pugsley Reservoir Road, 2522; (43) 2202 Road, 2202; (44) 2502 Road, 2502; (45) 2503 Road, 2503; (46) 2504 Road, 2504; (47) 2506 Road, 2506; (48) 2513B Road, 2513B; and (49) 2513C Road, 2513C.

51. The Etna Area is located in west-central Box Elder County and is shown on Exhibit 4, attached hereto and incorporated herein.

52. The Etna Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Etna Road, 2; (2) Deans Pass Road, 30; (3) Etna Reservoir Road, 35; (4) Tanner Ranch Road, 45; (5) Death Creek Road, 47; (6) Beaty Springs Road, 2412; (7) Buckskin Spring Road, 2413; (8) Buckskin Spring 2 Road, 2414; (9) Cook Canyon Road, 2415; (10) Death Valley Road, 2418; (11) Deer Camp Road, 2419; (12) Dry Canyon Road, 2420; (13) Dry Canyon 2 Road, 2421; (14) Tanner Ranch Road, 2436; (15) Upper Buckskin Spring Road, 2438; (16) Upper Dry Canyon Road, 2439; (17) 2405 Road, 2405; and (18) 2406 Road, 2406.

The Goose Creek Area is located in northwest Box Elder County and is shown on Exhibit 5, attached hereto and incorporated herein.

53. The Goose Creek Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Goose Creek Road, 1; (2) Hardister Road, 11; (3) Meadow Butte Road, 28; (4) East Hardesty Road, 2422; (5) East Vipont Road, 2423; (6) Northwest Meadow Creek Road, 2428; (7) Pole Creek Road, 2429; (8) Southeast Hardesty Road, 2433; (9) Southeast Vipont Road, 2434; (10) 2408 Road, 2408; and (11) 2409 Road, 2409.

54. The Kelton Area is located in north central Box Elder County and is shown on Exhibit 6, attached hereto and incorporated herein.

55. The Kelton Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Kelton Road, 104; (2) Locamotive Springs Loop Road, 117; (3) Old Railroad Grade Road, 12.1; (4) Salt Wells Road, 135; (5) West Wildcat Hills Road, 105; (6) Wildcat Mountain Road, 106; (7) Cedar Hill East Road, 2114; (8) Deep Creek Road, 2115; (9) East Wildcat Road, 2104; (10) North Wildcat Road, 2102; (11) Pilot Spring Road, 2101; (12) Railroad Grade to Wildcat Road, 2116; (13) South Wildcat Road, 2108; (14) South Wildcat Road, 2113; (15) Wildcat Road, 2111; (16) 2105 Road, 2105; (17) 2106 Road, 2106; (18) 2107 Road, 2107; (19) 2109 Road, 2109; (20) 2110 Road, 2110; (21) 2112 Road, 2112; and (22) 2119 Road, 2119.

56. The Lakeside Area is located in south-central Box Elder County and is shown on Exhibit 7, attached hereto and incorporated herein.

57. The Lakeside Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Lakeside Road, 19; (2) Railroad to Newfoundland Road, 2805; (3) Railroad to Newfoundland 2 Road, 2806; (4) 2802 Road, 2802; and (5) 2804 Road, 2804.

58. The Mud Basin Area is located in southwest Box Elder County and is shown on Exhibit 8, attached hereto and incorporated herein.

59. The Mud Basin Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Bedke Spring Road, 43; (2) Emigrant Pass Road, 3; (3) Ingham Pass Road, 6; (4) Keg Springs Road, 5; (5) Mud Basin Road, 73; (6) Muddy Ranch

Road, 18; (7) Bypass Road, 2612; (8) Central Warm Springs Hill Road, 2209; (9) Chournos Access Road, 2613; (10) Crystal Mountain Road , 2614; (11) Devils Playground Road, 2615; (12) Ingham Peak Ridge Road, 2617; (13) Mud Basin Road, 2618; (14) Muddy Creek Road, 2212; (15) North Ridge Road, 2619; (16) Prospect Road, 2620; (17) Prospect 1 Road, 2621; (18) Prospect 2 Road, 2622; (19) Red Butte Road, 2623; (20) Red Butte B Road, 2623B; (21) Rocky Road, 2624; (22) Rocky Pass Ridge Road, 2625; (23) Rosebud Spring Road, 2213; (24) Sheep Spring Road, 2215; (25) Sheep Spring B Road, 2215B; (26) South Warm Springs Hill Road, 2217; (27) Southwest Mud Basin Road, 2626; (28) Warm Springs Hill Road, 2218; (29) West Mud Basin Road, 2627; (30) White Clay Road, 2628; (31) 2201 Road, 2201; (32) 2205 Road, 2205; (33) 2207 Road, 2207; (34) 2601 Road, 2601; (35) 2602 Road, 2602; (36) 2603 Road, 2603; (37) 2604 Road, 2604; (38) 2607 Road, 2607; and (39) 2609 Road, 2609.

60. The Patterson Pass Area is located in southwest Box Elder County and is shown on Exhibit 9, attached hereto and incorporated herein.

61. The Patterson Pass Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Patterson Pass Loop Road, 58; (2) Silver Island Road, 68; (3) Crater Island Road, 2716; (4) Tunnel Springs Road, 2722; (5) West Crater Island Road, 2723; (6) 143 Road, 2713; (7) 2701 Road, 2701; (8) 2703 Road, 2703.

62. The Rabbit Springs Area is located in west central Box Elder County and is shown on Exhibit 10, attached hereto and incorporated herein.

63. The Rabbit Springs Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Rabbit Springs Loop Road, 59; (2) Little Pigeon Road, 65; (3) Lucin Airport Road, 62; (4) Owl Spring Road, 60; (5) South Rabbit Springs Road,

61; (6) Pigeon Mountain Road, 2719; (7) West Little Pigeon Road, 2724; and (8) 2711 Road, 2711.

64. The Tecoma Area is located in southwest Box Elder County and is shown on Exhibit 11, attached hereto and incorporated herein.

65. The Tecoma Area consists of the following roads—listed by Common Road Name and County Unique Number: (1) Tecoma Road, 56; (2) Coal Bank Springs Road, 2715; (3) Kilgore Basin Road, 2424; (4) South Tom Cabin Road, 2435; (5) Southwest Winter Cabin Road, 2431; (6) South Winter Cabin Road, 2432; (7) Tom Cabin Road, 2437; (8) Tower Road, 2721; (9) Winter Cabin Road, 2440; (10) 50 Road, 2411; (11) 2402 Road, 2402; (12) 2403 Road, 2403; (13) 2404 Road, 2404; (14) 2705 Road, 2705; and (15) 2708 Road, 2708.

66. The surveyed centerline of the above-named roads in the Ten Areas are displayed, respectively, as Exhibits 13-208, attached hereto and incorporated herein. Each centerline was plotted using NAD83 mapping grade Global Positioning Survey ("GPS") data collected by Plaintiffs. This centerline data has been verified, confirmed by on the ground inspection, referenced to historic aerial photography, and overlaid upon United States Geological Survey ("USGS") topographic maps.

67. The information and documentation relevant to the above Ten Areas was collected by personnel of the State and the County and compiled pursuant to Utah law. *See* UTAH CODE ANN.§§ 72-5-309 and 310.

68. Within each cause of action set forth below, the right-of-way is shown by map, description, and by reference to verified GPS data plotted on maps showing the United States

Public Land Survey System ("PLSS") aliquot parts of each section, township, and range crossed by the right-of-way.

69. The USGS 7.5-and 15-minute quadrangle maps covering Box Elder County evidence the existence, use, and acceptance of the rights-of-way in this action prior to 1976. See Exhibit 12 for detailed map information.

70. As a matter of historical practice within the agencies of the United States, rights-of-way crossing federal lands are granted, recognized, and acknowledged by reference to PLSS aliquot parts. That is, the United States and its agencies grant, recognize, and acknowledge rights-of-way on federal lands by reference to PLSS aliquot parts and not by metes and bounds.

71. With more precision than a PLSS aliquot part description, Plaintiffs have also provided maps and a GPS data description of the location and centerline course of the roads crossing the rights-of-way claimed herein. The precision in these descriptions exceeds that which has been historically recognized by the United States as sufficient to describe and confirm rights-of-way crossing its lands.

72. Notwithstanding the diligent precision and particularity pleaded herein, each and every right-of-way and road claimed herein exists, is to be decided, and is to be established by the course, location, and historical existence of the right-of-way on the ground as has been accepted, used, and enjoyed by, for, and on behalf of the public, including deviations in course recognized by law as being reasonable and necessary.

73. This action seeks to quiet title only to those portions of the rights-of-way and roads claimed herein and described in the GPS data, attached hereto as Exhibits 13-208, crossing public lands under the jurisdiction of the DOI. As stated earlier, the course, existence,

and location of the segments of the rights-of-way and roads crossing private and SITLA lands are not at issue, are not contested, and are not claimed herein.

74. The segments of roads, if any, crossing United States land managed by federal agencies other than BLM and DOI are not at issue in this amended complaint. Plaintiffs, however, do not concede that the segments are not R.S. 2477 rights-of-way and reserve the right to bring a future quiet title action on these segments.

THE CASE OR CONTROVERSY

A. The Case or Controversy over Disputed Title to Roads over R.S. 2477 Rights-of-Way

75. Box Elder County encompasses approximately 6,729 square miles of land. Approximately 34% of the land within the County is federal land.

76. Due to the vast expanse of federal land in Box Elder County, R.S. 2477 provides the sole legal basis for Box Elder County to claim title to many of the rights-of-way that serve as roads and public highways in the county. All such roads that exist over R.S. 2477 rights-of-way and that are at issue in this suit were authorized, established, constructed, or accepted as R.S. 2477 rights-of-way on unreserved lands prior to October 21, 1976, or have vested as public highways, easements, and valid existing rights by law as set forth in the facts below.

77. The roads over R.S. 2477 rights-of-way have long served the common good by providing a safe and efficient transportation system within Box Elder County. Some of the roads over R.S. 2477 rights-of-way in this action predate Utah's statehood in 1896.

78. The roads over R.S. 2477 rights-of-way described in this Amended Complaint connect roads in the County and in adjacent counties and are integral components of the State of Utah and County's transportation systems.

79. The roads over R.S. 2477 rights-of-way have long served the vital function of linking communities, business operations, private land, and SITLA land and were historically established and constructed to facilitate settlement, commerce, and general public access to public lands and communities.

80. The roads over R.S. 2477 rights-of-way claimed herein are important because, in many instances, there are no alternative routes to serve the public's transportation needs.

81. For decades, and in some instances a century, Plaintiffs and the public have benefited from the quiet and peaceful enjoyment of the roads over R.S. 2477 rights-of-way. In 1976, Congress enacted FLPMA, and R.S. 2477 ceased as a means whereby states and counties could acquire new rights-of-way over public lands. Any and all R.S. 2477 rights-of-way and easements then existing were grandfathered and preserved by Congress as valid and existing rights.

82. Accordingly, Congress directed the agencies of the United States to manage federal public lands subject to the valid existing rights of the State of Utah and its counties, including their R.S. 2477 rights-of-way.

83. Historically, the County, federal land managers, ranchers, mineral resource developers, and other members of the public generally cooperated in the construction, maintenance and use of the roads over R.S. 2477 rights-of-way in furtherance of the common good and without specific concern regarding legal ownership.

84. Without any change in FLPMA or other federal law, the DOI and its agencies recently have engaged in efforts to impair or entirely deprive the State of Utah, Box Elder County, and the public of the use of their vested rights to roads over R.S. 2477 rights-of-way. In so doing, DOI has abrogated its duty to manage public lands subject to valid existing rights.

85. DOI's recent actions have sparked numerous lawsuits and conflicts across the West, including this lawsuit.

B. <u>The Quiet Title Act is the Proper Mechanism for Quieting Title to Plaintiffs' Claimed Rights-of Way in this Case</u>

86. Under the Quiet Title Act, 28 U.S.C. § 2409a, the only prerequisite for a party bringing suit against the United States to quiet title in and to land or property interests is that the aggrieved party have a "reasonable awareness" that the United States claims some interest adverse to the claims of that party.

87. Under Article III of the Constitution, an aggrieved party has standing to bring a Quiet Title Act claim if the party suffers adverse economic effects as a result of uncertainty regarding legal ownership of a right-of-way.

88. An adverse economic effect constitutes injury in fact and results from unresolved questions of land ownership.

89. The State of Utah and Box Elder County have suffered and are continuing to suffer economic injury from uncertainty regarding legal ownership of the roads over R.S. 2477 rights-of-way at issue in this case.

90. The confusion regarding the existence, location, scope, and ownership of roads over R.S. 2477 rights-of-way at issue in this case has created dangerous lapses in road

maintenance, uncertainty regarding future road funding, and economic injuries to the State of Utah and Box Elder County which only resolution by the Court can redress.

91. The Quiet Title Act was enacted at the suggestion of then-United States Attorney General, who explained that such suits were necessary for

> a plaintiff whose title to land was continually being subjected to litigation in the law courts. [Such a plaintiff] could bring a suit to quiet title in a court of equity in order to obtain an adjudication on title and relief against further suits. Similarly, one who feared that an outstanding deed or other interest might cause a claim to be presented in the future could maintain a suit to remove a cloud on title.

H.R. REP. NO. 92-1559, at 4 (1972), *reprinted in* 1972 U.S.C.C.A.N. 4547, 4551, 1972 WL 12541, 4.

92. The Attorney General also specifically highlighted the cases in which the QTA is applicable, including "in boundary disputes between the United States and owners of adjacent property. The quieting of title where the plaintiff claims an estate less than a fee simple-- an easement or the title to minerals-- is likewise included in the terms of the proposed statute." *Id.* at 5.

93. Once the federal government has formally asserted a claim to an interest in land in which a state government also claims an interest, a state government is entitled to treat the land as "real property in which the United States claims an interest." Additionally, once the United States claims an interest in land, that claim is sufficient to cloud title and operates as a present cloud on title for as long as the United States retains authority to assert its claim.

94. The United States has taken several actions that constitute their "claim of interest" in the rights-of-way at issue, as explained in detail below. Therefore, a cloud on title exists with

respect to each of the rights-of-way claimed herein and the Quiet Title Act is the proper mechanism for adjudicating and quieting title.

95. A court of equity has jurisdiction both to prevent the casting of a cloud on title to property and to remove an existing cloud.

96. To eliminate a cloud on title arising out of the United States' asserted claim, and to unilaterally destroy jurisdiction of any such a claim, the United States may file a disclaimer under section (e) of the QTA, which provides that

> If the United States disclaims all interest in the real property or interest therein adverse to the plaintiff at any time prior to the actual commencement of the trial, which disclaimer is confirmed by order of the court, the jurisdiction of the district court shall cease unless it has jurisdiction of the civil action or suit on ground other than and independent of the authority conferred by section 1346(f) of this title.

97. On June 15, 2000, the State of Utah sent a Notice of Intent to Sue ("2000 NOI") to the Secretary of the Interior indicating its intent to file suit to quiet title to roads over R.S. 2477 rights-of-way throughout Utah. Along with the NOI, the State included maps depicting the claimed roads in each county.

98. After filing the 2000 NOI, and between 2006 and 2011, the State of Utah recorded all Class B roads in the State, including those in Box Elder County. The recording documents included legal descriptions of the roads, maps, affidavits of historical use, and other identifying information regarding the claimed roads over the R.S. 2477 rights-of-way.

99. The State filed the recording documents with the BLM.

100. In response, the BLM failed and refused to recognize any of the R.S. 2477 rights-of-way in any administrative proceeding or to issue any non-binding determination with respect to any of the roads over R.S. 2477 rights-of-way.

101. In 2011, the State of Utah amended and sent to Secretary Salazar a second set of NOIs ("2011 NOIs")—one NOI for each County that claims roads over R.S. 2477 rights-of-way in the State. The 2011 NOIs provided County-specific, detailed information regarding those roads.

102. The 2011 NOIs also included detailed county maps, legal descriptions of each road, and affidavits of witnesses attesting to the location and use of the R.S. 2477 rights-of-way at issue in Box Elder County.

103. The DOI has failed to file a disclaimer of interest with respect to the 2000 NOI, 2011 NOIs, or the claims of the State of Utah and Box Elder County with respect to the roads over R.S. 2477 rights-of-way at issue herein.

104. Because the DOI has failed to respond to the claims asserted by the State of Utah and Box Elder County, the ownership, existence, scope, and location of the roads over the R.S. 2477 rights-of-way claimed by the State of Utah and Box Elder County remain in dispute.

C. <u>The Specific Case or Controversy Caused by The Department of Interior's Actions Adverse to All of Plaintiffs' Claimed Rights-of-Way in this Case</u>

105. In 1996, Southern Utah Wilderness Alliance ("SUWA") commenced an action initially against BLM and San Juan County, a Utah county, to require BLM to take action against San Juan County to prevent certain grading activities by the County. *See generally SUWA v. BLM*, 425 F.3d 735 (10th Cir. 2005).

106. Kane and Garfield Counties, also counties in the State of Utah, were ultimately added as defendants for grading activities undertaken in those counties.

107. BLM cross-claimed against San Juan, Garfield, and Kane counties for trespass in grading some of the county roads crossing public lands.

108. In doing so, BLM claimed that regardless of any vested R.S. 2477 right-of-way, the counties could not regulate or maintain their roads without prior authorization from the BLM.

109. The district court rejected this argument and held that the existence of an R.S. 2477 right-of-way was key to resolution of the trespass claims. *See id.* at 743.

110. In response, BLM prevailed upon the district court to allow BLM to determine whether, in the first instance, the Counties owned an R.S. 2477 right-of-way for any of the roads graded. *See id.*

111. In 2005, after nine years of litigation, BLM's preemptive claim to the right to determine the existence of the Counties' R.S. 2477 rights-of-way was wholly rejected, as were the legal standards BLM asked the district court to adopt. *See id.* at 757.

112. The Tenth Circuit confirmed that the "holder" of an R.S. 2477 right-of-way may conduct routine road maintenance without prior approval of the BLM. *See id.* at 745.

113. In light of *SUWA v. BLM*, the DOI concluded that the "interim departmental policy on R.S. 2477, issued in 1997, must be revised." March 22, 2006 Memorandum from Secretary of Interior, Departmental Implementation of *Southern Utah Wilderness Alliance v. Bureau of Land Management,* 425 F.3d 735 (10th Cir. 2005); Revocation of January 22, 1997, Interim Policy; Revocation of December 7, 1988 Policy (2006 DOI Memo).

114. In the 2006 DOI Memo, the DOI acknowledged, that

> Although R.S. 2477 was repealed nearly 30 years ago, controversies continue to arise about the existence and scope of the rights-of-way it granted. R.S. 2477 has been subject to inconsistent judicial and administrative interpretations through its history. Because R.S. 2477 did not require that the rights-of-way be recorded or otherwise documented, it is often difficult for Federal land managers, State, local and tribal governments and public land users to know which right-of-way claims are valid, where they are located and how they may be used.

Id. at 2.

115. The 2006 DOI Memo included an "Attachment- Guidelines for Implementation of *SUWA v. BLM* Principles" (DOI Guidelines).

116. The DOI Guidelines, issued pursuant to the authority of the Secretary of the DOI, direct as follows:

> As the *SUWA v. BLM* court noted, ultimately deciding who holds legal title to an interest in real property, including an R.S. 2477 right-of-way, 'is a judicial, not an executive function.' 425 F.3d at 753. Thus if a claimant seeks a definitive, binding determination of its R.S. 2477 rights, it must file a claim under the Quiet Title Act, 28 U.S.C. § 2409a.

Id. at 6.

117. The DOI Guidelines further direct that the BLM should gather information and "decide 'on a preponderance of the evidence standard' if it supports the existence of a right-of-way under State law in effect prior to the repeal of R.S. 2477." *Id.*

118. The DOI Guidelines specify that

> The inclusion of a highway in a State, county or other local road system is strong evidence of acceptance of the federal grant of a right-of-way, as is the expenditure of money for construction or maintenance. In some States, official action may even be determinative. These facts may also be helpful in determining whether the claimed right-of-way was public in nature.

Id. at 9.

119. On March 22, 2006, in connection with the issuance of the 2006 DOI Memo, the DOI drafted and issued its own press release entitled "Interior Department Announces Guidelines to Implement Court Decision on R.S. 2477." ("DOI Press Release").

120. The DOI Press Release stated the following:

> R.S. 2477 granted rights-of-way for public use across federal land prior to 1976, when Congress repealed the law. Congress specified that any valid R.S. 2477 rights-of-way existing at the time of the repeal would continue in effect. **This has resulted in considerable doubt as to whether counties or the federal government own certain roads on federal lands.**

Id. (emphasis added).

121. The DOI Press Release further acknowledged and recognized that, "[i]n *SUWA v. BLM*, the 10th Circuit clarified that only courts could finally determine the ownership issue, but that federal agencies are permitted to develop a process to analyze claims for administrative purposes." *Id.*

122. The DOI Press Release further acknowledged and stated that "where a claimant seeks a binding determination of a claimed right-of-way, the claimant may file a quiet title action. A court would then make a determination." *Id.*

123. The 2006 DOI Memo also terminated a Memorandum of Understanding dated April 9, 2003 between the Department of Interior and the State of Utah regarding an acknowledgement process for R.S. 2477 rights-of-way (the "MOU").

124. According to a DOI Press Release dated April 9, 2003 and prepared by a spokesperson for the DOI, the MOU recognized "the uncertainty about existing rights-of-way

claims on federal land … and [was negotiated to establish] … a process to resolve many of the long-standing disputes over Revised Statute 2477 (R.S. 2477) existing rights-of-way in Utah."

125. The DOI April 9, 2003 Press Release quoted DOI Secretary, Gale Norton, who acknowledged that "[i]t's time to move forward and, by working collaboratively with the state of Utah, we are able to resolve a long-disputed issue that may otherwise have lead [sic] to costly and lengthy litigation."

126. The MOU provided that DOI would implement a "State and County Road Acknowledgment Process" to "acknowledge the existence of certain R.S. 2477 rights-of-way on [BLM] land within the State of Utah," and outlined the process DOI was to use to make such acknowledgments.

127. The MOU implicitly, and the DOI April 9, 2003 Press Release explicitly, recognized that there were continuing controversies regarding the ownership, existence, location, and scope of R.S. 2477 rights-of-way.

128. The MOU recitals included background of the R.S. 2477 disputes and highlighted—as the existence of the ongoing issues and disputes between the State of Utah and the federal government:

a. In a Report to Congress prepared in June of 1993, the Department of the Interior explained that unresolved conflicts over the status of rights-of-way created pursuant to Revised Statute 2477 were creating a continuing cloud on Federal agencies' ability to manage federal lands.

b. On August 7, 2002, a bipartisan group of eight western governors wrote urging the Department of the Interior to "bring finality to R.S. 2477 disputes in a cooperative manner."

c. On July 16, 2002, the National Association of Counties adopted a resolution urging the Department of the Interior to adopt a policy approach to R.S. 2477

rights-of-way that would allow counties to maintain historical rights-of-way across federally managed lands.

d. Disputes involving R.S. 2477 rights-of-way have generated numerous expensive and inconclusive federal court lawsuits that have left numerous questions concerning the ownership status of R.S. 2477 rights-of-way unresolved; and the high cost of this litigation has made it difficult for states and counties to assert their rights and for conservation groups to assert their interests.

e. The Department of the Interior has traditionally approached R.S. 2477 issues by trying to define the precise legal limits of the original statutory grant.

f. Most of the asserted R.S. 2477 rights-of-way that actually have been part of western states inventoried and maintained transportation infrastructure since before the enactment of the Federal Land Policy and Management Act (FLPMA) in 1976 satisfy the statutory requirements of "construction" and "highway" under almost any interpretation of those statutory terms.

g. The State of Utah has many R.S. 2477 claims, and on June 14, 2000, sent to the Secretary of the Interior a Notice of Intention to File Suit under 28 U.S.C.§2409a(m) to quiet the title to those claims.

h. The roads in which the State of Utah and Utah counties assert claims include many roads of continuing importance to rural transportation.

i. Rights-of-way granted under R.S. 2477 are vested property rights that cannot be eliminated or diminished without due process. However, the statutory grant of the rights-of-way did not require the issuance of an identifying record, such as a patent. The resulting uncertainty surrounding the identity and scope of R.S. 2477 rights-of-way has created unnecessary difficulties in federal, state and local transportation and land use planning decisions.

j. The State of Utah and Utah counties have spent considerable time and substantial resources to gather information about road claims and are prepared, if necessary, to litigate those claims.

k. Federal, state and local land managers and environmental advocacy organizations have all demonstrated a desire to put disputes surrounding R.S. 2477 to rest and move toward an approach to land management that emphasizes cooperation.

129. The termination of the MOU in 2003 once again made certain that R.S. 2477 rights-of-way in Utah would remain undetermined and in disputed status. That is, title would remain clouded.

130. With the termination of the MOU and in an attempt to resolve the ongoing dispute, beginning in 2006 and continuing through 2011, the State of Utah sent documentation of recordation to the BLM of each road that had been recorded in county recorder offices throughout Utah. These recorded roads were filed with the BLM on all Class B roads in Box Elder County.

131. The BLM failed to evaluate the recordation documents and refused to recognize any road in Box Elder County as a valid R.S. 2477 right-of-way. The BLM also failed to process any non-binding determinations.

132. On May 26, 2006, as directed by the 2006 DOI Memo, BLM issued IM No. 2006-161. *See Consultation on Proposed Improvements to R.S. 2477 Rights-of-way.*

133. IM No. 2006-161 described the process BLM was to follow when working on roads with "holders" of R.S. 2477 rights-of-way. BLM was to engage in

> consultation with the holder of an R.S. 2477 right-of-way (ROW), when the holder proposes to undertake any construction or improvement (collectively improvement), beyond routine maintenance, on any portion of the ROW crossing lands administered by the BLM.

Id.

134. IM No. 2006-161 did not define a "holder" of an R.S. 2477 right-of-way.

135. IM No. 2006-161 "[e]xpire[d]: 09/30/2007." *Id*.

136. On August 8, 2008, BLM issued IM No. 2008-175 which "clarifies and supplements the information set forth in IM No. 2006-161, and hereby replaces it." *Id.*

137. IM No. 2008-175 defines "holder" as

> (1) a state or political subdivision of a state that holds an R.S. 2477 ROW, as adjudicated by a Federal court, or (2) a state or political subdivision of a state claiming to have an R.S. 2477 ROW that has been recognized by the BLM in an administrative nonbinding determination (NBD).

Id.

138. IM No. 2008-175 states as follows:

> **Policy/Action**: Before the consultation process described in this IM may occur, the validity of an asserted ROW established under R.S. 2477 must have been adjudicated by a Federal court or recognized by the BLM in an NBD. IM No. 2006-159 (dated May 26, 2006), describes the process for the BLM to follow if it chooses to process an NBD on an asserted R.S. 2477 ROW.

Id.

139. IM No. 2008-175 further states that

> [i]f the validity of an asserted R.S. 2477 ROW has not been adjudicated as valid by a Federal court or recognized as valid by the BLM in an NBD, the entity asserting that it is the holder of the ROW may not undertake any improvement on the ROW. When an entity undertakes an improvement without such adjudication or NBD and, thus, has not been found to be a holder, the BLM may deem the action a trespass or take other appropriate action to protect the public lands and resources.

Id.

140. IM No. 2008-175 "[e]xpire[d]: 09/30/2009." *Id.*

141. It is the custom and practice of BLM to continue to act in accordance with the directives of an IM, including IM No. 2008-175, after its stated expiration date until the issuance of a supplement or replacement IM.

142. The DOI continues to act in accordance with the directives states in IM No. 2008-175. On August 8, 2008, BLM also issued IM No. 2008-174 entitled "Road Maintenance Agreements, " which provides that

> . . . under the principles set forth in *SUWA v. BLM*, the holder of an R.S. 2477 that has been adjudicated in Federal Court or recognized by the BLM in an administrative nonbinding determination may undertake routine maintenance on the ROW without first consulting with the BLM regarding such activities.

Id.

143. IM No. 2008-174 "[e]xpire[d]: 9/30/2009." *Id.*

144. The DOI continues to act in accordance with the directives stated in IM No. 2008-174.

145. A Federal Court has not adjudicated either the State of Utah or Box Elder County to be a "holder" of any of the R.S. 2477 rights-of-way claimed by the Plaintiffs herein.

146. The R.S. 2477 rights-of-way claimed by Plaintiffs herein have not been recognized by the BLM in an administrative non-binding determination.

147. IM Nos. 2008-175 and 174 are regulations issued by the BLM and the DOI that prohibit routine maintenance on R.S. 2477 rights-of-way that have not been adjudicated or recognized by the BLM in a nonbinding determination.

148. Because there has been no adjudication or recognition of the R.S. 2477 rights-of-way at issue in this case, neither the State of Utah nor Box Elder County are "holders" as defined

by the BLM and are, therefore, prohibited by the regulations of the BLM from performing routine maintenance on the R.S. 2477 rights-of-way at issue herein.

149. IM No. 2008-175 and 174 contradict the holding of *SUWA v. BLM* and violate the rights of the State of Utah and Box Elder County specifically recognized therein.

150. IM No. 2008-175 also references the BLM "2800 series Manual/Handbook." (The "BLM Manual") which—in its glossary of terms—defines "holder" as "any entity to whom the BLM has issued a ROW grant."

151. Because the State of Utah and Box Elder County are not "holders" as defined by the BLM, they have only two options: (1) fail to maintain the roads over R.S. 2477 rights-of-way, thus creating dangerous driving conditions, or (2) perform routine maintenance at their own risk, subjecting themselves to possible trespass actions by BLM.

152. Additionally, without a determination of their ownership rights or status as "holders," the State of Utah and Box Elder County, are unable to make budgetary and economic determinations regarding those roads that can be routinely maintained.

153. Certain roads become impassable and dangerous without maintenance.

154. The BLM Manual also provides as follows:

> As to grants issued on or before October 21, 1976, under then existing statutory authority, this manual/handbook/IM series applies to the extent that it does not diminish or reduce any rights conferred by the grant or the statute under which they were issued. Where there is a reduction, the grant or enabling statute will apply instead of the manual.

BLM Manual 2801.6.C.

155. The BLM Manual states the general policy of BLM:

G. Prior Authorizations/Existing Uses. Such uses should be serialized and noted to the public land records for informational purposes.

1. Pre-FLPMA. Recognize as an authorized use, any ROW facility constructed on public land on or before October 21, 1976, under the authority of any act repealed as to future authorization by FLPMA. No further authorization is required by the holder for the following:

a. ***

b. A ROW for a public highway constructed on public land under R.S. 2477 (43 U.S.C. 932, repealed 1976).

BLM Manual 2801.8.G.1.b.

156. The BLM Manual further states:

A. Types. The pre-FLPMA ROW laws consist of two types:

1. Discretionary. Those where the Secretary decided whether to issue a ROW, and

2. Ministerial. Those that were granted by the Congressional Act and the Secretary had no more than a ministerial duty. It is this type of pre-FLPMA ROW with which we are most concerned.

B. Regulations. Prior and current regulations shall be utilized to the extent they do not impair the rights of the holder. Regulations involving procedures such as abandonment and termination activities or methods of review of proposed major maintenance or reconstruction generally do not impair rights so long as the BLM acts promptly.

BLM Manual 2809.20, Special Considerations.

157. The BLM Manual further states:

.21 R.S. 2477, Highway ROW. This is an 1866 Act (14 Stat. 253) granting the ROW for the construction of highways over public land not reserved for a public use. No action by the Secretary was involved in the grant, although there have been occasions where

> the Secretary had opened otherwise unavailable land to the operation of R.S. 2477.
>
> ***
>
> 6. Reasonable Regulations [governing ROWs] are those which do not:
>
> a. Impair rights the holder had under the pre-FLPMA law and regulations in effect at the time of the ROW grant, or
>
> b. Increase the holder's liability for past conduct, or
>
> c. Impose new duties to transactions already completed.

BLM Manual 2809.21.A.6, Special Considerations.

158. The BLM Manual further states:

> 1. FLPMA ROW. Because the legally binding determination of whether a R.S.2477 ROW exists is a judicial one, the BLM should encourage and assist claimants to obtain a ROW pursuant to FLPMA or similar authority

BLM Manual 2809.21.B.1, Special Considerations.

159. The actions of BLM and DOI as alleged herein violate the stated policy of the BLM as set forth in the BLM Manual.

160. On February 20, 2009, DOI Acting Director Ron Wenker issued a Memorandum ("Wenker Memo") to all BLM State Directors stating that, "[p]ending further review and direction from the Secretary, the Bureau of Land Management has been directed not to process or review any claims under R.S. 2477, including the use of the disclaimer rule."

161. No notice, explanation, publication, fact finding or opportunity for comment or hearing was given with regard to the policy announced by the Wenker Memo.

162. The Wenker Memo stated that the "interim step" outlined therein was "designed to preserve the status quo and is not a final policy decision on R.S. 2477 Claims." However, since the issuance of the Wenker Memo in February of 2009, the policy stated therein has been followed by the BLM.

163. In accordance with the Wenker Memo, with the exception of a legal action being commenced by the State of Utah or a County of the State of Utah, the federal government has not reviewed or processed any claims under R.S. 2477 since February 2009.

164. DOI's actions also have recently sparked numerous public highway lawsuits across the western states. DOI solicitors and BLM managers have decided that Plaintiffs have no rights, title, or interest in these public highways crossing federal land unless and until Plaintiffs' rights-of-way are adjudicated in court.

165. Box Elder County is the local highway regulatory authority and has the right to manage and regulate its roads, including the right to adopt ordinances regulating all forms of public motor vehicle travel on its roads. *See* UTAH CODE ANN. § 17-50-309 (2009).

166. Box Elder County is the highway authority with jurisdiction of county roads and is statutorily authorized to place numbering signs, markers, and traffic control signs along its roads. *See* UTAH CODE ANN. §§ 41-6a-208(1) and -102(63) (2010). "[I]nstalling, maintaining, repairing and replacing road signs" is statutorily defined "maintenance" within the County's lawful governmental authority. *See* UTAH CODE ANN. § 72-5-301(5)(p) & (s) (2004).

167. DOI officials have admitted that the DOI is regulating the roads at issue in this lawsuit as DOI roads, and that DOI is responsible for the roads until Plaintiffs' title is confirmed.

168. Despite the DOI's claims, it refuses to pay to maintain the roads or clear snow from them.

169. The BLM, in particular, has refused to use its own funds to repair and maintain the roads and has ignored the widespread public safety hazards directly caused by its recent claim to own the rights-of-way over the roads.

170. Plaintiffs are informed and believe that BLM has significantly reduced the number of instances it grades roads each year in the State of Utah and Box Elder County.

171. Plaintiffs are further informed and believe that BLM has significantly reduced the number of road miles graded and maintained by the BLM in the State of Utah and every year since the passage of FLPMA.

172. Since 2005, the DOI has denied that Plaintiffs have any rights, title, or interest to any road crossing federal land unless and until Plaintiffs have first proven their ownership in court, including the roads in this case.

173. Plaintiffs must confirm their title to the roads in this case so that the County can safely maintain these roads as part of its public highway transportation system and regulate and maintain them as county roads.

174. Certain roads have fallen into disrepair without Box Elder County's maintenance; and both the public and BLM employees have complained of safety hazards, precipitous headcutting, washboards, and entire washouts on many of the roads in this case.

175. Upon confirmation of Plaintiffs' title, the County will immediately resume routine maintenance, repair, and management of any relevant roads.

176. After taking the adverse actions complained of herein, the DOI has stated that the door is wide open for Plaintiffs to come to court to prove their claims and establish their rights.

177. In fact, the BLM's State Director recently testified that it is time to have Plaintiffs' rights-of-way decided.

178. In November of 2005, Kane County filed suit against the DOI (and BLM) under the Administrative Procedures Act, 5 U.S.C. § 551 et seq., and challenged the transportation provisions of the Monument Plan as being arbitrary and capricious. *See Kane County v. Kempthorne*, 495 F. Supp. 1143 (D. Utah 2007), *aff'd* 562 F.3d 1077 (10th Cir. 2009) ("Monument lawsuit").

179. Kane County claimed that the DOI could not restrict, manage, or close Kane County's public highways until after DOI first determined that its actions would not impair Kane County's valid existing rights in its R.S. 2477 public highway rights-of-way. *See Id*.

180. In response, the DOI argued that Kane County lacked standing and could not claim any injury in fact relating to any R.S. 2477 right-of-way until after it had first quieted title to each right-of-way.

181. As expressly stated by the DOI, Kane County had nothing more than "unproven" assertions, not vested R.S. 2477 rights-of-way within the Monument. *See id.*

182. The Court agreed and held that as a matter of sequence, Kane County must quiet title to its rights-of-way before it could challenge DOI's road management actions. *See id.*

183. Although the Tenth Circuit vacated the ruling on the ground that plaintiffs lacked standing, the underlying analysis went unaddressed.

184. The ongoing controversy caused by the DOI will be resolved by this Court's order quieting title to the rights-of-way for the roads claimed herein.

185. On or about February 17, 2012, as a result of the above concerns, the State of Utah, through the Public Lands Policy Coordinator, Kathleen Clarke, sent a letter to Juan Palma, the Utah State Director of the BLM.

186. This letter notified the BLM that the State and Counties would begin maintenance and repair on Class B and D roads statewide and that this maintenance would include, as needed, going outside the disturbed width of roads, but within the statutory right-of-way under Utah law of 66 feet for class D roads and 100 feet for class B roads.

187. On March 1, 2012, Larry Jensen, Department of Interior Regional Solicitor, wrote a letter seeking clarification of the State and Counties position on certain aspects of the letter and stating that

> some activities described in the letter— i.e., "widening and straightening of various road segments" and the collection of fill material from outside the disturbed area **but within the right-of-way**"–fall, in my opinion, squarely within the 10th Circuit's definition of "improvement" or "construction," and are the types of activities on which consultation is required before the State and the Counties can proceed. (Emphasis added).

188. In April 2012, Utah State BLM Director Juan Palma delivered a draft of a letter to Utah Public Lands Policy Coordinator Kathleen Clarke in which he stated that the BLM did not concede that Utah could undertake the actions detailed in its letter without prior consultation with the BLM.

189. The DOI's actions have clouded Plaintiffs' title to their R.S. 2477 rights-of-way for the roads claimed herein and constitute claims adverse to Plaintiffs' interests.

190. The DOI's deliberate actions have created legal liability for Box Elder County, clouded Plaintiffs' title to these rights-of-way, impaired Box Elder County's regulatory authority, and placed the traveling public at risk.

191. During the last twelve years, the actions of the United States and its agencies have clouded Plaintiffs' title and created a case or controversy regarding Plaintiffs' rights of ownership, maintenance, and regulation of the public highway rights-of-way claimed herein.

192. The BLM refused to acknowledge Plaintiffs' right, title, and interest in these R.S. 2477 rights-of-way in the Salt Lake RMP, and the BLM directed the State and County to first prove their title in Court before the BLM would reevaluate its travel plan.

193. In response to Box Elder County's claims of ownership of these rights-of-way, the RMP finalized by the BLM covering Box Elder County provides that the RMP does not alter or extinguish any valid R.S. 2477 rights that the County or individuals may have, or their right to assert and protect R.S. 2477 rights, and to challenge in Federal court or other appropriate venue any restrictions that they believe are inconsistent with their rights. *Id*.

194. The BLM has refused to acknowledge any right, title or interest of Box Elder County in the rights-of-way for these roads until this Court quiets title to the rights-of-way.

195. The BLM's actions in implementing and enforcing the Salt Lake RMP's transportation decisions and the subsequent road closures have excluded Box Elder County from the peaceful enjoyment and regulatory authority of each of the roads pleaded herein and clouded title to all roads in the area subject to the Travel Management Plan.

196. Despite the State of Utah and Box Elder County's diligent efforts to work with the BLM to resolve numerous road management needs, the BLM wholly refuses to acknowledge the State and County's right, title, and interest in each of the roads until confirmed by this Court.

197. Furthermore the United States and its agencies' actions have impeded Box Elder County's ability to undertake construction and maintenance on the roads that exist over the rights-of-way claimed herein.

198. Pursuant to the Quiet Title Act, Plaintiffs are entitled to confirm their ownership of the rights-of-way claimed herein to ensure that State and County funds are spent to regulate and maintain Plaintiffs' public highways and to define the relative parties' rights, title, and interest to avoid future trespass actions.

199. Plaintiffs are further entitled to confirm their ownership of the rights-of-way claimed herein to ensure that the United States and its agencies will change their current practices and comply with their statutory obligation to administer federal lands subject to Plaintiffs' valid existing rights.

FIRST CAUSE OF ACTION – QUIET TITLE
COTTON THOMAS AREA

200. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

201. The Cotton Thomas Area is located in north central Box Elder County in the northwestern region of Utah.

202. The Cotton Thomas Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Cotton Thomas Road, 8; (2) Cotton Thomas Basin Road, 8.1; (3), Lynn-Alamo Road, 9; (4) Yost Access Road, 10; (5) Yost Flats Road, 10.1; (6)

Yost Flats A Road, 10.2; (7) Junction Valley Cedar Hill Road, 2328; (8) Kimball Creek Road, 2425; (9) Middle Kimball Creek Road, 2426; (10) North Kimball Creek Road; 2427; (11) 2301 Road, 2301; (12) 2302 Road, 2302; (13) 2310 Road, 2310; (14) 2321 Road, 2321; (15) 2325 Road, 2325; and (16) Right Hand Fork of Kimball, 2430.

203. Each right-of-way claimed in the Cotton Thomas Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

204. All rights-of-way claimed in the Cotton Thomas Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

205. All rights-of-way claimed in the Cotton Thomas Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

206. Prior to October 21, 1976, the State of Utah, Box Elder County, and the public through continuous use accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Cotton Thomas Road, 8

207. The Cotton Thomas Road is designated as county road number 8 and SGID road identification number RD020143 and is more or less 12.27 miles long.

208. Exhibit 13 (attached hereto and incorporated herein) contains certain information pertaining to the Cotton Thomas Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

209. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cotton Thomas Road solely as it crosses United States public land as included and specifically described in Exhibit 13. The Cotton Thomas Road includes the segment of road specifically set forth in Exhibit 13 and as exists on the ground.

Acceptance of the Cotton Thomas Road R.S. 2477 Right-of-way Prior to October 21, 1976.

210. The Cotton Thomas Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

211. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Cotton Thomas Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

212. The Cotton Thomas Road appears on the Cotton Thomas Basin (1959), and Yost (1959) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit12 for more detailed map information.

213. The County confirmed its acceptance of the Cotton Thomas Road by 1975, when

it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cotton Thomas Road using public funds pursuant to the County's governmental right and authority.

214. Witnesses with personal knowledge of the history of the Cotton Thomas Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

215. Currently known reputation in the community is that the Cotton Thomas Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

216. Public motor vehicle use of the Cotton Thomas Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

217. The Cotton Thomas Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

218. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cotton Thomas Road.

219. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cotton Thomas Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cotton Thomas Basin Road, 8.1

220. The Cotton Thomas Basin Road, a Class B road, is designated as county road number 8.1 and SGID road identification number RD020144 and is more or less 3.96 miles long.

221. Exhibit 14 (attached hereto and incorporated herein) contains certain information pertaining to the Cotton Thomas Basin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

222. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cotton Thomas Basin Road solely as it crosses United States public land as included and specifically described in Exhibit 14. The Cotton Thomas Basin Road includes the segment of road specifically set forth in Exhibit 14 and as exists on the ground.

Acceptance of the Cotton Thomas Basin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

223. The Cotton Thomas Basin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

224. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Cotton Thomas Basin Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

225. The Cotton Thomas Basin Road appears on the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. *See* Exhibit12 for more detailed map information.

226. The County confirmed its acceptance of the Cotton Thomas Basin Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cotton Thomas Basin Road using public funds pursuant to the County's governmental right and authority.

227. Witnesses with personal knowledge of the history of the Cotton Thomas Basin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

228. Currently known reputation in the community is that the Cotton Thomas Basin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

229. Public motor vehicle use of the Cotton Thomas Basin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

230. The Cotton Thomas Basin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

231. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cotton Thomas Basin Road.

232. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cotton Thomas Basin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lynn-Alamo Road, 9

233. The Lynn-Alamo Road, a Class B road, is designated as county road number 9 and SGID road identification number RD020155 and is more or less 7.77 miles long.

234. Exhibit 15 (attached hereto and incorporated herein) contains certain information pertaining to the Lynn-Alamo Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

235. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lynn-Alamo Road solely as it crosses United States public land as included and specifically described in Exhibit 15. The Lynn-Alamo Road includes the segment of road specifically set forth in Exhibit 15 and as exists on the ground.

Acceptance of the Lynn-Alamo Road R.S. 2477 Right-of-way Prior to October 21, 1976.

236. The Lynn-Alamo Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

237. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Lynn-Alamo Road as a public highway located on

the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

238. The Lynn-Alamo Road appears on the Yost (1959) 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit12 for more detailed map information.

239. The County confirmed its acceptance of the Lynn-Alamo Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lynn-Alamo Road using public funds pursuant to the County's governmental right and authority.

240. Witnesses with personal knowledge of the history of the Lynn-Alamo Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

241. Currently known reputation in the community is that the Lynn-Alamo Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

242. Public motor vehicle use of the Lynn-Alamo Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

243. The Lynn-Alamo Road traverses a valid and perfected R.S. 2477 public highway

right-of-way as described herein.

244. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lynn-Alamo Road.

245. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lynn-Alamo Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Yost Access Road, 10

246. The Yost Access Road, a Class B road, is designated as county road number 10 and SGID road identification number RD020002 and is more or less 6.84 miles long.

247. Exhibit 16 (attached hereto and incorporated herein) contains certain information pertaining to the Yost Access Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

248. In this action, the State and County seek to quiet title to the public highway right-of-way for the Yost Access Road solely as it crosses United States public land as included and specifically described in Exhibit 16. The Yost Access Road includes the segment of road specifically set forth in Exhibit 16 and as exists on the ground.

Acceptance of the Yost Access Road R.S. 2477 Right-of-way Prior to October 21, 1976.

249. The Yost Access Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

250. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Yost Access Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

251. The Yost Access Road appears on the Yost (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

252. The County confirmed its acceptance of the Yost Access Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Yost Access Road using public funds pursuant to the County's governmental right and authority.

253. Witnesses with personal knowledge of the history of the Yost Access Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

254. Currently known reputation in the community is that the Yost Access Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

255. Public motor vehicle use of the Yost Access Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

256. The Yost Access Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

257. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Yost Access Road.

258. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Yost Access Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Yost Flats Road, 10.1

259. The Yost Flats Road, a Class B road, is designated as county road number 10.1 and SGID road identification number RD020003 and is more or less 2.37 miles long.

260. Exhibit 17 (attached hereto and incorporated herein) contains certain information pertaining to the Yost Flats Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

261. In this action, the State and County seek to quiet title to the public highway right-of-way for the Yost Flats Road solely as it crosses United States public land as included and specifically described in Exhibit 17. The Yost Flats Road includes the segment of road specifically set forth in Exhibit 17 and as exists on the ground.

Acceptance of the Yost Flats Road R.S. 2477 Right-of-way Prior to October 21, 1976.

262. The Yost Flats Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

263. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Yost Flats Road a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

264. The Yost Flats Road appears on the Yost (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

265. The County confirmed its acceptance of the Yost Flats Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Yost Flats Road using public funds pursuant to the County's governmental right and authority.

266. Witnesses with personal knowledge of the history of the Yost Flats Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

267. Currently known reputation in the community is that the Yost Flats Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

268. Public motor vehicle use of the Yost Flats Roads a public thoroughfare traversing

unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

269. The Yost Flats Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

270. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Yost Flats Road.

271. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Yost Flats Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Yost Flats A Road, 10.2

272. The Yost Flats A Road (a/k/a Yost Access Road A), a Class B road, is designated as county road number 10.2 and SGID road identification number RD020004 and is more or less 1.02 miles long.

273. Exhibit 18 (attached hereto and incorporated herein) contains certain information pertaining to the Yost Flats A Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

274. In this action, the State and County seek to quiet title to the public highway right-of-way for the Yost Flats A Road solely as it crosses United States public land as included and

specifically described in Exhibit 18. The Yost Flats A Road includes the segment of road specifically set forth in Exhibit 18 and as exists on the ground.

Acceptance of the Yost Flats A Road R.S. 2477 Right-of-way Prior to October 21, 1976.

275. The Yost Flats A Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

276. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Yost Flats A Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

277. The Yost Flats A Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Yost Flats A Road using public funds pursuant to the County's governmental right and authority.

278. Witnesses with personal knowledge of the history of the Yost Flats A Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

279. Currently known reputation in the community is that the Yost Flats A Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

280. Public motor vehicle use of the Yost Flats A Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

281. The Yost Flats A Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

282. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Yost Flats A Road.

283. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Yost Flats A Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Junction Valley Cedar Hill Road, 2328

The Junction Valley Cedar Hill Road, a Class D road, is designated as county road number 2328 and SGID road identification number RD020211 and is more or less 5.39 miles long.

284. Exhibit 19 (attached hereto and incorporated herein) contains certain information pertaining to the Junction Valley Cedar Hill Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

285. In this action, the State and County seek to quiet title to the public highway right-of-way for the Junction Valley Cedar Hill Road solely as it crosses United States public land as included and specifically described in Exhibit 19. The Junction Valley Cedar Hill Road

includes the segment of road specifically set forth in Exhibit 19 and as exists on the ground.

Acceptance of the Junction Valley Cedar Hill Road R.S. 2477 Right-of-way Prior to October 21, 1976.

286. The Junction Valley Cedar Hill Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

287. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Junction Valley Cedar Hill Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

288. The Junction Valley Cedar Hill Road appears on the Yost (1959) USGS 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

289. The County confirmed its acceptance of the Junction Valley Cedar Hill Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Junction Valley Cedar Hill Road pursuant to the County's governmental right and authority.

290. Witnesses with personal knowledge of the history of the Junction Valley Cedar Hill Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

291. Currently known reputation in the community is that the Junction Valley Cedar

Hill Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

292. Public motor vehicle use of the Junction Valley Cedar Hill Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

293. The Junction Valley Cedar Hill Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

294. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Junction Valley Cedar Hill Road.

295. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Junction Valley Cedar Hill Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Kimball Creek Road, 2425

296. The Kimball Creek Road, a Class D road, is designated as county road number 2425 and SGID road identification number RD020232 and is more or less 12.79 miles long.

297. Exhibit 20 (attached hereto and incorporated herein) contains certain information pertaining to the Kimball Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

298. In this action, the State and County seek to quiet title to the public highway right-of-way for the Kimball Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 20. The Kimball Creek Road includes the segment of road specifically set forth in Exhibit 20 and as exists on the ground.

Acceptance of the Kimball Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

299. The Kimball Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

300. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Kimball Creek Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

301. The Kimball Creek Road appears on the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

302. The County confirmed its acceptance of the Kimball Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Kimball Creek Road pursuant to the County's governmental right and authority.

303. Witnesses with personal knowledge of the history of the Kimball Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

304. Currently known reputation in the community is that the Kimball Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

305. Public motor vehicle use of the Kimball Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

306. The Kimball Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

307. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Kimball Creek.

308. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Kimball Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Middle Kimball Creek Road, 2426

309. The Middle Kimball Creek Road, a Class D road, is designated as county road number 2426 and SGID road identification number RD020233 and is more or less 2.18 miles long.

310. Exhibit 21 (attached hereto and incorporated herein) contains certain information pertaining to the Middle Kimball Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

311. In this action, the State and County seek to quiet title to the public highway right-of-way for the Middle Kimball Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 21. The Middle Kimball Creek Road includes the segment of road specifically set forth in Exhibit 21 and as exists on the ground.

Acceptance of the Middle Kimball Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

312. The Middle Kimball Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

313. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Middle Kimball Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

314. The County confirmed its acceptance of the Middle Kimball Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Middle Kimball Creek Road pursuant to the County's governmental right and authority.

315. Witnesses with personal knowledge of the history of the Middle Kimball Creek

Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

316. Currently known reputation in the community is that the Middle Kimball Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

317. Public motor vehicle use of the Middle Kimball Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

318. The Middle Kimball Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

319. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Middle Kimball Creek.

320. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Middle Kimball Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Kimball Creek Road, 2427

The North Kimball Creek Road, a Class D road, is designated as county road number 2427 and SGID road identification number RD020234 and is more or less 2.24 miles long.

321. Exhibit 22 (attached hereto and incorporated herein) contains certain information pertaining to the North Kimball Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

322. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Kimball Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 22. The North Kimball Creek Road includes the segment of road specifically set forth in Exhibit 22 and as exists on the ground.

Acceptance of the North Kimball Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

323. The North Kimball Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

324. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Middle Kimball Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

325. The North Kimball Creek Road appears on the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

326. The County confirmed its acceptance of the North Kimball Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the North Kimball Creek Road pursuant to the County's governmental right and authority.

327. Witnesses with personal knowledge of the history of the North Kimball Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

328. Currently known reputation in the community is that the North Kimball Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

329. Public motor vehicle use of the North Kimball Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

330. The North Kimball Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

331. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Middle Kimball Creek.

332. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Middle Kimball Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2301 Road, 2301

333. The 2301 Road, a Class D road, is designated as county road number 2301 and SGID road identification number RD020206 and is more or less 1.16 miles long.

334. Exhibit 23 (attached hereto and incorporated herein) contains certain information pertaining to the 2301 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

335. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2301 Road solely as it crosses United States public land as included and specifically described in Exhibit 23. The 2301 Road includes the segment of road specifically set forth in Exhibit 23 and as exists on the ground.

Acceptance of the 2301 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

336. The 2301 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

337. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 2301 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

338. The 2301 Road appears on the Yost (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

339. The County confirmed its acceptance of the 2301 Road by 1975, when it

designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2301 Road pursuant to the County's governmental right and authority.

340. Witnesses with personal knowledge of the history of the 2301 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

341. Currently known reputation in the community is that the 2301 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

342. Public motor vehicle use of the 2301 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

343. The 2301 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

344. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2301 Road.

345. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2301 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this

road.

2302 Road, 2302

346. The 2302 Road, a Class D road, is designated as county road number 2302 and SGID road identification number RD020207 and is more or less 1.56 miles long.

347. Exhibit 24 (attached hereto and incorporated herein) contains certain information pertaining to the 2302 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

348. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2302 Road solely as it crosses United States public land as included and specifically described in Exhibit 24. The 2302 Road includes the segment of road specifically set forth in Exhibit 24 and as exists on the ground.

Acceptance of the 2302 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

349. The 2302 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

350. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 2302 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

351. The 2302 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2302 Road pursuant to the County's

governmental right and authority.

352. Witnesses with personal knowledge of the history of the 2302 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

353. Currently known reputation in the community is that the 2302 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

354. Public motor vehicle use of the 2302 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

355. The 2302 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

356. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2302 Road.

357. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2302 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2310 Road, 2310

358. The 2310 Road, a Class D road, is designated as county road number 2310 and

SGID road identification number RD020208 and is more or less 1.09 miles long.

359. Exhibit 25(attached hereto and incorporated herein) contains certain information pertaining to the 2310 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

360. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2310 Road solely as it crosses United States public land as included and specifically described in Exhibit 25. The 2310 Road includes the segment of road specifically set forth in Exhibit 25and as exists on the ground.

Acceptance of the 2310 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

361. The 2310 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

362. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 2310 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

363. The 2310 Road appears on the Yost (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

364. The County confirmed its acceptance of the 2310 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the 2310 Road pursuant to the County's governmental right and authority.

365. Witnesses with personal knowledge of the history of the 2310 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

366. Currently known reputation in the community is that the 2310 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

367. Public motor vehicle use of the 2310 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

368. The 2310 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

369. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2310 Road.

370. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2310 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2321 Road, 2321

371. The 2321 Road, a Class D road, is designated as county road number 2321 and SGID road identification number RD020209 and is more or less 1.51 miles long.

372. Exhibit 26 (attached hereto and incorporated herein) contains certain information pertaining to the 2321 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

373. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2321 Road solely as it crosses United States public land as included and specifically described in Exhibit 26. The 2321 Road includes the segment of road specifically set forth in Exhibit 26 and as exists on the ground.

Acceptance of the 2321 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

374. The 2321 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

375. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 2321 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

376. The 2321 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2321 Road with public funds pursuant to the County's governmental right and authority.

377. Witnesses with personal knowledge of the history of the 2321 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

378. Currently known reputation in the community is that the 2321 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

379. Public motor vehicle use of the 2321 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

380. The 2321 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

381. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2321 Road.

382. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2321 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2325 Road, 2325

383. The 2325 Road is designated as county road number 2325 and SGID road identification number RD020210 and is more or less 1.74 miles long.

384. Exhibit 27 (attached hereto and incorporated herein) contains certain information pertaining to the 2325 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

385. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2325 Road solely as it crosses United States public land as included and specifically described in Exhibit 27. The 2325 Road includes the segment of road specifically set forth in Exhibit 27 and as exists on the ground.

Acceptance of the 2325 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

386. The 2325 Road, a Class D road, has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

387. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 2325 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

388. The 2325 Road appears on the Cotton Thomas Basin (1959) and Yost (1959) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

389. The County confirmed its acceptance of the 2325 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2325 Road pursuant to the County's governmental right and

authority.

390. Witnesses with personal knowledge of the history of the 2325 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

391. Currently known reputation in the community is that the 2325 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

392. Public motor vehicle use of the 2325 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

393. The 2325 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

394. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2325 Road.

395. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2325 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Right Hand Fork of Kimball Road, 2430

396. The Right Hand Fork of Kimball Road, a Class D road, is designated as county

road number 2430 and SGID road identification number RD020237 and is more or less 2.26 miles long.

397. Exhibit 28 (attached hereto and incorporated herein) contains certain information pertaining to the Right Hand Fork of Kimball Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

398. In this action, the State and County seek to quiet title to the public highway right-of-way for the Right Hand Fork of Kimball Road solely as it crosses United States public land as included and specifically described in Exhibit 28. The Right Hand Fork of Kimball Road includes the segment of road specifically set forth in Exhibit 28 and as exists on the ground.

Acceptance of the Right Hand Fork of Kimball Road R.S. 2477 Right-of-way Prior to October 21, 1976.

399. The Right Hand Fork of Kimball Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

400. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Right Hand Fork of Kimball Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

401. The Right Hand Fork of Kimball Road appears on the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

402. The County confirmed its acceptance of the Right Hand Fork of Kimball Road by

1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Right Hand Fork of Kimball Road pursuant to the County's governmental right and authority.

403. Witnesses with personal knowledge of the history of the Right Hand Fork of Kimball Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

404. Currently known reputation in the community is that the Right Hand Fork of Kimball Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

405. Public motor vehicle use of the Right Hand Fork of Kimball Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

406. The Right Hand Fork of Kimball Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

407. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Right Hand Fork of Kimball Road.

408. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Right Hand Fork of Kimball Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SECOND CAUSE OF ACTION – QUIET TITLE
EMIGRANT TRAIL AREA

409. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

410. The Emigrant Trail Area is located in central Box Elder County.

411. The Emigrant Trail Area includes the following roads—listed by Common Road Name (if applicable) and County Unique Number: (1) Emigrant Trail Road, 12; (2) Big Pass Connector Road, 142; (3) Big Pass Road, 15; (4) Board Ranch Road, 13; (5) Cedar Hills Road, 101; (6) East Hogup Road, 7; (7) East Red Dome Road, 84; (8) Government Well Road, 124; (9) Hogup Cabin Road, 123; (10) Hogup Loop Road, 125; (11) Middle Pass Road, 17; (12) Middle Road, 129; (13) North End Upper Hogup, 126; (14) North Red Dome Road, 86; (15) North Tower Road, 122; (16) Old Railroad Grade Road, 88; (17) Peplin Pond Road, 118; (18) Red Dome Road, 83; (19) Sheep Camp Road, 128; (20) Southeast Red Dome Road, 87; (21) Terrace Mountain Road, 90; (22) Upper East Hogup Road, 127; (23) Upper North Finger Road, 130; (24) West Hogup Road, 16; (25) Baker Mountain Road, 2208; (26) Coyote Hill Road, 2509; (27) Crocodile Mountain Spur Road, 2511; (28) Dove Creek Hills Road, 2210; (29) East Matlin Mountain Road, 2512; (30) East Red Dome Road, 2513; (31) Flat Road, 2514; (32) Flat Road, 89; (33) Green Rock Canyon Road, 2211; (34) Hogup Bypass Road, 2515; (35) Indian Cave Access Road, 2516; (36) Lower Hogup Finger Road, 2517; (37) Peplin Mountain Road, 2518; (38) Pugsley Reservoir Road, 2519; (39) Russian Knoll Road, 2214; (40) South Airplane

Hill Road, 85; (41) South Coyote Hill Road, 2521; (42) West Loop Pugsley Reservoir Road, 2522; (43) 2202 Road, 2202; (44) 2502 Road, 2502; (45) 2503 Road, 2503; (46) 2504 Road, 2504; (47) 2506 Road, 2506; (48) 2513B Road, 2513B; and (49) 2513C Road, 2513C.

412. Each right-of-way claimed in the Emigrant Trail Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

413. All rights-of-way claimed in the Emigrant Trail Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

414. All rights-of-way claimed in the Emigrant Trail Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

415. Prior to October 21, 1976, the State of Utah, Box Elder County, and the public through continuous use accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Emigrant Trail Road, 12

416. The Emigrant Trail Road, a Class B road, is designated as county road number 12 and SGID road identification number RD020026 and is more or less 29.51 miles long.

417. Exhibit 29 (attached hereto and incorporated herein) contains certain information pertaining to the Emigrant Trail Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

418. In this action, the State and County seek to quiet title to the public highway right-of-way for the Emigrant Trail Road solely as it crosses United States public land as included and specifically described in Exhibit 29. The Emigrant Trail Road includes the segment of road specifically set forth in Exhibit 29 and as exists on the ground.

Acceptance of the Emigrant Trail Road R.S. 2477 Right-of-way Prior to October 21, 1976.

419. The Emigrant Trail Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

420. The Emigrant Trail Road appears on the Prohibition Spring (1971), Warm Spring Hills (1971), Runswick Wash (1971), Red Dome (1971),Russian Knoll (1971) Peplin Flats (1969), Crocodile Mtn NE (1969), Emigrant Pass (1971) and Lucin NE (1967) USGS 7.5 minute maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

421. The County confirmed its acceptance of the Emigrant Trail Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Emigrant Trail Road using public funds pursuant to the County's governmental right and authority.

422. Witnesses with personal knowledge of the history of the Emigrant Trail Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

423. Currently known reputation in the community is that the Emigrant Trail Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

424. Public motor vehicle use of the Emigrant Trail Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

425. The Emigrant Trail Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

426. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Emigrant Trail Road.

427. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Emigrant Trail Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Big Pass Connector Road, 142

428. The Big Pass Connector Road, a Class B road, is designated as county road number 142 and SGID road identification number RD020051 and is more or less 2.20 miles long.

429. Exhibit 30 (attached hereto and incorporated herein) contains certain information pertaining to the Big Pass Connector Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

430. In this action, the State and County seek to quiet title to the public highway right-of-way for the Big Pass Connector Road solely as it crosses United States public land as included and specifically described in Exhibit 30. The Big Pass Connector Road includes the segment of road specifically set forth in Exhibit 30 and as exists on the ground.

Acceptance of the Big Pass Connector Road R.S. 2477 Right-of-way Prior to October 21, 1976.

431. The Big Pass Connector Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

432. The County confirmed its acceptance of the Big Pass Connector Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Big Pass Connector Road using public funds pursuant to the County's governmental right and authority.

433. Witnesses with personal knowledge of the history of the Big Pass Connector Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

434. Currently known reputation in the community is that the Big Pass Connector Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

435. Public motor vehicle use of the Big Pass Connector Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

436. The Big Pass Connector Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

437. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Big Pass Connector Road.

438. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Big Pass Connector Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Big Pass Road, 15

439. The Big Pass Road, a Class B road, is designated as county road number 15 and SGID road identification number RD020057 and is more or less 10.40 miles long.

440. Exhibit 31 (attached hereto and incorporated herein) contains certain information pertaining to the Big Pass Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

441. In this action, the State and County seek to quiet title to the public highway right-of-way for the Big Pass Road solely as it crosses United States public land as included and specifically described in Exhibit 31. The Big Pass Road includes the segment of road specifically set forth in Exhibit 31 and as exists on the ground.

Acceptance of the Big Pass Road R.S. 2477 Right-of-way Prior to October 21, 1976.

442. The Big Pass Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

443. The Big Pass Road appears on the Hogup (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

444. The County confirmed its acceptance of the Big Pass Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Big Pass Road using public funds pursuant to the County's governmental right and authority.

445. Witnesses with personal knowledge of the history of the Big Pass Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

446. Currently known reputation in the community is that the Big Pass Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

447. Public motor vehicle use of the Big Pass Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

448. The Big Pass Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

449. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Big Pass Road.

450. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Big Pass Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Board Ranch Road, 13

451. The Board Ranch Road, a Class B road, is designated as county road number 13 and SGID road identification number RD020038 and is more or less 16.44 miles long.

452. Exhibit 32 (attached hereto and incorporated herein) contains certain information pertaining to the Board Ranch Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

453. In this action, the State and County seek to quiet title to the public highway right-of-way for the Board Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 32. The Board Ranch Road includes the segment of road specifically set forth in Exhibit 32 and as exists on the ground.

Acceptance of the Board Ranch Road R.S. 2477 Right-of-way Prior to October 21, 1976.

454. The Board Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

455. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Board Ranch Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

456. The Board Ranch Road appears on the Russian Knoll (1971), Peplin Flats (1969), and Hogup Bar (1969) USGS 7.5 minute maps, and the Park Valley (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

457. The County confirmed its acceptance of the Board Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Board Ranch Road using public funds pursuant to the County's governmental right and authority.

458. Witnesses with personal knowledge of the history of the Board Ranch Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

459. Currently known reputation in the community is that the Board Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

460. Public motor vehicle use of the Board Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

461. The Board Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

462. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Board Ranch Road.

463. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Board Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cedar Hills Road, 101

464. The Cedar Hills Road, a Class B road, is designated as county road number 101 and SGID road identification number RD020006 and is more or less 5.37 miles long.

465. Exhibit 33 (attached hereto and incorporated herein) contains certain information pertaining to the Cedar Hills Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

466. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cedar Hills Road solely as it crosses United States public land as included and specifically described in Exhibit 33. The Cedar Hills Road includes the segment of road specifically set forth in Exhibit 33 and as exists on the ground.

Acceptance of the Cedar Hills Road R.S. 2477 Right-of-way Prior to October 21, 1976.

467. The Cedar Hills Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

468. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Cedar Hills Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

469. The Cedar Hills Road appears on the Park Valley (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

470. The County confirmed its acceptance of the Cedar Hills Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cedar Hills Road using public funds pursuant to the County's

governmental right and authority.

471. Witnesses with personal knowledge of the history of the Cedar Hills Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

472. Currently known reputation in the community is that the Cedar Hills Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

473. Public motor vehicle use of the Cedar Hills Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

474. The Cedar Hills Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

475. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cedar Hills Road.

476. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cedar Hills Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Hogup Road, 7

477. The East Hogup Road, a Class B road, is designated as county road number 7 and SGID road identification number RD020129 and is more or less 40.35 miles long.

478. Exhibit 34 (attached hereto and incorporated herein) contains certain information pertaining to the East Hogup Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

479. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Hogup Road solely as it crosses United States public land as included and specifically described in Exhibit 34. The East Hogup Road includes the segment of road specifically set forth in Exhibit 34 and as exists on the ground.

Acceptance of the East Hogup Road R.S. 2477 Right-of-way Prior to October 21, 1976.

480. The East Hogup Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

481. The East Hogup Road appears on the Peplin Flats (1969), Hogup Bar (1969), Crocodile Mtn SE (1969) and Dolphin Island West (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

482. The County confirmed its acceptance of the East Hogup Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Hogup Road using public funds pursuant to the County's

governmental right and authority.

483. Witnesses with personal knowledge of the history of the East Hogup Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

484. Currently known reputation in the community is that the East Hogup Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

485. Public motor vehicle use of the East Hogup Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

486. The East Hogup Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

487. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Hogup Road.

488. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Hogup Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Red Dome Road, 84

489. The East Red Dome Road, a Class B road, is designated as county road number 84 and SGID road identification number RD020149 and is more or less 1.26 miles long.

490. Exhibit 35 (attached hereto and incorporated herein) contains certain information pertaining to the East Red Dome Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

491. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Red Dome Road solely as it crosses United States public land as included and specifically described in Exhibit 35. The East Red Dome Road includes the segment of road specifically set forth in Exhibit 35 and as exists on the ground.

Acceptance of the East Red Dome Road R.S. 2477 Right-of-way Prior to October 21, 1976.

492. The East Red Dome Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

493. The East Red Dome Road appears on the Red Dome (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

494. The County confirmed its acceptance of the East Red Dome Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Red Dome Road using public funds pursuant to the County's governmental right and authority.

495. Witnesses with personal knowledge of the history of the East Red Dome Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

496. Currently known reputation in the community is that the East Red Dome Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

497. Public motor vehicle use of the East Red Dome Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

498. The East Red Dome Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

499. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Red Dome Road.

500. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Red Dome Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Government Well Road, 124

501. The Government Well Road, a Class B road, is designated as county road number

124 and SGID road identification number RD020032 and is more or less 5.60miles long.

502. Exhibit 36 (attached hereto and incorporated herein) contains certain information pertaining to the Government Well Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

503. In this action, the State and County seek to quiet title to the public highway right-of-way for the Government Well Road solely as it crosses United States public land as included and specifically described in Exhibit 36. The Government Well Road includes the segment of road specifically set forth in Exhibit 36 and as exists on the ground.

Acceptance of the Government Well Road R.S. 2477 Right-of-way Prior to October 21, 1976.

504. The Government Well Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

505. The Government Well Road appears on the Hogup Bar (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

506. The County confirmed its acceptance of the Government Well Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Government Well Road using public funds pursuant to the County's governmental right and authority.

507. Witnesses with personal knowledge of the history of the Government Well Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

508. Currently known reputation in the community is that the Government Well Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

509. Public motor vehicle use of the Government Well Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

510. The Government Well Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

511. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Government Well Road.

512. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Government Well Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hogup Cabin Road, 123

513. The Hogup Cabin Road, a Class B road, is designated as county road number 123 and SGID road identification number RD020031 and is more or less 4.07 miles long.

514. Exhibit 37 (attached hereto and incorporated herein) contains certain information pertaining to the Hogup Cabin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

515. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hogup Cabin Road solely as it crosses United States public land as included and specifically described in Exhibit 37. The Hogup Cabin Road includes the segment of road specifically set forth in Exhibit 37 and as exists on the ground.

Acceptance of the Hogup Cabin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

516. The Hogup Cabin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

517. The Hogup Cabin Road appears on the Hogup Bar (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

518. The County confirmed its acceptance of the Hogup Cabin Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hogup Cabin Road using public funds pursuant to the County's governmental right and authority.

519. Witnesses with personal knowledge of the history of the Hogup Cabin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October

21, 1976.

520. Currently known reputation in the community is that the Hogup Cabin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

521. Public motor vehicle use of the Hogup Cabin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

522. The Hogup Cabin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

523. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hogup Cabin Road.

524. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hogup Cabin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hogup Loop Road, 125

525. The Hogup Loop Road, a Class B road, is designated as county road number 125 and SGID road identification number RD0200033 and is more or less 4.65 miles long.

526. Exhibit 38 (attached hereto and incorporated herein) contains certain information pertaining to the Hogup Loop Road including: a map depicting the road; township, range and

section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

527. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hogup Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 38. The Hogup Loop Road includes the segment of road specifically set forth in Exhibit 38 and as exists on the ground.

Acceptance of the Hogup Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

528. The Hogup Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

529. The Hogup Loop Road appears on the Hogup Bar (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

530. The County confirmed its acceptance of the Hogup Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hogup Loop Road using public funds pursuant to the County's governmental right and authority.

531. Witnesses with personal knowledge of the history of the Hogup Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

532. Currently known reputation in the community is that the Hogup Loop Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

533. Public motor vehicle use of the Hogup Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

534. The Hogup Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

535. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hogup Loop Road.

536. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hogup Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Middle Pass Road, 17

537. The Middle Pass Road, a Class B road, is designated as county road number 17 and SGID road identification number RD020059 and is more or less 16.16 miles long.

538. Exhibit 39 (attached hereto and incorporated herein) contains certain information pertaining to the Middle Pass Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

539. In this action, the State and County seek to quiet title to the public highway right-of-way for the Middle Pass Road solely as it crosses United States public land as included and specifically described in Exhibit 39. The Middle Pass Road includes the segment of road specifically set forth in Exhibit 39 and as exists on the ground.

Acceptance of the Middle Pass Road R.S. 2477 Right-of-way Prior to October 21, 1976.

540. The Middle Pass Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

541. The Middle Pass Road appears on the Hogup Bar (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

542. The County confirmed its acceptance of the Middle Pass Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Middle Pass Road using public funds pursuant to the County's governmental right and authority.

543. Witnesses with personal knowledge of the history of the Middle Pass Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

544. Currently known reputation in the community is that the Middle Pass Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

545. Public motor vehicle use of the Middle Pass Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

546. The Middle Pass Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

547. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Middle Pass Road.

548. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Middle Pass Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Middle Road, 129

549. The Middle Road, a Class B road, is designated as county road number 129 and SGID road identification number RD020037 and is more or less 3.08 miles long.

550. Exhibit 40 (attached hereto and incorporated herein) contains certain information pertaining to the Middle Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

551. In this action, the State and County seek to quiet title to the public highway right-of-way for the Middle Road solely as it crosses United States public land as included and

specifically described in Exhibit 40. The Middle Road includes the segment of road specifically set forth in Exhibit 40 and as exists on the ground.

Acceptance of the Middle Road R.S. 2477 Right-of-way Prior to October 21, 1976.

552. The Middle Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

553. The Middle Road appears on the Dolphin Island West (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

554. The County confirmed its acceptance of the Middle Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Middle Road using public funds pursuant to the County's governmental right and authority.

555. Witnesses with personal knowledge of the history of the Middle Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

556. Currently known reputation in the community is that the Middle Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

557. Public motor vehicle use of the Middle Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public

highway right-of-way underlying this road.

558. The Middle Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

559. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Middle Road.

560. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Middle Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North End Upper Hogup Road, 126

561. The North End Upper Hogup Road, a Class B road, is designated as county road number 126 and SGID road identification number RD020034 and is more or less 5.50 miles long.

562. Exhibit 41 (attached hereto and incorporated herein) contains certain information pertaining to the North End Upper Hogup Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

563. In this action, the State and County seek to quiet title to the public highway right-of-way for the North End Upper Hogup Road solely as it crosses United States public land as included and specifically described in Exhibit 41. The North End Upper Hogup Road includes the segment of road specifically set forth in Exhibit 41 and as exists on the ground.

Acceptance of the North End Upper Hogup Road R.S. 2477 Right-of-way Prior to October 21, 1976.

564. The North End Upper Hogup Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

565. The North End Upper Hogup Road appears on the Hogup Bar (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

566. The County confirmed its acceptance of the North End Upper Hogup Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North End Upper Hogup Road using public funds pursuant to the County's governmental right and authority.

567. Witnesses with personal knowledge of the history of the North End Upper Hogup Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

568. Currently known reputation in the community is that the North End Upper Hogup Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

569. Public motor vehicle use of the North End Upper Hogup Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant

of an R.S. 2477 public highway right-of-way underlying this road.

570. The North End Upper Hogup Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

571. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North End Upper Hogup Road.

572. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North End Upper Hogup Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Red Dome Road, 86

573. The North Red Dome Road, a Class B road, is designated as county road number 86 and SGID road identification number RD020151 and is more or less 3.14 miles long.

574. Exhibit 42 (attached hereto and incorporated herein) contains certain information pertaining to the North Red Dome Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

575. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Red Dome Road solely as it crosses United States public land as included and specifically described in Exhibit 42. The North Red Dome Road includes the segment of road specifically set forth in Exhibit 42 and as exists on the ground.

Acceptance of the North Red Dome Road R.S. 2477 Right-of-way Prior to October 21,

1976.

576. The North Red Dome Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

577. The North Red Dome Road appears on the Red Dome (1971) and Runwick Wash (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

578. The County confirmed its acceptance of the North Red Dome Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Red Dome Road using public funds pursuant to the County's governmental right and authority.

579. Witnesses with personal knowledge of the history of the North Red Dome Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

580. Currently known reputation in the community is that the North Red Dome Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

581. Public motor vehicle use of the North Red Dome Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

582. The North Red Dome Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

583. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Red Dome Road.

584. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Red Dome Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Tower Road, 122

585. The North Tower Road, a Class B road, is designated as county road number 122 and SGID road identification number RD020030 and is more or less 5.17 miles long.

586. Exhibit 43 (attached hereto and incorporated herein) contains certain information pertaining to the North Tower Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

587. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Tower Road solely as it crosses United States public land as included and specifically described in Exhibit 43. The North Tower Road includes the segment of road specifically set forth in Exhibit 43 and as exists on the ground.

Acceptance of the North Tower Road R.S. 2477 Right-of-way Prior to October 21, 1976.

588. The North Tower Road has long served as a public highway providing access to

and across public land. This road serves the public's transportation needs.

589. The North Tower Road appears on the Hogup Bar (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

590. The County confirmed its acceptance of the North Tower Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Tower Road using public funds pursuant to the County's governmental right and authority.

591. Witnesses with personal knowledge of the history of the North Tower Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

592. Currently known reputation in the community is that the North Tower Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

593. Public motor vehicle use of the North Tower Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

594. The North Tower Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

595. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Tower Road.

596. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Tower Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Old Railroad Grade Road, 88

597. The Old Railroad Grade Road, a Class B road, is designated as county road number 88 and SGID road identification number RD020153 and is more or less 27.53 miles long.

598. Exhibit 44 (attached hereto and incorporated herein) contains certain information pertaining to the Old Railroad Grade Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

599. In this action, the State and County seek to quiet title to the public highway right-of-way for the Old Railroad Grade Road solely as it crosses United States public land as included and specifically described in Exhibit 44. The Old Railroad Grade Road includes the segment of road specifically set forth in Exhibit 44 and as exists on the ground.

Acceptance of the Old Railroad Grade Road R.S. 2477 Right-of-way Prior to October 21, 1976.

600. The Old Railroad Grade Road has long served as a public highway providing

access to and across public land. This road serves the public's transportation needs.

601. The Old Railroad Grade Road appears on the Peplin Flats (1969), Hogup Bar (1969), Matlin (1971), Red Dome (1971) and Prohibition Spring (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

602. The County confirmed its acceptance of the Old Railroad Grade Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Old Railroad Grade Road using public funds pursuant to the County's governmental right and authority.

603. Witnesses with personal knowledge of the history of the Old Railroad Grade Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

604. Currently known reputation in the community is that the Old Railroad Grade Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

605. Public motor vehicle use of the Old Railroad Grade Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

606. The Old Railroad Grade Road traverses a valid and perfected R.S. 2477 public

highway right-of-way as described herein.

607. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Old Railroad Grade Road.

608. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Old Railroad Grade Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Peplin Pond Road, 118

609. The Peplin Pond Road, a Class B road, is designated as county road number 118 and SGID road identification number RD020024 and is more or less 2.69 miles long.

610. Exhibit 45 (attached hereto and incorporated herein) contains certain information pertaining to the Peplin Pond Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

611. In this action, the State and County seek to quiet title to the public highway right-of-way for the Peplin Pond Road solely as it crosses United States public land as included and specifically described in Exhibit 45. The Peplin Pond Road includes the segment of road specifically set forth in Exhibit 45 and as exists on the ground.

Acceptance of the Peplin Pond Road R.S. 2477 Right-of-way Prior to October 21, 1976.

612. The Peplin Pond Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

613. The Peplin Pond Road appears on the Peplin Flats (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

614. The County confirmed its acceptance of the Peplin Pond Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Peplin Pond Road using public funds pursuant to the County's governmental right and authority.

615. Witnesses with personal knowledge of the history of the Peplin Pond Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

616. Currently known reputation in the community is that the Peplin Pond Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

617. Public motor vehicle use of the Peplin Pond Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

618. The Peplin Pond Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

619. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Peplin Pond Road.

620. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Peplin Pond Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Red Dome Road, 83

621. The Red Dome Road, a Class B road, is designated as county road number 83 and SGID road identification number RD020148 and is more or less 11.99 miles long.

622. Exhibit 46 (attached hereto and incorporated herein) contains certain information pertaining to the Red Dome Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

623. In this action, the State and County seek to quiet title to the public highway right-of-way for the Red Dome Road solely as it crosses United States public land as included and specifically described in Exhibit 46. The Red Dome Road includes the segment of road specifically set forth in Exhibit 46 and as exists on the ground.

Acceptance of the Red Dome Road R.S. 2477 Right-of-way Prior to October 21, 1976.

624. The Red Dome Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

625. The Red Dome Road appears on the Prohibition Spring (1971), Matlin (1971) and Red Dome (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and

acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

626. The County confirmed its acceptance of the Red Dome Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Red Dome Road using public funds pursuant to the County's governmental right and authority.

627. Witnesses with personal knowledge of the history of the Red Dome Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

628. Currently known reputation in the community is that the Red Dome Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

629. Public motor vehicle use of the Red Dome Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

630. The Red Dome Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

631. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Red Dome Road.

632. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Red Dome Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sheep Camp Road, 128

633. The Sheep Camp Road, a Class B road, is designated as county road number 128 and SGID road identification number RD020036 and is more or less 1.18 miles long.

634. Exhibit 47 (attached hereto and incorporated herein) contains certain information pertaining to the Sheep Camp Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

635. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sheep Camp Road solely as it crosses United States public land as included and specifically described in Exhibit 47. The Sheep Camp Road includes the segment of road specifically set forth in Exhibit 47 and as exists on the ground.

Acceptance of the Sheep Camp Road R.S. 2477 Right-of-way Prior to October 21, 1976.

636. The Sheep Camp Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

637. The Sheep Camp Road appears on the Dolphin Island West (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

638. The County confirmed its acceptance of the Sheep Camp Road by 1975, when it

designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sheep Camp Road using public funds pursuant to the County's governmental right and authority.

639. Witnesses with personal knowledge of the history of the Sheep Camp Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

640. Currently known reputation in the community is that the Sheep Camp Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

641. Public motor vehicle use of the Sheep Camp Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

642. The Sheep Camp Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

643. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sheep Camp Road.

644. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sheep Camp Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Southeast Red Dome Road, 87

645. The Southeast Red Dome Road, a Class B road, is designated as county road number 87 and SGID road identification number RD020152 and is more or less 5.10 miles long.

646. Exhibit 48 (attached hereto and incorporated herein) contains certain information pertaining to the Southeast Red Dome Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

647. In this action, the State and County seek to quiet title to the public highway right-of-way for the Southeast Red Dome Road solely as it crosses United States public land as included and specifically described in Exhibit 48. The Southeast Red Dome Road includes the segment of road specifically set forth in Exhibit 48 and as exists on the ground.

Acceptance of the Southeast Red Dome Road R.S. 2477 Right-of-way Prior to October 21, 1976.

648. The Southeast Red Dome Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

649. The Southeast Red Dome Road appears on the Red Dome (1971) and Matlin (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

650. The County confirmed its acceptance of the Southeast Red Dome Road by 1975, when it designated and accepted the road as a County highway on the County's general

highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Southeast Red Dome Road using public funds pursuant to the County's governmental right and authority.

651. Witnesses with personal knowledge of the history of the Southeast Red Dome Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

652. Currently known reputation in the community is that the Southeast Red Dome Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

653. Public motor vehicle use of the Southeast Red Dome Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

654. The Southeast Red Dome Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

655. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Southeast Red Dome Road.

656. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Southeast Red Dome Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and

enjoyment of this road.

Terrace Mountain Road, 90

657. The Terrace Mountain Road, a Class B road, is designated as county road number 90 and SGID road identification number RD020156 and is more or less 4.51 miles long.

658. Exhibit 49 (attached hereto and incorporated herein) contains certain information pertaining to the Terrace Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

659. In this action, the State and County seek to quiet title to the public highway right-of-way for the Terrace Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 49. The Terrace Mountain Road includes the segment of road specifically set forth in Exhibit 49 and as exists on the ground.

Acceptance of the Terrace Mountain Road R.S. 2477 Right-of-way Prior to October 21, 1976.

660. The Terrace Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

661. The Terrace Mountain Road appears on the Red Dome (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

662. The County confirmed its acceptance of the Terrace Mountain Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the Terrace Mountain Road using public funds pursuant to the County's governmental right and authority.

663. Witnesses with personal knowledge of the history of the Terrace Mountain Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

664. Currently known reputation in the community is that the Terrace Mountain Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

665. Public motor vehicle use of the Terrace Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

666. The Terrace Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

667. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Terrace Mountain Road.

668. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Terrace Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Upper East Hogup Road, 127

669. The Upper East Hogup Road, a Class B road, is designated as county road number 127 and SGID road identification number RD020035 and is more or less 11.68 miles long.

670. Exhibit 50 (attached hereto and incorporated herein) contains certain information pertaining to the Upper East Hogup Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

671. In this action, the State and County seek to quiet title to the public highway right-of-way for the Upper East Hogup Road solely as it crosses United States public land as included and specifically described in Exhibit 50. The Upper East Hogup Road includes the segment of road specifically set forth in Exhibit 50 and as exists on the ground.

Acceptance of the Upper East Hogup Road R.S. 2477 Right-of-way Prior to October 21, 1976.

672. The Upper East Hogup Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

673. The Upper East Hogup Road appears on the Dolphin Island West (1969) and Crocodile Mtn SE (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

674. The County confirmed its acceptance of the Upper East Hogup Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the Upper East Hogup Road using public funds pursuant to the County's governmental right and authority.

675. Witnesses with personal knowledge of the history of the Upper East Hogup Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

676. Currently known reputation in the community is that the Upper East Hogup Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

677. Public motor vehicle use of the Upper East Hogup Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

678. The Upper East Hogup Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

679. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Upper East Hogup Road.

680. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Upper East Hogup Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Upper North Finger Road, 130

681. The Upper North Finger Road, a Class B road, is designated as county road number 130 and SGID road identification number RD020039 and is more or less 5.42 miles long.

682. Exhibit 51 (attached hereto and incorporated herein) contains certain information pertaining to the Upper North Finger Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

683. In this action, the State and County seek to quiet title to the public highway right-of-way for the Upper North Finger Road solely as it crosses United States public land as included and specifically described in Exhibit 51. The Upper North Finger Road includes the segment of road specifically set forth in Exhibit 51 and as exists on the ground.

Acceptance of the Upper North Finger Road R.S. 2477 Right-of-way Prior to October 21, 1976.

684. The Upper North Finger Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

685. The Upper North Finger Road appears on the Dolphin Island West (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

686. The County confirmed its acceptance of the Upper North Finger Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the Upper North Finger Road using public funds pursuant to the County's governmental right and authority.

687. Witnesses with personal knowledge of the history of the Upper North Finger Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

688. Currently known reputation in the community is that the Upper North Finger Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

689. Public motor vehicle use of the Upper North Finger Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

690. The Upper North Finger Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

691. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Upper North Finger Road.

692. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Upper North Finger Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

West Hogup Road, 16

693. The West Hogup Road, a Class B road, is designated as county road number 16 and SGID road identification number RD020058 and is more or less 24.79 miles long.

694. Exhibit 52 (attached hereto and incorporated herein) contains certain information pertaining to the West Hogup Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

695. In this action, the State and County seek to quiet title to the public highway right-of-way for the West Hogup Road solely as it crosses United States public land as included and specifically described in Exhibit 52. The West Hogup Road includes the segment of road specifically set forth in Exhibit 52 and as exists on the ground.

Acceptance of the West Hogup Road R.S. 2477 Right-of-way Prior to October 21, 1976.

696. The West Hogup Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

697. The West Hogup Road appears on the Hogup Bar (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

698. The County confirmed its acceptance of the West Hogup Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the West Hogup Road using public funds pursuant to the County's governmental right and authority.

699. Witnesses with personal knowledge of the history of the West Hogup Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

700. Currently known reputation in the community is that the West Hogup Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

701. Public motor vehicle use of the West Hogup Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

702. The West Hogup Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

703. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the West Hogup Road.

704. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the West Hogup Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Baker Mountain Road, 2208

705. The Baker Mountain Road, a Class D road, is designated as county road number

2208 and SGID road identification number RD020193 and is more or less 9.40 miles long.

706. Exhibit 53 (attached hereto and incorporated herein) contains certain information pertaining to the Baker Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

707. In this action, the State and County seek to quiet title to the public highway right-of-way for the Baker Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 53. The Baker Mountain Road includes the segment of road specifically set forth in Exhibit 53 and as exists on the ground.

Acceptance of the Baker Mountain Road R.S. 2477 Right-of-way Prior to October 21, 1976.

708. The Baker Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

709. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Baker Mountain Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

710. The Baker Mountain Road appears on the Peplin Flats (1969) and Crocodile Mnt NE (1969) USGS 7.5 minute and the Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

711. The County confirmed its acceptance of the Baker Mountain Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Baker Mountain Road pursuant to the County's governmental right and authority.

712. Witnesses with personal knowledge of the history of the Baker Mountain Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

713. Currently known reputation in the community is that the Baker Mountain Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

714. Public motor vehicle use of the Baker Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

715. The Baker Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

716. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Baker Mountain Road.

717. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Baker Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment

of this road.

Coyote Hill Road, 2509

718. The Coyote Hill Road is designated as county road number 2509 and SGID road identification number RD020257 and is more or less 5.61 miles long.

719. Exhibit 54 (attached hereto and incorporated herein) contains certain information pertaining to the Coyote Hill Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

720. In this action, the State and County seek to quiet title to the public highway right-of-way for the Coyote Hill Road solely as it crosses United States public land as included and specifically described in Exhibit 54. The Coyote Hill Road includes the segment of road specifically set forth in Exhibit 54 and as exists on the ground.

Acceptance of the Coyote Hill Road R.S. 2477 Right-of-way Prior to October 21, 1976.

721. The Coyote Hill Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

722. The Coyote Hill Road appears on the Red Dome (1971), Matlin (1971), and Russian Knoll (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

723. The Coyote Hill Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Coyote Hill Road pursuant to the County's

governmental right and authority.

724. Witnesses with personal knowledge of the history of the Coyote Hill Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

725. Currently known reputation in the community is that the Coyote Hill Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

726. Public motor vehicle use of the Coyote Hill Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

727. The Coyote Hill Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

728. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Coyote Hill Road.

729. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Coyote Hill Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Crocodile Mountain Spur Road, 2511

730. The Crocodile Mountain Spur Road, a Class D road, is designated as county road number 2511 and SGID road identification number RD020259 and is more or less 1.62miles long.

731. Exhibit 55 (attached hereto and incorporated herein) contains certain information pertaining to the Crocodile Mountain Spur Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

732. In this action, the State and County seek to quiet title to the public highway right-of-way for the Crocodile Mountain Spur Road solely as it crosses United States public land as included and specifically described in Exhibit 55. The Crocodile Mountain Spur Road includes the segment of road specifically set forth in Exhibit 55 and as exists on the ground.

Acceptance of the Crocodile Mountain Spur Road R.S. 2477 Right-of-way Prior to October 21, 1976.

733. The Crocodile Mountain Spur Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

734. The Crocodile Mountain Spur Road appears on the Peplin Flats (1969) and Crocodile Mtn NE (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

735. The Crocodile Mountain Spur Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477

right-of-way by managing, maintaining, and improving the Crocodile Mountain Spur Road pursuant to the County's governmental right and authority.

736. Witnesses with personal knowledge of the history of the Crocodile Mountain Spur Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

737. Currently known reputation in the community is that the Crocodile Mountain Spur Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

738. Public motor vehicle use of the Crocodile Mountain Spur Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

739. The Crocodile Mountain Spur Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

740. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Crocodile Mountain Spur Road.

741. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Crocodile Mountain Spur Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dove Creek Hills Road, 2210

742. The Dove Creek Hills Road, a Class D road, is designated as county road number 2210 and SGID road identification number RD020195 and is more or less 10.07 miles long.

743. Exhibit 56 (attached hereto and incorporated herein) contains certain information pertaining to the Dove Creek Hills Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

744. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dove Creek Hills Road solely as it crosses United States public land as included and specifically described in Exhibit 56. The Dove Creek Hills Road includes the segment of road specifically set forth in Exhibit 56 and as exists on the ground.

Acceptance of the Dove Creek Hills Road R.S. 2477 Right-of-way Prior to October 21, 1976.

745. The Dove Creek Hills Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

746. The Dove Creek Hills Road appears on the Warm Spring Hills (1971) and Runswick Wash (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

747. The County confirmed its acceptance of the Dove Creek Hills Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the Dove Creek Hills Road pursuant to the County's governmental right and authority.

748. Witnesses with personal knowledge of the history of the Dove Creek Hills Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

749. Currently known reputation in the community is that the Dove Creek Hills Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

750. Public motor vehicle use of the Dove Creek Hills Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

751. The Dove Creek Hills Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

752. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dove Creek Hills Road.

753. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dove Creek Hills Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Matlin Mountain Road, 2512

754. The East Matlin Mountain Road, a Class D road, is designated as county road number 2512 and SGID road identification number RD020260 and is more or less 6.82 miles long.

755. Exhibit 57 (attached hereto and incorporated herein) contains certain information pertaining to the East Matlin Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

756. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Matlin Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 57. The East Matlin Mountain Road includes the segment of road specifically set forth in Exhibit 57 and as exists on the ground.

Acceptance of the East Matlin Mountain Road R.S. 2477 Right-of-way Prior to October 21, 1976.

757. The East Matlin Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

758. The East Matlin Mountain Road appears on the Hogup Bar (1969), Matlin (1971) and Russian Knoll (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

759. The East Matlin Mountain Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477

right-of-way by managing, maintaining, and improving the East Matlin Mountain pursuant to the County's governmental right and authority.

760. Witnesses with personal knowledge of the history of the East Matlin Mountain Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

761. Currently known reputation in the community is that the East Matlin Mountain Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

762. Public motor vehicle use of the East Matlin Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

763. The East Matlin Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

764. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Matlin Mountain Road.

765. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Matlin Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Red Dome Road, 2513

766. The East Red Dome Road, a Class D road, is designated as county road number 2513 and SGID road identification number RD020261 and is more or less 7.62 miles long.

767. Exhibit 58 (attached hereto and incorporated herein) contains certain information pertaining to the East Red Dome Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

768. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Red Dome Road solely as it crosses United States public land as included and specifically described in Exhibit 58. The East Red Dome Road includes the segment of road specifically set forth in Exhibit 58 and as exists on the ground.

Acceptance of the East Red Dome Road R.S. 2477 Right-of-way Prior to October 21, 1976.

769. The East Red Dome Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

770. The East Red Dome Road appears on the Red Dome (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

771. The East Red Dome Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Red Dome Road using public funds pursuant to the County's governmental right and authority.

772. Witnesses with personal knowledge of the history of the East Red Dome Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

773. Currently known reputation in the community is that the East Red Dome Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

774. Public motor vehicle use of the East Red Dome Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

775. The East Red Dome Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

776. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Red Dome Road.

777. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Red Dome Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Flat Road, 2514

778. The Flat Road, a Class D road, is designated as county road number 2514 and SGID road identification number RD020264 and is more or less 4.66 miles long.

779. Exhibit 59 (attached hereto and incorporated herein) contains certain information pertaining to the Flat Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

780. In this action, the State and County seek to quiet title to the public highway right-of-way for the Flat Road solely as it crosses United States public land as included and specifically described in Exhibit 59. The Flat Road includes the segment of road specifically set forth in Exhibit 59 and as exists on the ground.

Acceptance of the Flat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

781. The Flat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

782. The Flat Road appears on the Matlin (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

783. The Flat Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Flat Road pursuant to the County's governmental right and authority.

784. Witnesses with personal knowledge of the history of the Flat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

785. Currently known reputation in the community is that the Flat Road has been open

for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

786. Public motor vehicle use of the Flat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

787. The Flat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

788. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Flat Road.

789. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Flat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Flat Road, 89

790. The Flat Road 2, a Class D road, is designated as county road number 89 and SGID road identification number RD020154 and is more or less 1.93 miles long.

791. Exhibit 60 (attached hereto and incorporated herein) contains certain information pertaining to the Flat Road 2 including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

792. In this action, the State and County seek to quiet title to the public highway right-of-way for the Flat Road 2 solely as it crosses United States public land as included and specifically described in Exhibit 60. The Flat Road 2 includes the segment of road specifically set forth in Exhibit 60 and as exists on the ground.

Acceptance of the Flat Road 2 R.S. 2477 Right-of-way Prior to October 21, 1976.

793. The Flat Road 2 has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

794. The Flat Road 2 appears on the Matlin (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

795. The County confirmed its acceptance of the Flat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Flat Road 2 pursuant to the County's governmental right and authority.

796. Witnesses with personal knowledge of the history of the Flat Road 2 confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

797. Currently known reputation in the community is that the Flat Road 2 has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

798. Public motor vehicle use of the Flat Road 2 as a public thoroughfare traversing

unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

799. The Flat Road 2 traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

800. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Flat Road 2.

801. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Flat Road 2 on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Green Rock Canyon Road, 2211

802. The Green Rock Canyon Road, a Class D road, is designated as county road number 2211 and SGID road identification number RD020196 and is more or less 1.11 miles long.

803. Exhibit 61 (attached hereto and incorporated herein) contains certain information pertaining to the Green Rock Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

804. In this action, the State and County seek to quiet title to the public highway right-of-way for the Green Rock Canyon Road solely as it crosses United States public land as

included and specifically described in Exhibit 61. The Green Rock Canyon Road includes the segment of road specifically set forth in Exhibit 61 and as exists on the ground.

Acceptance of the Green Rock Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

805. The Green Rock Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

806. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Green Rock Canyon Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

807. The Green Rock Canyon Road appears on the Park Valley (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

808. The County confirmed its acceptance of the Green Rock Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Green Rock Canyon Road pursuant to the County's governmental right and authority.

809. Witnesses with personal knowledge of the history of the Green Rock Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

810. Currently known reputation in the community is that the Green Rock Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

811. Public motor vehicle use of the Green Rock Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

812. The Green Rock Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

813. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Green Rock Canyon Road.

814. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Green Rock Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hogup Bypass Road, 2515

815. The Hogup Bypass Road, a Class D road, is designated as county road number 2515 and SGID road identification number RD020265 and is more or less 8.43 miles long.

816. Exhibit 62 (attached hereto and incorporated herein) contains certain information pertaining to the Hogup Bypass Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

817. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hogup Bypass Road solely as it crosses United States public land as included and specifically described in Exhibit 62. The Hogup Bypass Road includes the segment of road specifically set forth in Exhibit 62 and as exists on the ground.

Acceptance of the Hogup Bypass Road R.S. 2477 Right-of-way Prior to October 21, 1976.

818. The Hogup Bypass Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

819. The Hogup Bypass Road appears on the Hogup Ridge North (1969) and Dolphin Island West (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

820. The County confirmed its acceptance of the Hogup Bypass Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hogup Bypass Road pursuant to the County's governmental right and authority.

821. Witnesses with personal knowledge of the history of the Hogup Bypass Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

822. Currently known reputation in the community is that the Hogup Bypass Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

823. Public motor vehicle use of the Hogup Bypass Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

824. The Hogup Bypass Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

825. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hogup Bypass Road.

826. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hogup Bypass Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Indian Cave Access Road, 2516

827. The Indian Cave Access Road, a Class D road, is designated as county road number 2516 and SGID road identification number RD020266 and is more or less 1.05 miles long.

828. Exhibit63 (attached hereto and incorporated herein) contains certain information pertaining to the Indian Cave Access Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list;

and a complete centerline description of the road.

829. In this action, the State and County seek to quiet title to the public highway right-of-way for the Indian Cave Access Road solely as it crosses United States public land as included and specifically described in Exhibit63. The Indian Cave Access Road includes the segment of road specifically set forth in Exhibit63 and as exists on the ground.

Acceptance of the Indian Cave Access Road R.S. 2477 Right-of-way Prior to October 21, 1976.

830. The Indian Cave Access Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

831. The Indian Cave Access Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Indian Cave Access Road using public funds pursuant to the County's governmental right and authority.

832. Witnesses with personal knowledge of the history of the Indian Cave Access Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

833. Currently known reputation in the community is that the Indian Cave Access Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

834. Public motor vehicle use of the Indian Cave Access Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

835. The Indian Cave Access Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

836. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Indian Cave Access Road.

837. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Indian Cave Access Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lower Hogup Finger Road, 2517

838. The Lower Hogup Finger Road, a Class D road, is designated as county road number 2517 and SGID road identification number RD020267 and is more or less 5.40 miles long.

839. Exhibit 64 (attached hereto and incorporated herein) contains certain information pertaining to the Lower Hogup Finger Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

840. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lower Hogup Finger Road solely as it crosses United States public land as included and specifically described in Exhibit 64. The Lower Hogup Finger Road includes the

segment of road specifically set forth in Exhibit 64 and as exists on the ground.

Acceptance of the Lower Hogup Finger Road R.S. 2477 Right-of-way Prior to October 21, 1976.

841. The Lower Hogup Finger Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

842. The Lower Hogup Finger Road appears on the Hogup Ridge North (1969) and Dolphin Island West (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

843. The County confirmed its acceptance of the Lower Hogup Finger Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lower Hogup Finger Road pursuant to the County's governmental right and authority.

844. Witnesses with personal knowledge of the history of the Lower Hogup Finger Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

845. Currently known reputation in the community is that the Lower Hogup Finger Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

846. Public motor vehicle use of the Lower Hogup Finger Road as a public

thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

847. The Lower Hogup Finger Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

848. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lower Hogup Finger Road.

849. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lower Hogup Finger Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Peplin Mountain Road, 2518

850. The Peplin Mountain Road, a Class D road, is designated as county road number 2518 and SGID road identification number RD020268 and is more or less 4.59 miles long.

851. Exhibit 65 (attached hereto and incorporated herein) contains certain information pertaining to the Peplin Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

852. In this action, the State and County seek to quiet title to the public highway right-of-way for the Peplin Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 65. The Peplin Mountain Road includes the segment of

road specifically set forth in Exhibit 65 and as exists on the ground.

Acceptance of the Peplin Mountain Road R.S. 2477 Right-of-way Prior to October 21, 1976.

853. The Peplin Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

854. The Peplin Mountain Road appears on the Peplin Flats (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

855. The County confirmed its acceptance of the Peplin Mountain Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Peplin Mountain Road pursuant to the County's governmental right and authority.

856. Witnesses with personal knowledge of the history of the Peplin Mountain Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

857. Currently known reputation in the community is that the Peplin Mountain Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

858. Public motor vehicle use of the Peplin Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

859. The Peplin Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

860. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Peplin Mountain Road.

861. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Peplin Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pugsley Reservoir Road, 2519

862. The Pugsley Reservoir Road, a Class D road, is designated as county road number 2519 and SGID road identification number RD020269 and is more or less 4.73 miles long.

863. Exhibit 66 (attached hereto and incorporated herein) contains certain information pertaining to the Pugsley Reservoir Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

864. In this action, the State and County seek to quiet title to the public highway right-of-way for the Pugsley Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 66. The Pugsley Reservoir Road includes the segment of road specifically set forth in Exhibit 66 and as exists on the ground.

Acceptance of the Pugsley Reservoir Road R.S. 2477 Right-of-way Prior to October 21, 1976.

865. The Pugsley Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

866. The Pugsley Reservoir Road appears on the Red Dome (1971) and Runswick Wash (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

867. The Pugsley Reservoir Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Pugsley Reservoir Road pursuant to the County's governmental right and authority.

868. Witnesses with personal knowledge of the history of the Pugsley Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

869. Currently known reputation in the community is that the Pugsley Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

870. Public motor vehicle use of the Pugsley Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

871. The Pugsley Reservoir Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

872. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pugsley Reservoir Road.

873. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pugsley Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Russian Knoll Road, 2214

874. The Russian Knoll Road, a Class D road, is designated as county road number 2214 and SGID road identification number RD020199 and is more or less 3.02 miles long.

875. Exhibit 67 (attached hereto and incorporated herein) contains certain information pertaining to the Russian Knoll Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

876. In this action, the State and County seek to quiet title to the public highway right-of-way for the Russian Knoll Road solely as it crosses United States public land as included and specifically described in Exhibit67. The Russian Knoll Road includes the segment of road specifically set forth in Exhibit 67 and as exists on the ground.

Acceptance of the Russian Knoll Road R.S. 2477 Right-of-way Prior to October 21, 1976.

877. The Russian Knoll Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

878. The Russian Knoll Road appears on the Russian Knoll (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

879. The County confirmed its acceptance of the Peplin Mountain Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Russian Knoll Road pursuant to the County's governmental right and authority.

880. Witnesses with personal knowledge of the history of the Russian Knoll Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

881. Currently known reputation in the community is that the Russian Knoll Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

882. Public motor vehicle use of the Russian Knoll Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

883. The Russian Knoll Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

884. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Russian Knoll Road.

885. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Russian Knoll Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Airplane Hill Road, 2520

886. The South Airplane Hill Road, a Class D road, is designated as county road number 85 and SGID road identification number RD020150 and is more or less 4.34 miles long.

887. Exhibit 68 (attached hereto and incorporated herein) contains certain information pertaining to the South Airplane Hill Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

888. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Airplane Hill Road solely as it crosses United States public land as included and specifically described in Exhibit 68. The South Airplane Hill Road includes the segment of road specifically set forth in Exhibit 68 and as exists on the ground.

Acceptance of the South Airplane Hill Road R.S. 2477 Right-of-way Prior to October 21, 1976.

889. The South Airplane Hill Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

890. The South Airplane Hill Road appears on the Red Dome (1971) and Runswick Wash (1971) USGS7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

891. The South Airplane Hill Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Airplane Hill Road pursuant to the County's governmental right and authority.

892. Witnesses with personal knowledge of the history of the South Airplane Hill Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

893. Currently known reputation in the community is that the South Airplane Hill Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

894. Public motor vehicle use of the South Airplane Hill Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

895. The South Airplane Hill Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

896. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Airplane Hill Road.

897. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Airplane Hill Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Coyote Hill Road, 2521

898. The South Coyote Hill Road, a Class D road, is designated as county road number 2521 and SGID road identification number RD020271 and is more or less 3.76 miles long.

899. Exhibit 69 (attached hereto and incorporated herein) contains certain information pertaining to the South Coyote Hill Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

900. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Coyote Hill Road solely as it crosses United States public land as included and specifically described in Exhibit 69. The South Coyote Hill Road includes the segment of road specifically set forth in Exhibit 69 and as exists on the ground.

Acceptance of the South Coyote Hill Road R.S. 2477 Right-of-way Prior to October 21, 1976.

901. The South Coyote Hill Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

902. The South Coyote Hill Road appears on the Matlin (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

903. The South Coyote Hill Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Coyote Hill pursuant to the County's governmental right and authority.

904. Witnesses with personal knowledge of the history of the South Coyote Hill Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

905. Currently known reputation in the community is that the South Coyote Hill Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

906. Public motor vehicle use of the South Coyote Hill Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

907. The South Coyote Hill Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

908. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Coyote Hill Road.

909. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Coyote Hill Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

West Loop Pugsley Reservoir Road, 2522

910. The West Loop Pugsley Reservoir Road, a Class D road, is designated as county road number 2522 and SGID road identification number RD020272 and is more or less 2.57 miles long.

911. Exhibit70 (attached hereto and incorporated herein) contains certain information pertaining to the West Loop Pugsley Reservoir Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

912. In this action, the State and County seek to quiet title to the public highway right-of-way for the West Loop Pugsley Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 70. The West Loop Pugsley Reservoir Road includes the segment of road specifically set forth in Exhibit 70 and as exists on the ground.

Acceptance of the West Loop Pugsley Reservoir Road R.S. 2477 Right-of-way Prior to October 21, 1976.

913. The West Loop Pugsley Reservoir Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

914. The West Loop Pugsley Reservoir Road appears on the Prohibition Spring (1971) and Red Dome (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

915. The West Loop Pugsley Reservoir Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the West Loop Pugsley Reservoir Road pursuant to the County's governmental right and authority.

916. Witnesses with personal knowledge of the history of the West Loop Pugsley Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

917. Currently known reputation in the community is that the West Loop Pugsley Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

918. Public motor vehicle use of the West Loop Pugsley Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant

of an R.S. 2477 public highway right-of-way underlying this road.

919. The West Loop Pugsley Reservoir Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

920. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the West Loop Pugsley Reservoir Road.

921. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the West Loop Pugsley Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2202 Road, 2202

922. The 2202 Road, a Class D road, is designated as county road number 2202 and SGID road identification number RD020187 and is more or less 0.94 miles long.

923. Exhibit 71 (attached hereto and incorporated herein) contains certain information pertaining to the 2202 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

924. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2202 Road solely as it crosses United States public land as included and specifically described in Exhibit 71. The 2202 Road includes the segment of road specifically set forth in Exhibit 71 and as exists on the ground.

Acceptance of the 2202 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

925. The 2202 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

926. The 2202 Road appears on the Peplin Flats (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

927. The County confirmed its acceptance of the 2202 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2202 Road pursuant to the County's governmental right and authority.

928. Witnesses with personal knowledge of the history of the 2202 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

929. Currently known reputation in the community is that the 2202 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

930. Public motor vehicle use of the 2202 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

931. The 2202 Road traverses a valid and perfected R.S. 2477 public highway right-of-

way as described herein.

932. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2202 Road.

933. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2202 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2502 Road, 2502

934. The 2502 Road, a Class D road, is designated as county road number 2502 and SGID road identification number RD020249 and is more or less 1.26 miles long.

935. Exhibit 72 (attached hereto and incorporated herein) contains certain information pertaining to the 2502 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

936. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2502 Road solely as it crosses United States public land as included and specifically described in Exhibit 72. The 2502 Road includes the segment of road specifically set forth in Exhibit 72 and as exists on the ground.

Acceptance of the 2502 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

937. The 2502 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

938. The 2502 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2502 Road using public funds pursuant to the County's governmental right and authority.

939. Witnesses with personal knowledge of the history of the 2502 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

940. Currently known reputation in the community is that the 2502 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

941. Public motor vehicle use of the 2502 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

942. The 2502 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

943. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2502 Road.

944. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2502 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this

road.

2503 Road, 2503

945. The 2503 Road, a Class D road, is designated as county road number 2503 and SGID road identification number RD020252 and is more or less 1.98 miles long.

946. Exhibit 74[1] (attached hereto and incorporated herein) contains certain information pertaining to the 2503 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

947. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2503 Road solely as it crosses United States public land as included and specifically described in Exhibit 74. The 2503 Road includes the segment of road specifically set forth in Exhibit 74 and as exists on the ground.

Acceptance of the 2503 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

948. The 2503 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

949. The 2503 Road appears on the Peplin Flats (1969) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

950. The 2503 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

[1] Exhibit 73 was intentionally omitted.

managing, maintaining, and improving the 2503 Road pursuant to the County's governmental right and authority.

951. Witnesses with personal knowledge of the history of the 2503 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

952. Currently known reputation in the community is that the 2503 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

953. Public motor vehicle use of the 2503 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

954. The 2503 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

955. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2503 Road.

956. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2503 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2504 Road, 2504

957. The 2504 Road, a Class D road, is designated as county road number 2504 and SGID road identification number RD020254 and is more or less 4.92 miles long.

958. Exhibit 75 (attached hereto and incorporated herein) contains certain information pertaining to the 2504 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

959. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2504 Road solely as it crosses United States public land as included and specifically described in Exhibit 75. The 2504 Road includes the segment of road specifically set forth in Exhibit 75 and as exists on the ground.

Acceptance of the 2504 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

960. The 2504 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

961. The 2504 Road appears on the Runswick Wash (1971) and Red Dome (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

962. The 2504 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2504 Road pursuant to the County's governmental right and authority.

963. Witnesses with personal knowledge of the history of the 2504 Road confirm

public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

964. Currently known reputation in the community is that the 2504 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

965. Public motor vehicle use of the 2504 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

966. The 2504 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

967. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2504 Road.

968. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2504 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2506 Road, 2506

969. The 2506 Road, a Class D road, is designated as county road number 2506 and SGID road identification number RD020256 and is more or less 0.95 miles long.

970. Exhibit 76 (attached hereto and incorporated herein) contains certain information

pertaining to the 2506 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

971. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2506 Road solely as it crosses United States public land as included and specifically described in Exhibit 76. The 2506 Road includes the segment of road specifically set forth in Exhibit 76 and as exists on the ground.

Acceptance of the 2506 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

972. The 2506 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

973. The 2506 Road appears on the Peplin Flats (1969) and the Russian Knoll (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

974. The 2506 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2506 Road pursuant to the County's governmental right and authority.

975. Witnesses with personal knowledge of the history of the 2506 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

976. Currently known reputation in the community is that the 2506 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10

years prior to October 21, 1976, and continuing to the present.

977. Public motor vehicle use of the 2506 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

978. The 2506 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

979. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2506 Road.

980. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2506 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2513B Road, 2513B

981. The 2513B Road, a Class D road, is designated as county road number 2513B and SGID road identification number RD020262 and is more or less 0.88 miles long.

982. Exhibit 77 (attached hereto and incorporated herein) contains certain information pertaining to the 2513B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

983. In this action, the State and County seek to quiet title to the public highway right-

of-way for the 2513B Road solely as it crosses United States public land as included and specifically described in Exhibit 77. The 2513B Road includes the segment of road specifically set forth in Exhibit 77 and as exists on the ground.

Acceptance of the 2513B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

984. The 2513B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

985. The 2513B Road appears on the Red Dome (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

986. The 2513B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2513B Road pursuant to the County's governmental right and authority.

987. Witnesses with personal knowledge of the history of the 2513B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

988. Currently known reputation in the community is that the 2513B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

989. Public motor vehicle use of the 2513B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public

highway right-of-way underlying this road.

990. The 2513B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

991. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2513B Road.

992. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2513B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2513C Road, 2513C

993. The 2513C Road, a Class D road, is designated as county road number 2513C and SGID road identification number RD020263 and is more or less 1.32 miles long.

994. Exhibit 78 (attached hereto and incorporated herein) contains certain information pertaining to the 2513C Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

995. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2513C Road solely as it crosses United States public land as included and specifically described in Exhibit 78. The 2513C Road includes the segment of road specifically set forth in Exhibit 78 and as exists on the ground.

Acceptance of the 2513C Road R.S. 2477 Right-of-way Prior to October 21, 1976.

996. The 2513C Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

997. The 2513C Road appears on the Red Dome (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

998. The 2513C Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2513C Road pursuant to the County's governmental right and authority.

999. Witnesses with personal knowledge of the history of the 2513C Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1000. Currently known reputation in the community is that the 2513C Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1001. Public motor vehicle use of the 2513C Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1002. The 2513C Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1003. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2513C Road.

1004. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2513C Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

THIRD CAUSE OF ACTION – QUIET TITLE
ETNA AREA

1005. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1006. The Etna Area is located in western Box Elder County

1007. The Etna Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Etna Road, 2; (2) Deans Pass Road, 30; (3) Etna Reservoir Road, 35; (4) Tanner Ranch Road, 45; (5) Death Creek Road, 47; (6) Beaty Springs Road, 2412; (7) Buckskin Spring Road, 2413; (8) Buckskin Spring 2 Road, 2414; (9) Cook Canyon Road, 2415; (10) Death Valley Road, 2418; (11) Deer Camp Road, 2419; (12) Dry Canyon Road, 2420; (13) Dry Canyon 2 Road, 2421; (14) Tanner Ranch Road, 2436; (15) Upper Buckskin Spring Road, 2438; (16) Upper Dry Canyon Road, 2439; (17) 2405 Road, 2405; and (18) 2406 Road, 2406.

1008. Each right-of-way claimed in the Etna Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in

and through the area, or any other legitimate purpose.

1009. All rights-of-way claimed in the Etna Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

1010. All rights-of-way claimed in the Etna Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

1011. Prior to October 21, 1976, the State of Utah, Box Elder County, and the public through continuous use accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Etna Road, 2

1012. The Etna Road, a Class B road, is designated as county road number 2 and SGID road identification number RD020062 and is more or less 13.51 miles long.

1013. Exhibit 79 (attached hereto and incorporated herein) contains certain information pertaining to the Etna Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1014. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Etna Road solely as it crosses United States public land as included and specifically described in Exhibit 79. The Etna Road includes the segment of road specifically set forth in Exhibit 79 and as exists on the ground.

Acceptance of the Etna Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1015. The Etna Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1016. The Etna Road appears on the Grouse Creek (1971) and Toms Cabin Spring (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1017. The County confirmed its acceptance of the Etna Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Etna Road using public funds pursuant to the County's governmental right and authority.

1018. Witnesses with personal knowledge of the history of the Etna Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1019. Currently known reputation in the community is that the Etna Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1020. Public motor vehicle use of the Etna Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1021. The Etna Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1022. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Etna Road.

1023. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Etna Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Deans Pass Road, 30

1024. The Deans Pass Road, a Class B road, is designated as county road number 30 and SGID road identification number RD020073 and is more or less 16.30 miles long.

1025. Exhibit 80 (attached hereto and incorporated herein) contains certain information pertaining to the Deans Pass Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1026. In this action, the State and County seek to quiet title to the public highway right-of-way for the Deans Pass Road solely as it crosses United States public land as included and specifically described in Exhibit 80. The Deans Pass Road includes the segment of road specifically set forth in Exhibit 80 and as exists on the ground.

Acceptance of the Deans Pass Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1027. The Deans Pass Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1028. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Deans Pass Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1029. The Deans Pass Road appears on the Grouse Creek (1971) USGS 7.5 minute and the Dairy Valley (1961) and Goose Creek (1961) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1030. The County confirmed its acceptance of the Deans Pass Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Deans Pass Road using public funds pursuant to the County's governmental right and authority.

1031. Witnesses with personal knowledge of the history of the Deans Pass Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1032. Currently known reputation in the community is that the Deans Pass Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

1033. Public motor vehicle use of the Deans Pass Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1034. The Deans Pass Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1035. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Deans Pass Road.

1036. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Deans Pass Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Etna Reservoir Road, 35

1037. The Etna Reservoir Road, a Class B road, is designated as county road number 35 and SGID road identification number RD020079 and is more or less 6.86 miles long.

1038. Exhibit 81 (attached hereto and incorporated herein) contains certain information pertaining to the Etna Reservoir Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1039. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Etna Reservoir Road solely as it crosses United States public land as included and specifically described in Exhibit 81. The Etna Reservoir Road includes the segment of road specifically set forth in Exhibit 81 and as exists on the ground.

Acceptance of the Etna Reservoir Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1040. The Etna Reservoir Road, a Class B road, has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1041. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Etna Reservoir Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1042. The Etna Reservoir Road appears on the Grouse Creek (1971) USGS 7.5 minute and the Cotton Thomas Basin (1959) 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1043. The County confirmed its acceptance of the Etna Reservoir Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Etna Reservoir Road using public funds pursuant to the County's governmental right and authority.

1044. Witnesses with personal knowledge of the history of the Etna Reservoir Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

1045. Currently known reputation in the community is that the Etna Reservoir Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1046. Public motor vehicle use of the Etna Reservoir Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1047. The Etna Reservoir Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1048. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Etna Reservoir Road.

1049. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Etna Reservoir Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Tanner Ranch Road, 45

1050. The Tanner Ranch Road, a Class B road, is designated as county road number 45 and SGID road identification number RD020096 and is more or less 4.03 miles long.

1051. Exhibit 82 (attached hereto and incorporated herein) contains certain information pertaining to the Tanner Ranch Road including: a map depicting the road; township, range and

section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1052. In this action, the State and County seek to quiet title to the public highway right-of-way for the Tanner Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 82. The Tanner Ranch Road includes the segment of road specifically set forth in Exhibit 82 and as exists on the ground.

Acceptance of the Tanner Ranch Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1053. The Tanner Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1054. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Tanner Ranch Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1055. The Tanner Ranch Road appears on the Grouse Creek (1971) USGS 7.5 minute and the Dairy Valley (1961) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1056. The County confirmed its acceptance of the Tanner Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Tanner Ranch Road using public funds pursuant to the County's governmental right and authority.

1057. Witnesses with personal knowledge of the history of the Tanner Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1058. Currently known reputation in the community is that the Tanner Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1059. Public motor vehicle use of the Tanner Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1060. The Tanner Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1061. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Tanner Ranch Road.

1062. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Tanner Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Death Creek Road, 47

1063. The Death Creek Road, a Class B road, is designated as county road number 47

and SGID road identification number RD020098 and is more or less 2.49 miles long.

1064. Exhibit 83 (attached hereto and incorporated herein) contains certain information pertaining to the Death Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1065. In this action, the State and County seek to quiet title to the public highway right-of-way for the Death Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 83. The Death Creek Road includes the segment of road specifically set forth in Exhibit 83 and as exists on the ground.

Acceptance of the Death Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1066. The Death Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1067. The Death Creek Road appears on the Grouse Creek (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1068. The County confirmed its acceptance of the Death Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Death Creek Road using public funds pursuant to the County's governmental right and authority.

1069. Witnesses with personal knowledge of the history of the Death Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1070. Currently known reputation in the community is that the Death Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1071. Public motor vehicle use of the Death Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1072. The Death Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1073. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Death Creek Road.

1074. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Death Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Beaty Springs Road, 2412

1075. The Beaty Springs Road, a Class D road, is designated as county road number 2412 and SGID road identification number RD020221and is more or less 0.60 miles long.

1076. Exhibit 84 (attached hereto and incorporated herein) contains certain information

pertaining to the Beaty Springs Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1077. In this action, the State and County seek to quiet title to the public highway right-of-way for the Beaty Springs Road solely as it crosses United States public land as included and specifically described in Exhibit 84. The Beaty Springs Road includes the segment of road specifically set forth in Exhibit 84 and as exists on the ground.

Acceptance of the Beaty Springs Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1078. The Beaty Springs Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1079. The Beaty Springs Road appears on the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1080. The County confirmed its acceptance of the Beaty Springs Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Beaty Springs Road pursuant to the County's governmental right and authority.

1081. Witnesses with personal knowledge of the history of the Beaty Springs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1082. Currently known reputation in the community is that the Beaty Springs Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1083. Public motor vehicle use of the Beaty Springs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1084. The Beaty Springs Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1085. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Beaty Springs Road.

1086. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Beaty Springs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Buckskin Spring Road, 2413

1087. The Buckskin Spring Road, a Class D road, is designated as county road number 2413 and SGID road identification number RD020222 and is more or less 2.80 miles long.

1088. Exhibit 85 (attached hereto and incorporated herein) contains certain information pertaining to the Buckskin Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

1089. In this action, the State and County seek to quiet title to the public highway right-of-way for the Buckskin Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 85. The Buckskin Spring Road includes the segment of road specifically set forth in Exhibit 85 and as exists on the ground.

Acceptance of the Buckskin Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1090. The Buckskin Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1091. The Buckskin Spring Road appears on the Grouse Creek (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1092. The County confirmed its acceptance of the Buckskin Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Buckskin Spring Road pursuant to the County's governmental right and authority.

1093. Witnesses with personal knowledge of the history of the Buckskin Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1094. Currently known reputation in the community is that the Buckskin Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

1095. Public motor vehicle use of the Buckskin Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1096. The Buckskin Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1097. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Buckskin Spring Road.

1098. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Buckskin Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Buckskin Spring 2 Road, 2414

1099. The Buckskin Spring 2 Road, a Class D road, is designated as county road number 2214 and SGID road identification number RD020223 and is more or less 3.25 miles long.

1100. Exhibit 86 (attached hereto and incorporated herein) contains certain information pertaining to the Buckskin Spring 2 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1101. In this action, the State and County seek to quiet title to the public highway right-of-way for the Buckskin Spring 2 Road solely as it crosses United States public land as included and specifically described in Exhibit 86. The Buckskin Spring 2 Road includes the segment of road specifically set forth in Exhibit 86 and as exists on the ground.

Acceptance of the Buckskin Spring 2 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1102. The Buckskin Spring 2 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1103. The Buckskin Spring 2 Road appears on the Grouse Creek (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1104. The County confirmed its acceptance of the Buckskin Spring 2 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Buckskin Springs 2 Road pursuant to the County's governmental right and authority.

1105. Witnesses with personal knowledge of the history of the Buckskin Spring 2 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1106. Currently known reputation in the community is that the Buckskin Spring 2 Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

1107. Public motor vehicle use of the Buckskin Spring 2 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1108. The Buckskin Spring 2 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1109. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Buckskin Spring 2 Road.

1110. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Buckskin Spring 2 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cook Canyon Road, 2415

1111. The Cook Canyon Road, a Class D road, is designated as county road number 2415 and SGID road identification number RD020224 and is more or less 5.33 miles long.

1112. Exhibit 87 (attached hereto and incorporated herein) contains certain information pertaining to the Cook Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1113. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Cook Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 87. The Cook Canyon Road includes the segment of road specifically set forth in Exhibit 87 and as exists on the ground.

Acceptance of the Cook Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1114. The Cook Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1115. The Cook Canyon Road appears on the Ingham Canyon (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1116. The County confirmed its acceptance of the Cook Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cook Canyon Road pursuant to the County's governmental right and authority.

1117. Witnesses with personal knowledge of the history of the Cook Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1118. Currently known reputation in the community is that the Cook Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1119. Public motor vehicle use of the Cook Canyon Road as a public thoroughfare

traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1120. The Cook Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1121. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Cook Canyon Road.

1122. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cook Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Death Valley Road, 2418

1123. The Death Valley Road, a Class D road, is designated as county road number 2418 and SGID road identification number RD020225 and is more or less 4.39 miles long.

1124. Exhibit 88 (attached hereto and incorporated herein) contains certain information pertaining to the Death Valley Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1125. In this action, the State and County seek to quiet title to the public highway right-of-way for the Death Valley Road solely as it crosses United States public land as included and specifically described in Exhibit 88. The Death Valley Road includes the segment of road

specifically set forth in Exhibit 88 and as exists on the ground.

Acceptance of the Death Valley Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1126. The Death Valley Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1127. The Death Valley Road appears on the Grouse Creek (1971) and Toms Cabin Spring (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1128. The County confirmed its acceptance of the Death Valley Hill Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Death Valley Road pursuant to the County's governmental right and authority.

1129. Witnesses with personal knowledge of the history of the Death Valley Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1130. Currently known reputation in the community is that the Death Valley Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1131. Public motor vehicle use of the Death Valley Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1132. The Death Valley Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1133. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Death Valley Road.

1134. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Death Valley Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Deer Camp Road, 2419

1135. The Deer Camp Road, a Class D road, is designated as county road number 2419 and SGID road identification number RD020226 and is more or less 2.74 miles long.

1136. Exhibit 89 (attached hereto and incorporated herein) contains certain information pertaining to the Deer Camp Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1137. In this action, the State and County seek to quiet title to the public highway right-of-way for the Deer Camp Road solely as it crosses United States public land as included and specifically described in Exhibit 89. The Deer Camp Road includes the segment of road specifically set forth in Exhibit 89 and as exists on the ground.

Acceptance of the Deer Camp Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1138. The Deer Camp Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1139. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Deer Camp Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1140. The Deer Camp Road appears on the Grouse Creek (1971) USGS 7.5 minute and the Dairy Valley (1961) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1141. The County confirmed its acceptance of the Deer Camp Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Deer Camp Road pursuant to the County's governmental right and authority.

1142. Witnesses with personal knowledge of the history of the Deer Camp Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1143. Currently known reputation in the community is that the Deer Camp Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

1144. Public motor vehicle use of the Deer Camp Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1145. The Deer Camp Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1146. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Deer Camp Road.

1147. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Deer Camp Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dry Canyon Road, 2420

1148. The Dry Canyon Road, a Class D road, is designated as county road number 2420 and SGID road identification number RD020227 and is more or less 7.66 miles long.

1149. Exhibit 90 (attached hereto and incorporated herein) contains certain information pertaining to the Dry Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1150. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Dry Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 90. The Dry Canyon Road includes the segment of road specifically set forth in Exhibit 90 and as exists on the ground.

Acceptance of the Dry Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1151. The Dry Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1152. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Dry Canyon Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1153. The Dry Canyon Road appears on the Grouse Creek (1971), USGS 7.5 minute map and the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1154. The County confirmed its acceptance of the Dry Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dry Canyon Road pursuant to the County's governmental right and authority.

1155. Witnesses with personal knowledge of the history of the Dry Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

1156. Currently known reputation in the community is that the Dry Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1157. Public motor vehicle use of the Dry Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1158. The Dry Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1159. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dry Canyon Road.

1160. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dry Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Dry Canyon 2 Road, 2421

1161. The Dry Canyon 2 Road, a Class D road, is designated as county road number 2421 and SGID road identification number RD020228 and is more or less 1.30 miles long.

1162. Exhibit 91 (attached hereto and incorporated herein) contains certain information pertaining to the Dry Canyon 2 Road including: a map depicting the road; township, range and

section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1163. In this action, the State and County seek to quiet title to the public highway right-of-way for the Dry Canyon 2 Road solely as it crosses United States public land as included and specifically described in Exhibit 91. The Dry Canyon 2 Road includes the segment of road specifically set forth in Exhibit 91 and as exists on the ground.

Acceptance of the Dry Canyon 2 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1164. The Dry Canyon 2 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1165. The Dry Canyon 2 Road appears on the Grouse Creek (1971) and Ingham Canyon (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1166. The County confirmed its acceptance of the Dry Canyon 2 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Dry Canyon 2 Road pursuant to the County's governmental right and authority.

1167. Witnesses with personal knowledge of the history of the Dry Canyon 2 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1168. Currently known reputation in the community is that the Dry Canyon 2 Road has

been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1169. Public motor vehicle use of the Dry Canyon 2 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1170. The Dry Canyon 2 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1171. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Dry Canyon 2 Road.

1172. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Dry Canyon 2 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Tanner Ranch, 2436

1173. The Tanner Ranch Road, a Class D road, is designated as county road number 2436 and SGID road identification number RD020244 and is more or less 2.82 miles long.

1174. Exhibit 92 (attached hereto and incorporated herein) contains certain information pertaining to the Tanner Ranch Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1175. In this action, the State and County seek to quiet title to the public highway right-of-way for the Tanner Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 92. The Tanner Ranch Road includes the segment of road specifically set forth in Exhibit 92 and as exists on the ground.

Acceptance of the Tanner Ranch Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1176. The Tanner Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1177. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Tanner Ranch Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1178. The Tanner Ranch Road appears on the Dairy Valley (1961) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1179. The County confirmed its acceptance of the Tanner Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Tanner Ranch Road pursuant to the County's governmental right and authority.

1180. Witnesses with personal knowledge of the history of the Tanner Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

1181. Currently known reputation in the community is that the Tanner Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1182. Public motor vehicle use of the Tanner Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1183. The Tanner Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1184. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Tanner Ranch Road.

1185. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Tanner Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Upper Buckskin Spring Road, 2438

1186. The Upper Buckskin Spring Road, a Class D road, is designated as county road number 2438 and SGID road identification number RD020246 and is more or less 7.94 miles long.

1187. Exhibit 93 (attached hereto and incorporated herein) contains certain information

pertaining to the Upper Buckskin Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1188. In this action, the State and County seek to quiet title to the public highway right-of-way for the Upper Buckskin Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 93. The Upper Buckskin Spring Road includes the segment of road specifically set forth in Exhibit 93 and as exists on the ground.

Acceptance of the Upper Buckskin Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1189. The Upper Buckskin Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1190. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Upper Buckskin Spring Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1191. The Upper Buckskin Spring Road appears on the Grouse Creek (1971) USGS 7.5 minute and Cotton Thomas Basin (1959) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1192. The County confirmed its acceptance of the Upper Buckskin Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the Upper Buckskin Spring pursuant to the County's governmental right and authority.

1193. Witnesses with personal knowledge of the history of the Upper Buckskin Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1194. Currently known reputation in the community is that the Upper Buckskin Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1195. Public motor vehicle use of the Upper Buckskin Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1196. The Upper Buckskin Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1197. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Upper Buckskin Spring Road.

1198. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Upper Buckskin Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Upper Dry Canyon Road, 2439

1199. The Upper Dry Canyon Road, a Class D road, is designated as county road number 2439 and SGID road identification number RD020247 and is more or less 10.28 miles long.

1200. Exhibit 94 (attached hereto and incorporated herein) contains certain information pertaining to the Upper Dry Canyon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1201. In this action, the State and County seek to quiet title to the public highway right-of-way for the Upper Dry Canyon Road solely as it crosses United States public land as included and specifically described in Exhibit 94. The Upper Dry Canyon Road includes the segment of road specifically set forth in Exhibit 94 and as exists on the ground.

Acceptance of the Upper Dry Canyon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1202. The Upper Dry Canyon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1203. The Upper Dry Canyon Road appears on the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1204. The County confirmed its acceptance of the Upper Dry Canyon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Upper Dry Canyon Road pursuant to the County's governmental right and authority.

1205. Witnesses with personal knowledge of the history of the Upper Dry Canyon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1206. Currently known reputation in the community is that the Upper Dry Canyon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1207. Public motor vehicle use of the Upper Dry Canyon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1208. The Upper Dry Canyon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1209. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Upper Dry Canyon Road.

1210. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Upper Dry Canyon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2405 Road, 2405

1211. The 2405 Road, a Class D road, is designated as county road number 2405 and SGID road identification number RD020216 and is more or less 1.69 miles long.

1212. Exhibit 95 (attached hereto and incorporated herein) contains certain information pertaining to the 2405 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1213. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2405 Road solely as it crosses United States public land as included and specifically described in Exhibit 95. The 2405 Road includes the segment of road specifically set forth in Exhibit 95 and as exists on the ground.

Acceptance of the 2405 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1214. The 2405 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1215. The 2405 Road appears on the Grouse Creek (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1216. The County confirmed its acceptance of the 2405 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2405 Road pursuant to the County's governmental right and authority.

1217. Witnesses with personal knowledge of the history of the 2405 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1218. Currently known reputation in the community is that the 2405 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1219. Public motor vehicle use of the 2405 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1220. The 2405 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1221. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2405 Road.

1222. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2405 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2406 Road, 2406

1223. The 2406 Road, a Class D road, is designated as county road number 2406 and SGID road identification number RD020217 and is more or less 1.13 miles long.

1224. Exhibit 96 (attached hereto and incorporated herein) contains certain information

pertaining to the 2406 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1225. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2406 Road solely as it crosses United States public land as included and specifically described in Exhibit 96. The 2406 Road includes the segment of road specifically set forth in Exhibit 96 and as exists on the ground.

Acceptance of the 2406 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1226. The 2406 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1227. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the 2406 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1228. The County confirmed its acceptance of the 2406 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2406 Road pursuant to the County's governmental right and authority.

1229. Witnesses with personal knowledge of the history of the 2406 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1230. Currently known reputation in the community is that the 2406 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1231. Public motor vehicle use of the 2406 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1232. The 2406 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1233. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2406 Road.

1234. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2406 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

FOURTH CAUSE OF ACTION – QUIET TITLE
GOOSE CREEK AREA

1235. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1236. The Goose Creek Area is located in northwestern Box Elder County in the northwestern region of Utah.

1237. The Goose Creek Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Goose Creek Road, 1; (2) Hardister Road, 11; (3)

Meadow Butte Road, 28; (4) East Hardesty Road, 2422; (5) East Vipont Road, 2423; (6) Northwest Meadow Creek Road, 2428; (7) Pole Creek Road, 2429; (8) Southeast Hardesty Road, 2433; (9) Southeast Vipont Road, 2434; (10) 2408 Road, 2408; and (11) 2409 Road, 2409.

1238. Each right-of-way claimed in the Goose Creek Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

1239. All rights-of-way claimed in the Goose Creek Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

1240. All rights-of-way claimed in the Goose Creek Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

1241. Prior to October 21, 1976, the State of Utah, Box Elder County, and the public through continuous use accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Goose Creek, 1

1242. The Goose Creek Road, a Class B road, is designated as county road number 1 and SGID road identification number RD020001 and is more or less 21.36 miles long.

1243. Exhibit 97 (attached hereto and incorporated herein) contains certain information pertaining to the Goose Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1244. In this action, the State and County seek to quiet title to the public highway right-of-way for the Goose Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 97. The Goose Creek Road includes the segment of road specifically set forth in Exhibit 97 and as exists on the ground.

Acceptance of the Goose Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1245. The Goose Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1246. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Goose Creek Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1247. The Goose Creek Road appears on the Goose Creek (1961) and Cotton Thomas Basin (1959) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1248. The County confirmed its acceptance of the Goose Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Goose Creek Road using public funds pursuant to the County's governmental right and authority.

1249. Witnesses with personal knowledge of the history of the Goose Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1250. Currently known reputation in the community is that the Goose Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1251. Public motor vehicle use of the Goose Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1252. The Goose Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1253. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Goose Creek Road.

1254. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Goose Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Hardister Road, 11

1255. The Hardister Road, a Class B road, is designated as county road number 11 and SGID road identification number RD020015 and is more or less 2.21 miles long.

1256. Exhibit 98 (attached hereto and incorporated herein) contains certain information pertaining to the Hardister Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1257. In this action, the State and County seek to quiet title to the public highway right-of-way for the Hardister Road solely as it crosses United States public land as included and specifically described in Exhibit 98. The Hardister Road includes the segment of road specifically set forth in Exhibit 98 and as exists on the ground.

Acceptance of the Hardister Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1258. The Hardister Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1259. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Hardister Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1260. The Hardister Road appears on the Goose Creek (1961) USGS 15 minute

quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1261. The County confirmed its acceptance of the Hardister Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Hardister Road using public funds pursuant to the County's governmental right and authority.

1262. Witnesses with personal knowledge of the history of the Hardister Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1263. Currently known reputation in the community is that the Hardister Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1264. Public motor vehicle use of the Hardister Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1265. The Hardister Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1266. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Hardister Road.

1267. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Hardister Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Meadow Butte Road, 28

1268. The Meadow Butte Road, a Class B road, is designated as county road number 28 and SGID road identification number RD020069 and is more or less 10.11 miles long.

1269. Exhibit 99 (attached hereto and incorporated herein) contains certain information pertaining to the Meadow Butte Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1270. In this action, the State and County seek to quiet title to the public highway right-of-way for the Meadow Butte Road solely as it crosses United States public land as included and specifically described in Exhibit 99. The Meadow Butte Road includes the segment of road specifically set forth in Exhibit 99 and as exists on the ground.

Acceptance of the Meadow Butte Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1271. The Meadow Butte Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1272. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Meadow Butte Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1273. The Meadow Butte Road appears on the Goose Creek (1961) and Cotton Thomas Basin (1959) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1274. The County confirmed its acceptance of the Meadow Butte Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Meadow Butte Road using public funds pursuant to the County's governmental right and authority.

1275. Witnesses with personal knowledge of the history of the Meadow Butte Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1276. Currently known reputation in the community is that the Meadow Butte Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1277. Public motor vehicle use of the Meadow Butte Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1278. The Meadow Butte Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1279. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Meadow Butte Road.

1280. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Meadow Butte Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Hardesty Road, 2422

1281. The East Hardesty Road, a Class D road, is designated as county road number 2422 and SGID road identification number RD020229 and is more or less 9.72 miles long.

1282. Exhibit 100 (attached hereto and incorporated herein) contains certain information pertaining to the East Hardesty Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1283. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Hardesty Road solely as it crosses United States public land as included and specifically described in Exhibit 100. The East Hardesty Road includes the segment of road specifically set forth in Exhibit 100 and as exists on the ground.

Acceptance of the East Hardesty Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1284. The East Hardesty Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1285. 1976 aerial photography confirms the historical use, existence, and acceptance of

the right-of-way for the East Hardesty Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1286. The East Hardesty Road appears on the Goose Creek (1961) and Cotton Thomas Basin (1959) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1287. The County confirmed its acceptance of the East Hardesty Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Hardesty Road pursuant to the County's governmental right and authority.

1288. Witnesses with personal knowledge of the history of the East Hardesty Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1289. Currently known reputation in the community is that the East Hardesty Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1290. Public motor vehicle use of the East Hardesty Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

1291. The East Hardesty Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1292. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Hardesty Road.

1293. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Hardesty Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Vipont Road, 2423

1294. The East Vipont Road, a Class D road, is designated as county road number 2423 and SGID road identification number RD020230 and is more or less 5.14 miles long.

1295. Exhibit 101 (attached hereto and incorporated herein) contains certain information pertaining to the East Vipont Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1296. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Vipont Road solely as it crosses United States public land as included and specifically described in Exhibit 101. The East Vipont Road includes the segment of road specifically set forth in Exhibit 101 and as exists on the ground.

Acceptance of the East Vipont Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1297. The East Vipont Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1298. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the East Vipont Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1299. The East Vipont Road appears on the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1300. The County confirmed its acceptance of the East Vipont Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Vipont Road pursuant to the County's governmental right and authority.

1301. Witnesses with personal knowledge of the history of the East Vipont Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1302. Currently known reputation in the community is that the East Vipont Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1303. Public motor vehicle use of the East Vipont Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1304. The East Vipont Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1305. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Vipont Road.

1306. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Vipont Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Northwest Meadow Creek Road, 2428

1307. The Northwest Meadow Creek Road, a Class D road, is designated as county road number 2428 and SGID road identification number RD020235 and is more or less 2.25 miles long.

1308. Exhibit 102 (attached hereto and incorporated herein) contains certain information pertaining to the Northwest Meadow Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1309. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Northwest Meadow Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 102. The Northwest Meadow Creek Road includes the segment of road specifically set forth in Exhibit 102 and as exists on the ground.

Acceptance of the Northwest Meadow Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1310. The Northwest Meadow Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1311. Pre-1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Northwest Meadow Creek Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1312. The Northwest Meadow Creek Road appears on the Goose Creek (1961) and Cotton Thomas Basin (1959) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1313. The County confirmed its acceptance of the Northwest Meadow Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Northwest Meadow Creek Road pursuant to the County's governmental right and authority.

1314. Witnesses with personal knowledge of the history of the Northwest Meadow Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles

on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1315. Currently known reputation in the community is that the Northwest Meadow Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1316. Public motor vehicle use of the Northwest Meadow Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1317. The Northwest Meadow Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1318. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Northwest Meadow Creek Road.

1319. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Northwest Meadow Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pole Creek Road, 2429

1320. The Pole Creek Road, a Class D road, is designated as county road number 2429 and SGID road identification number RD020236 and is more or less 2.94 miles long.

1321. Exhibit 103 (attached hereto and incorporated herein) contains certain information

pertaining to the Pole Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1322. In this action, the State and County seek to quiet title to the public highway right-of-way for the Pole Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 103. The Pole Creek Road includes the segment of road specifically set forth in Exhibit 103 and as exists on the ground.

Acceptance of the Pole Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1323. The Pole Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1324. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Pole Creek Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1325. The Pole Creek Road appears on the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1326. The County confirmed its acceptance of the Pole Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Pole Creek Road pursuant to the County's governmental right and authority.

1327. Witnesses with personal knowledge of the history of the Pole Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1328. Currently known reputation in the community is that the Pole Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1329. Public motor vehicle use of the Pole Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1330. The Pole Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1331. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pole Creek Road.

1332. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pole Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Southeast Hardesty Road, 2433

1333. The Southeast Hardesty Road, a Class D road, is designated as county road number 2433 and SGID road identification number RD020240 and is more or less 2.94 miles

long.

1334. Exhibit 104 (attached hereto and incorporated herein) contains certain information pertaining to the Southeast Hardesty Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1335. In this action, the State and County seek to quiet title to the public highway right-of-way for the Southeast Hardesty Road solely as it crosses United States public land as included and specifically described in Exhibit 104. The Southeast Hardesty Road includes the segment of road specifically set forth in Exhibit 104 and as exists on the ground.

Acceptance of the Southeast Hardesty Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1336. The Southeast Hardesty Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1337. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Southeast Hardesty Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1338. The Southeast Hardesty Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Southeast Hardesty Road pursuant to the County's governmental right and authority.

1339. Witnesses with personal knowledge of the history of the Southeast Hardesty Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1340. Currently known reputation in the community is that the Southeast Hardesty Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1341. Public motor vehicle use of the Southeast Hardesty Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1342. The Southeast Hardesty Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1343. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Southeast Hardesty Road.

1344. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Southeast Hardesty Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Southeast Vipont Road, 2434

1345. The Southeast Vipont Road, a Class D road, is designated as county road number 2434 and SGID road identification number RD020241 and is more or less 3.28 miles long.

1346. Exhibit 105 (attached hereto and incorporated herein) contains certain information pertaining to the Southeast Vipont Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1347. In this action, the State and County seek to quiet title to the public highway right-of-way for the Southeast Vipont Road solely as it crosses United States public land as included and specifically described in Exhibit 105. The Southeast Vipont Road includes the segment of road specifically set forth in Exhibit 105 and as exists on the ground.

Acceptance of the Southeast Vipont Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1348. The Southeast Vipont Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1349. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Southeast Vipont Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1350. The Southeast Vipont Road appears on the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1351. The County confirmed its acceptance of the Southeast Vipont Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Southeast Vipont Road pursuant to the County's governmental right and authority.

1352. Witnesses with personal knowledge of the history of the Southeast Vipont Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1353. Currently known reputation in the community is that the Southeast Vipont Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1354. Public motor vehicle use of the Southeast Vipont Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1355. The Southeast Vipont Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1356. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Southeast Vipont Road.

1357. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Southeast Vipont Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2408 Road, 2408

1358. The 2408 Road, a Class D road, is designated as county road number 2408 and SGID road identification number RD020218 and is more or less 1.60 miles long.

1359. Exhibit 106 (attached hereto and incorporated herein) contains certain information pertaining to the 2408 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1360. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2408 Road solely as it crosses United States public land as included and specifically described in Exhibit 106. The 2408 Road includes the segment of road specifically set forth in Exhibit 106 and as exists on the ground.

Acceptance of the 2408 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1361. The 2408 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1362. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the 2408 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1363. The 2408 Road appears on the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1364. The County confirmed its acceptance of the 2408 Road by 1975, when it

designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2408 Road pursuant to the County's governmental right and authority.

1365. Witnesses with personal knowledge of the history of the 2408 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1366. Currently known reputation in the community is that the 2408 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1367. Public motor vehicle use of the 2408 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1368. The 2408 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1369. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2408 Road.

1370. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2408 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this

road.

2409 Road, 2409

1371. The 2409 Road, a Class D road, is designated as county road number 2409 and SGID road identification number RD020219 and is more or less 2.23 miles long.

1372. Exhibit 107 (attached hereto and incorporated herein) contains certain information pertaining to the 2409 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1373. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2409 Road solely as it crosses United States public land as included and specifically described in Exhibit 107. The 2409 Road includes the segment of road specifically set forth in Exhibit 107 and as exists on the ground.

Acceptance of the 2409 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1374. The 2409 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1375. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the 2409 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1376. The 2409 Road appears on the Cotton Thomas Basin (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1377. The County confirmed its acceptance of the 2409 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2409 Road pursuant to the County's governmental right and authority.

1378. Witnesses with personal knowledge of the history of the 2409 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1379. Currently known reputation in the community is that the 2409 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1380. Public motor vehicle use of the 2409 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1381. The 2409 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1382. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2409 Road.

1383. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2409 Road on lands owned by the United States as described herein and

including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

FIFTH CAUSE OF ACTION – QUIET TITLE
KELTON AREA

1384. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1385. The Kelton Area is located in north central Box Elder County in the northwestern region of Utah.

1386. The Kelton Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Kelton Road, 104; (2) Locamotive Springs Loop Road, 117; (3) Old Railroad Grade Road, 12.1; (4) Salt Wells Road, 135; (5) West Wildcat Hills Road, 105; (6) Wildcat Mountain Road, 106; (7) Cedar Hill East Road, 2114; (8) Deep Creek Road, 2115; (9) East Wildcat Road, 2104; (10) North Wildcat Road, 2102; (11) Pilot Spring Road, 2101; (12) Railroad Grade to Wildcat Road, 2116; (13) South Wildcat Road, 2108; (14) South Wildcat Road, 2113; (15) Wildcat Road, 2111; (16) 2105 Road, 2105; (17) 2106 Road, 2106; (18) 2107 Road, 2107; (19) 2109 Road, 2109; (20) 2110 Road, 2110; (21) 2112 Road, 2112; and (22) 2119 Road, 2119.

1387. Each right-of-way claimed in the Kelton Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

1388. All rights-of-way claimed in the Kelton Area are sufficient in scope for general

motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

1389. All rights-of-way claimed in the Kelton Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

1390. Prior to October 21, 1976, the State of Utah, Box Elder County, and the public through continuous use accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Kelton Road, 104

1391. The Kelton Road, a Class B road, is designated as county road number 104 and SGID road identification number RD020009 and is more or less 6.56 miles long.

1392. Exhibit 108 (attached hereto and incorporated herein) contains certain information pertaining to the Kelton Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1393. In this action, the State and County seek to quiet title to the public highway right-of-way for the Kelton Road solely as it crosses United States public land as included and specifically described in Exhibit 108. The Kelton Road includes the segment of road specifically

set forth in Exhibit 108 and as exists on the ground.

Acceptance of the Kelton Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1394. The Kelton Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1395. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Kelton Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1396. The Kelton Road appears on the Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1397. The County confirmed its acceptance of the Kelton Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Kelton Road using public funds pursuant to the County's governmental right and authority.

1398. Witnesses with personal knowledge of the history of the Kelton Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1399. Currently known reputation in the community is that the Kelton Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1400. Public motor vehicle use of the Kelton Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1401. The Kelton Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1402. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Kelton Road.

1403. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Kelton Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Locomotive Springs Loop Road, 117

1404. The Locomotive Springs Loop Road, a Class B road, is designated as county road number 117 and SGID road identification number RD020023 and is more or less 5.49 miles long.

1405. Exhibit109 (attached hereto and incorporated herein) contains certain information pertaining to the Locomotive Springs Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1406. In this action, the State and County seek to quiet title to the public highway right-of-way for the Locomotive Springs Loop Road solely as it crosses United States public land as

included and specifically described in Exhibit 109. The Locomotive Springs Loop Road includes the segment of road specifically set forth in Exhibit 109 and as exists on the ground.

Acceptance of the Locomotive Springs Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1407. The Locomotive Springs Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1408. The Locomotive Springs Loop Road appears on the Locomotive Springs (1969) and Monument Point (1968) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1409. The County confirmed its acceptance of the Locomotive Springs Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Locomotive Springs Loop Road using public funds pursuant to the County's governmental right and authority.

1410. Witnesses with personal knowledge of the history of the Locomotive Springs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1411. Currently known reputation in the community is that the Locomotive Springs Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1412. Public motor vehicle use of the Locomotive Springs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1413. The Locomotive Springs Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1414. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Locomotive Springs Road.

1415. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Locomotive Springs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Old Railroad Grade Road, 12.1

1416. The Old Railroad Grade Road, a Class B road, is designated as county road number 12.1 and SGID road identification number RD020027 and is more or less 14.18 miles long.

1417. Exhibit 110 (attached hereto and incorporated herein) contains certain information pertaining to the Old Railroad Grade Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1418. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Old Railroad Grade Road solely as it crosses United States public land as included and specifically described in Exhibit 110. The Old Railroad Grade Road includes the segment of road specifically set forth in Exhibit 110 and as exists on the ground.

Acceptance of the Old Railroad Grade Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1419. The Old Railroad Grade Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1420. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Old Railroad Grade Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1421. The Old Railroad Grade Road appears on the Locomotive Springs (1969), Monument Peak SW (1968), and the Crocodile Mtn NE (1969), USGS 7.5 minute and the Kelton Pass (1959) USGS 15 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1422. The County confirmed its acceptance of the Old Railroad Grade Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Old Railroad Grade Road using public funds pursuant to the County's governmental right and authority.

1423. Witnesses with personal knowledge of the history of the Old Railroad Grade Road

confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1424. Currently known reputation in the community is that the Old Railroad Grade Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1425. Public motor vehicle use of the Old Railroad Grade Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1426. The Old Railroad Grade Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1427. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Old Railroad Grade Road.

1428. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Old Railroad Grade Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Salt Wells Road, 135

1429. The Salt Wells Road, a Class B road, is designated as county road number 135 and SGID road identification number RD020044 and is more or less 19.47 miles long.

1430. Exhibit 111 (attached hereto and incorporated herein) contains certain information pertaining to the Salt Wells Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1431. In this action, the State and County seek to quiet title to the public highway right-of-way for the Salt Wells Road solely as it crosses United States public land as included and specifically described in Exhibit 111. The Salt Wells Road includes the segment of road specifically set forth in Exhibit 111 and as exists on the ground.

Acceptance of the Salt Wells Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1432. The Salt Wells Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1433. The Salt Wells Road appears on the Monument Point (1968), Lake Ridge (1968), and Sunset Pass (1968) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1434. The County confirmed its acceptance of the Salt Wells Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Salt Wells Road using public funds pursuant to the County's governmental right and authority.

1435. Witnesses with personal knowledge of the history of the Salt Wells Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous

basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1436. Currently known reputation in the community is that the Salt Wells Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1437. Public motor vehicle use of the Salt Wells Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1438. The Salt Wells Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1439. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Salt Wells Road.

1440. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Salt Wells Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

West Wildcat Hills Road, 105

1441. The West Wildcat Hills Road, a Class B road, is designated as county road number 105 and SGID road identification number RD020010 and is more or less 3.46 miles long.

1442. Exhibit 112 (attached hereto and incorporated herein) contains certain information

pertaining to the West Wildcat Hills Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1443. In this action, the State and County seek to quiet title to the public highway right-of-way for the West Wildcat Hills Road solely as it crosses United States public land as included and specifically described in Exhibit 112. The West Wildcat Hills Road includes the segment of road specifically set forth in Exhibit 112 and as exists on the ground.

Acceptance of the West Wildcat Hills Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1444. The West Wildcat Hills Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1445. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the West Wildcat Hills Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1446. The West Wildcat Hills Road appears on the Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1447. The County confirmed its acceptance of the West Wildcat Hills Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the West Wildcat Hills Road using public funds pursuant to the

County's governmental right and authority.

1448. Witnesses with personal knowledge of the history of the West Wildcat Hills Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1449. Currently known reputation in the community is that the West Wildcat Hills Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1450. Public motor vehicle use of the West Wildcat Hills Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1451. The West Wildcat Hills Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1452. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the West Wildcat Hills Road.

1453. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the West Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Wildcat Mountain Road, 106

1454. The Wildcat Mountain Road, a Class B road, is designated as county road number 106 and SGID road identification number RD020011 and is more or less 10.49 miles long.

1455. Exhibit 113 (attached hereto and incorporated herein) contains certain information pertaining to the Wildcat Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1456. In this action, the State and County seek to quiet title to the public highway right-of-way for the Wildcat Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 113. The Wildcat Mountain Road includes the segment of road specifically set forth in Exhibit 113 and as exists on the ground.

Acceptance of the Wildcat Mountain Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1457. The Wildcat Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1458. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Wildcat Mountain Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1459. The Wildcat Mountain Road appears on the Monument Peak NW (1968) USGS 7.5 minute map and the Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for

more detailed map information.

1460. The County confirmed its acceptance of the Wildcat Mountain Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Wildcat Mountain Road using public funds pursuant to the County's governmental right and authority.

1461. Witnesses with personal knowledge of the history of the Wildcat Mountain Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1462. Currently known reputation in the community is that the Wildcat Mountain Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1463. Public motor vehicle use of the Wildcat Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1464. The Wildcat Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1465. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Wildcat Mountain Road.

1466. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Wildcat Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Cedar Hill East Road, 2114

1467. The Cedar Hill East Road, a Class D road, is designated as county road number 2114 and SGID road identification number RD020181 and is more or less 3.46 miles long.

1468. Exhibit 114 (attached hereto and incorporated herein) contains certain information pertaining to the Cedar Hill East Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1469. In this action, the State and County seek to quiet title to the public highway right-of-way for the Cedar Hill East Road solely as it crosses United States public land as included and specifically described in Exhibit 114. The Cedar Hill East Road includes the segment of road specifically set forth in Exhibit 114 and as exists on the ground.

Acceptance of the Cedar Hill East Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1470. The Cedar Hill East Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1471. Aerial photography from 1978 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Cedar Hill East Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1472. The Cedar Hill East Road appears on the Monument Peak (1968) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1473. The Cedar Hill East Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Cedar Hill East Road using public funds pursuant to the County's governmental right and authority.

1474. Witnesses with personal knowledge of the history of the Cedar Hill East Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1475. Currently known reputation in the community is that the Cedar Hill East Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1476. Public motor vehicle use of the Cedar Hill East Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1477. The Cedar Hill East Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1478. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Cedar Hill East Road.

1479. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Cedar Hill East Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Deep Creek Road, 2115

1480. The Deep Creek Road, a Class D road, is designated as county road number 2115 and SGID road identification number RD020182 and is more or less 6.54 miles long.

1481. Exhibit 115 (attached hereto and incorporated herein) contains certain information pertaining to the Deep Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1482. In this action, the State and County seek to quiet title to the public highway right-of-way for the Deep Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 115. The Deep Creek Road includes the segment of road specifically set forth in Exhibit 115 and as exists on the ground.

Acceptance of the Deep Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1483. The Deep Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1484. Aerial photography from 1978 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Deep Creek Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography

continues to show the road as it existed prior to October 21, 1976.

1485. The Deep Creek Road appears on the Monument Peak SW (1968) and Locomotive Springs (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1486. The County confirmed its acceptance of the Deep Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Deep Creek Road pursuant to the County's governmental right and authority.

1487. Witnesses with personal knowledge of the history of the Deep Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1488. Currently known reputation in the community is that the Deep Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1489. Public motor vehicle use of the Deep Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1490. The Deep Creek Road traverses a valid and perfected R.S. 2477 public highway

right-of-way as described herein.

1491. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Deep Creek Road.

1492. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Deep Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

East Wildcat Road, 2104

1493. The East Wildcat Road, a Class D road, is designated as county road number 2104 and SGID road identification number RD020170 and is more or less 9.14 miles long.

1494. Exhibit 116 (attached hereto and incorporated herein) contains certain information pertaining to the East Wildcat Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1495. In this action, the State and County seek to quiet title to the public highway right-of-way for the East Wildcat Road solely as it crosses United States public land as included and specifically described in Exhibit 116. The East Wildcat Road includes the segment of road specifically set forth in Exhibit 116 and as exists on the ground.

Acceptance of the East Wildcat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1496. The East Wildcat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1497. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the East Wildcat Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1498. The East Wildcat Road appears on the Monument Peak SW (1968) and Monument Peak NW (1968) USGS 7.5 minute maps, and the Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1499. The County confirmed its acceptance of the East Wildcat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the East Wildcat Road pursuant to the County's governmental right and authority.

1500. Witnesses with personal knowledge of the history of the East Wildcat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1501. Currently known reputation in the community is that the East Wildcat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1502. Public motor vehicle use of the East Wildcat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1503. The East Wildcat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1504. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the East Wildcat Road.

1505. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the East Wildcat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Wildcat Road, 2102

1506. The North Wildcat Road, a Class D road, is designated as county road number 2102 and SGID road identification number RD020168 and is more or less 7.20 miles long.

1507. Exhibit 117 (attached hereto and incorporated herein) contains certain information pertaining to the North Wildcat Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1508. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Wildcat Road solely as it crosses United States public land as included and specifically described in Exhibit 117. The North Wildcat Road includes the segment of road specifically set forth in Exhibit 117 and as exists on the ground.

Acceptance of the North Wildcat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1509. The North Wildcat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1510. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the North Wildcat Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1511. The North Wildcat Road appears on the Monument Peak NW (1968) USGS 7.5 minute map and Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1512. The County confirmed its acceptance of the North Wildcat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Wildcat Road pursuant to the County's governmental right and authority.

1513. Witnesses with personal knowledge of the history of the North Wildcat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1514. Currently known reputation in the community is that the North Wildcat Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

1515. Public motor vehicle use of the North Wildcat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1516. The North Wildcat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1517. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Wildcat Road.

1518. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the North Wildcat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pilot Spring Road, 2101

1519. The Pilot Spring Road, a Class D road, is designated as county road number 2101 and SGID road identification number RD020167 and is more or less 5.53 miles long.

1520. Exhibit 118 (attached hereto and incorporated herein) contains certain information pertaining to the Pilot Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1521. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Pilot Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 118. The Pilot Spring Road includes the segment of road specifically set forth in Exhibit 118 and as exists on the ground.

Acceptance of the Pilot Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1522. The Pilot Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1523. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Pilot Spring Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1524. The Pilot Spring Road appears on the Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1525. The County confirmed its acceptance of the Pilot Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Pilot Spring Road pursuant to the County's governmental right and authority.

1526. Witnesses with personal knowledge of the history of the Pilot Springs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1527. Currently known reputation in the community is that the Pilot Springs Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1528. Public motor vehicle use of the Pilot Springs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1529. The Pilot Springs Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1530. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pilot Springs Road.

1531. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pilot Springs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Railroad Grade to Wildcat Road, 2116

1532. The Railroad Grade to Wildcat Road, a Class D road, is designated as county road number 2116 and SGID road identification number RD020183 and is more or less 3.41 miles long.

1533. Exhibit 119 (attached hereto and incorporated herein) contains certain information pertaining to the Railroad Grade to Wildcat Road including: a map depicting the road; township,

range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1534. In this action, the State and County seek to quiet title to the public highway right-of-way for the Railroad Grade to Wildcat Road solely as it crosses United States public land as included and specifically described in Exhibit 119. The Railroad Grade to Wildcat Road includes the segment of road specifically set forth in Exhibit 119 and as exists on the ground.

Acceptance of the Railroad Grade to Wildcat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1535. The Railroad Grade to Wildcat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1536. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Railroad Grade to Wildcat Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1537. The Railroad Grade to Wildcat Road appears on the Mountain Peak SW (1968) USGS 7.5 minute map and Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1538. The County confirmed its acceptance of the Railroad Grade to Wildcat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Railroad Grade to Wildcat Road pursuant to the

County's governmental right and authority.

1539. Witnesses with personal knowledge of the history of the Railroad Grade to Wildcat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1540. Currently known reputation in the community is that the Railroad Grade to Wildcat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1541. Public motor vehicle use of the Railroad Grade to Wildcat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1542. The Railroad Grade to Wildcat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1543. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Railroad Grade to Wildcat Road.

1544. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Railroad Grade to Wildcat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Wildcat Road, 2108

1545. The South Wildcat Road, a Class D road, is designated as county road number 2108 and SGID road identification number RD020175 and is more or less 5.27 miles long.

1546. Exhibit 120 (attached hereto and incorporated herein) contains certain information pertaining to the South Wildcat Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1547. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Wildcat Road solely as it crosses United States public land as included and specifically described in Exhibit 120. The South Wildcat Road includes the segment of road specifically set forth in Exhibit 120 and as exists on the ground.

Acceptance of the South Wildcat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1548. The South Wildcat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1549. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the South Wildcat Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1550. The South Wildcat Road appears on the Mountain Peak SW (1968) USGS 7.5 minute map and the Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1551. The County confirmed its acceptance of the South Wildcat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Wildcat Road pursuant to the County's governmental right and authority.

1552. Witnesses with personal knowledge of the history of the South Wildcat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1553. Currently known reputation in the community is that the South Wildcat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1554. Public motor vehicle use of the South Wildcat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1555. The South Wildcat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1556. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Wildcat Road.

1557. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the South Wildcat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Wildcat Road, 2113

1558. The South Wildcat Road, a Class D road, is designated as county road number 2113 and SGID road identification number RD020180 and is more or less 1.22 miles long.

1559. Exhibit 121 (attached hereto and incorporated herein) contains certain information pertaining to the South Wildcat Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1560. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Wildcat Road solely as it crosses United States public land as included and specifically described in Exhibit 121. The South Wildcat Road includes the segment of road specifically set forth in Exhibit 121 and as exists on the ground.

Acceptance of the South Wildcat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1561. The South Wildcat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1562. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the South Wildcat Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1563. The South Wildcat Road appears on the Kelton Pass (1959) USGS 15 minute

quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1564. The County confirmed its acceptance of the South Wildcat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Wildcat Road pursuant to the County's governmental right and authority.

1565. Witnesses with personal knowledge of the history of the South Wildcat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1566. Currently known reputation in the community is that the South Wildcat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1567. Public motor vehicle use of the South Wildcat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1568. The South Wildcat 2 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1569. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the South Wildcat Road.

1570. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Wildcat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Wildcat Road, 2111

1571. The Wildcat Road, a Class D road, is designated as county road number 2111 and SGID road identification number RD020178 and is more or less 5.10 miles long.

1572. Exhibit 122 (attached hereto and incorporated herein) contains certain information pertaining to the Wildcat Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1573. In this action, the State and County seek to quiet title to the public highway right-of-way for the Wildcat Road solely as it crosses United States public land as included and specifically described in Exhibit 122. The Wildcat Road includes the segment of road specifically set forth in Exhibit 122 and as exists on the ground.

Acceptance of the Wildcat Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1574. The Wildcat Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1575. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Wildcat Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show

the road as it existed prior to October 21, 1976.

1576. The Wildcat Road appears on the Kelton Pass (1959) 15 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1577. The County confirmed its acceptance of the Wildcat Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Wildcat Road pursuant to the County's governmental right and authority.

1578. Witnesses with personal knowledge of the history of the Wildcat Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1579. Currently known reputation in the community is that the Wildcat Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1580. Public motor vehicle use of the Wildcat Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1581. The Wildcat Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1582. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Wildcat Road.

1583. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Wildcat Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2105 Road, 2105

1584. The 2105 Road, a Class D road, is designated as county road number 2105 and SGID road identification number RD020171 and is more or less 4.01 miles long.

1585. Exhibit 125[2] (attached hereto and incorporated herein) contains certain information pertaining to the 2105 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1586. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2105 Road solely as it crosses United States public land as included and specifically described in Exhibit 125. The 2105 Road includes the segment of road specifically set forth in Exhibit 125 and as exists on the ground.

Acceptance of the 2105 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1587. The 2105 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1588. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the 2105 Road as a public highway located on the land at issue in this case

and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1589. The 2105 Road appears on the Monument Peak SW (1968) and Monument Peak NW (1968) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1590. The County confirmed its acceptance of the 2105 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2105 Road pursuant to the County's governmental right and authority.

1591. Witnesses with personal knowledge of the history of the 2105 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1592. Currently known reputation in the community is that the 2105 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1593. Public motor vehicle use of the 2105 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

[2] Exhibits 123 and 124 were intentionally omitted.

1594. The 2105 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1595. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2105 Road.

1596. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2105 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2106 Road, 2106

1597. The 2106 Road, a Class D road, is designated as county road number 2106 and SGID road identification number RD020172 and is more or less 4.00 miles long.

1598. Exhibit 126 (attached hereto and incorporated herein) contains certain information pertaining to the 2106 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1599. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2106 Road solely as it crosses United States public land as included and specifically described in Exhibit 126. The 2106 Road includes the segment of road specifically set forth in Exhibit 126 and as exists on the ground.

Acceptance of the 2106 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1600. The 2106 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1601. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the 2106 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1602. The 2106 Road appears on the Monument Peak NW (1968) USGS 7.5 minute map and the Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1603. The 2106 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2106 Road pursuant to the County's governmental right and authority.

1604. Witnesses with personal knowledge of the history of the 2106 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1605. Currently known reputation in the community is that the 2106 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1606. Public motor vehicle use of the 2106 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1607. The 2106 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1608. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2106 Road.

1609. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2106 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2107 Road, 2107

1610. The 2107 Road, a Class D road, is designated as county road number 2107 and SGID road identification number RD020174 and is more or less 0.50 miles long.

1611. Exhibit 127 (attached hereto and incorporated herein) contains certain information pertaining to the 2107 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1612. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2107 Road solely as it crosses United States public land as included and specifically described in Exhibit 127. The 2107 Road includes the segment of road specifically set forth in Exhibit 127 and as exists on the ground.

Acceptance of the 2107 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1613. The 2107 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1614. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the 2107 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1615. The 2107 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2107 Road pursuant to the County's governmental right and authority.

1616. Witnesses with personal knowledge of the history of the 2107 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1617. Currently known reputation in the community is that the 2107 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1618. Public motor vehicle use of the 2107 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1619. The 2107 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1620. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the 2107 Road.

1621. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2107 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2109 Road, 2109

1622. The 2109 Road, a Class D road, is designated as county road number 2109 and SGID road identification number RD020176 and is more or less 3.70 miles long.

1623. Exhibit 128 (attached hereto and incorporated herein) contains certain information pertaining to the 2109 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1624. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2109 Road solely as it crosses United States public land as included and specifically described in Exhibit 128. The 2109 Road includes the segment of road specifically set forth in Exhibit 128 and as exists on the ground.

Acceptance of the 2109 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1625. The 2109 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1626. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the 2109 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1627. The 2109 Road appears on the Monument Peak SW (1968) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1628. The County confirmed its acceptance of the 2109 by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2109 Road pursuant to the County's governmental right and authority.

1629. Witnesses with personal knowledge of the history of the 2109 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1630. Currently known reputation in the community is that the 2109 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1631. Public motor vehicle use of the 2109 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1632. The 2109 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1633. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2109 Road.

1634. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2109 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2110 Road, 2110

1635. The 2110 Road, a Class D road, is designated as county road number 2110 and SGID road identification number RD020177 and is more or less 1.44 miles long.

1636. Exhibit 129 (attached hereto and incorporated herein) contains certain information pertaining to the 2110 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1637. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2110 Road solely as it crosses United States public land as included and specifically described in Exhibit 129. The 2110 Road includes the segment of road specifically set forth in Exhibit 129 and as exists on the ground.

Acceptance of the 2110 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1638. The 2110 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1639. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the 2110 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1640. The 2110 Road was accepted as a County highway at least 10 years prior to

October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2110 Road pursuant to the County's governmental right and authority.

1641. Witnesses with personal knowledge of the history of the 2110 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1642. Currently known reputation in the community is that the 2110 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1643. Public motor vehicle use of the 2110 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1644. The 2110 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1645. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2110 Road.

1646. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2110 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2112 Road, 2112

1647. The 2112 Road, a Class D road, is designated as county road number 2112 and SGID road identification number RD020179 and is more or less 1.81 miles long.

1648. Exhibit 130 (attached hereto and incorporated herein) contains certain information pertaining to the 2112 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1649. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2112 Road solely as it crosses United States public land as included and specifically described in Exhibit 130. The 2112 Road includes the segment of road specifically set forth in Exhibit 130 and as exists on the ground.

Acceptance of the 2112 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1650. The 2112 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1651. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the 2112 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1652. The 2112 Road appears on the Monument Peak SW (1968) USGS 7.5 minute map and Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1653. The 2112 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2112 Road pursuant to the County's governmental right and authority.

1654. Witnesses with personal knowledge of the history of the 2112 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1655. Currently known reputation in the community is that the 2112 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1656. Public motor vehicle use of the 2112 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1657. The 2112 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1658. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2112 Road.

1659. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2112 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2119 Road, 2119

1660. The 2119 Road, a Class D road, is designated as county road number 2119 and SGID road identification number RD020185 and is more or less 1.06 miles long.

1661. Exhibit 131 (attached hereto and incorporated herein) contains certain information pertaining to the 2119 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1662. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2119 Road solely as it crosses United States public land as included and specifically described in Exhibit 131. The 2119 Road includes the segment of road specifically set forth in Exhibit 131 and as exists on the ground.

Acceptance of the 2119 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1663. The 2119 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1664. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the 2119 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1665. The 2119 Road appears on the Kelton Pass (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1666. The County confirmed its acceptance of the 2119 Road by 1975, when it

designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2119 Road pursuant to the County's governmental right and authority.

1667. Witnesses with personal knowledge of the history of the 2119 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1668. Currently known reputation in the community is that the 2119 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1669. Public motor vehicle use of the 2119 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1670. The 2119 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1671. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2119 Road.

1672. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2119 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SIXTH CAUSE OF ACTION – QUIET TITLE
LAKESIDE AREA

1673. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1674. The Lakeside Area is located in south central Box Elder County in the Northwestern region of Utah.

1675. The Lakeside Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Lakeside Road, 19; (2) Railroad to Newfoundland Road, 2805; (3) Railroad to Newfoundland 2 Road, 2806; (4) 2802 Road, 2802; and (5) 2804 Road, 2804.

1676. Each right-of-way claimed in the Lakeside Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

1677. All rights-of-way claimed in the Lakeside Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

1678. All rights-of-way claimed in the Lakeside Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

1679. Prior to October 21, 1976, the State of Utah, Box Elder County, and the public through continuous use accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Lakeside Road, 19

1680. The Lakeside Road, a Class B road, is designated as county road number 19 and SGID road identification number RD020061 and is more or less 15.95 miles long.

1681. Exhibit 132 (attached hereto and incorporated herein) contains certain information pertaining to the Lakeside Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1682. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lakeside Road solely as it crosses United States public land as included and specifically described in Exhibit 132. The Lakeside Road includes the segment of road specifically set forth in Exhibit 132 and as exists on the ground.

Acceptance of the Lakeside Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1683. The Lakeside Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1684. Aerial photography from 1973 and 1980 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Lakeside Road as a public highway located on the land at issue in this case and following the course described herein. More recent aerial photography continues to show the road as it existed prior to October 21, 1976.

1685. The Lakeside Road appears on the Strongs Knob (1969) and Lakeside (1969) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1686. The County confirmed its acceptance of the Lakeside by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lakeside Road using public funds pursuant to the County's governmental right and authority.

1687. Witnesses with personal knowledge of the history of the Lakeside Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1688. Currently known reputation in the community is that the Lakeside Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1689. Public motor vehicle use of the Lakeside Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1690. The Lakeside Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1691. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Lakeside Road.

1692. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lakeside Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Railroad to Newfoundland Road, 2805

1693. The Railroad to Newfoundland Road, a Class D road, is designated as county road number 2805 and SGID road identification number RD020326 and is more or less 45.14 miles long.

1694. Exhibit 133 (attached hereto and incorporated herein) contains certain information pertaining to the Railroad to Newfoundland Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1695. In this action, the State and County seek to quiet title to the public highway right-of-way for the Railroad to Newfoundland Road solely as it crosses United States public land as included and specifically described in Exhibit 133. The Railroad to Newfoundland Road includes the segment of road specifically set forth in Exhibit 133 and as exists on the ground.

Acceptance of the Railroad to Newfoundland Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1696. The Railroad to Newfoundland Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

Aerial photography from 1987 or earlier confirms the historical use, existence, and

acceptance of the right-of-way for the Railroad to Newfoundland Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1697. The County confirmed its acceptance of the Railroad to Newfoundland Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Railroad to Newfoundland Road pursuant to the County's governmental right and authority.

1698. Witnesses with personal knowledge of the history of the Railroad to Newfoundland Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1699. Currently known reputation in the community is that the Railroad to Newfoundland Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1700. Public motor vehicle use of the Railroad to Newfoundland Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1701. The Railroad to Newfoundland Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1702. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Railroad to Newfoundland Road.

1703. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Railroad to Newfoundland Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Railroad to Newfoundland 2 Road, 2806

1704. The Railroad to Newfoundland 2 Road, a Class D road, is designated as county road number 2806 and SGID road identification number RD020327 and is more or less 11.75 miles long.

1705. Exhibit 134 (attached hereto and incorporated herein) contains certain information pertaining to the Railroad to Newfoundland 2 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1706. In this action, the State and County seek to quiet title to the public highway right-of-way for the Railroad to Newfoundland 2 Road solely as it crosses United States public land as included and specifically described in Exhibit 134. The Railroad to Newfoundland 2 Road includes the segment of road specifically set forth in Exhibit 134 and as exists on the ground.

Acceptance of the Railroad to Newfoundland 2 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1707. The Railroad to Newfoundland 2 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

Aerial photography from 1987 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Railroad to Newfoundland 2 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1708. The County confirmed its acceptance of the Railroad to Newfoundland 2 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Railroad to Newfoundland 2 Road pursuant to the County's governmental right and authority.

1709. Witnesses with personal knowledge of the history of the Railroad to Newfoundland 2 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1710. Currently known reputation in the community is that the Railroad to Newfoundland 2 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1711. Public motor vehicle use of the Railroad to Newfoundland 2 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1712. The Railroad to Newfoundland 2 Road traverses a valid and perfected R.S. 2477

public highway right-of-way as described herein.

1713. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Railroad to Newfoundland 2 Road.

1714. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Railroad to Newfoundland 2 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2802 Road, 2802

1715. The 2802 Road, a Class D road, is designated as county road number 2802 and SGID road identification number RD020322 and is more or less 1.90 miles long.

1716. Exhibit 136[3] (attached hereto and incorporated herein) contains certain information pertaining to the 2802 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1717. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2802 Road solely as it crosses United States public land as included and specifically described in Exhibit 136. The 2802 Road includes the segment of road specifically set forth in Exhibit 136 and as exists on the ground.

[3] Exhibit 135 was intentionally omitted.

Acceptance of the 2802 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

The 2802 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

Aerial photography from 1987or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 2802 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1718. The 2802 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2802 Road pursuant to the County's governmental right and authority.

1719. Witnesses with personal knowledge of the history of the 2802 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1720. Currently known reputation in the community is that the 2802 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1721. Public motor vehicle use of the 2802 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1722. The 2802 Road traverses a valid and perfected R.S. 2477 public highway right-of-

way as described herein.

1723. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2802 Road.

1724. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2802 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2804 Road, 2804

1725. The 2804 Road, a Class D road, is designated as county road number 2804 and SGID road identification number RD020325 and is more or less 2.22 miles long.

1726. Exhibit 138[4] (attached hereto and incorporated herein) contains certain information pertaining to the 2804 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1727. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2804 Road solely as it crosses United States public land as included and specifically described in Exhibit 138. The 2804 Road includes the segment of road specifically set forth in Exhibit 138 and as exists on the ground.

[4] Exhibit 137 was intentionally omitted.

Acceptance of the 2804 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1728. The 2804 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1729. Aerial photography from 1987 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 2804 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

1730. The County confirmed its acceptance of the Railroad to 2804 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2804 Road pursuant to the County's governmental right and authority.

1731. Witnesses with personal knowledge of the history of the 2804 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1732. Currently known reputation in the community is that the 2804 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1733. Public motor vehicle use of the 2804 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1734. The 2804 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1735. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2804 Road.

1736. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2804 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

SEVENTH CAUSE OF ACTION – QUIET TITLE
MUD BASIN AREA

1737. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

1738. The Mud Basin Area is located in central western Box Elder County in the northwestern region of Utah.

1739. The Mud Basin Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Bedke Spring Road, 43; (2) Emigrant Pass Road, 3; (3) Ingham Pass Road, 6; (4) Keg Springs Road, 5; (5) Mud Basin Road, 73; (6) Muddy Ranch Road, 18; (7) Bypass Road, 2612; (8) Central Warm Springs Hill Road, 2209; (9) Chournos Access Road, 2613; (10) Crystal Mountain Road , 2614; (11) Devils Playground Road, 2615; (12) Ingham Peak Ridge Road, 2617; (13) Mud Basin Road, 2618; (14) Muddy Creek Road, 2212; (15) North Ridge Road, 2619; (16) Prospect Road, 2620; (17) Prospect 1 Road, 2621; (18) Prospect 2 Road, 2622; (19) Red Butte Road, 2623; (20) Red Butte B Road, 2623B; (21)

Rocky Road, 2624; (22) Rocky Pass Ridge Road, 2625; (23) Rosebud Spring Road, 2213; (24) Sheep Spring Road, 2215; (25) Sheep Spring B Road, 2215B; (26) South Warm Springs Hill Road, 2217; (27) Southwest Mud Basin Road, 2626; (28) Warm Springs Hill Road, 2218; (29) West Mud Basin Road, 2627; (30) White Clay Road, 2628; (31) 2201 Road, 2201; (32) 2205 Road, 2205; (33) 2207 Road, 2207; (34) 2601 Road, 2601; (35) 2602 Road, 2602; (36) 2603 Road, 2603; (37) 2604 Road, 2604; (38) 2607 Road, 2607; and (39) 2609 Road, 2609.

1740. Each right-of-way claimed in the Mud Basin Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

1741. All rights-of-way claimed in the Mud Basin Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

1742. All rights-of-way claimed in the Mud Basin Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

1743. Prior to October 21, 1976, the State of Utah, Box Elder County, and the public through continuous use accepted the congressional grant of an R.S. 2477 right-of-way for the

entire length and course of all roads as described herein, on public lands owned by the United States.

Bedke Spring Road, 43

1744. The Bedke Spring Road, a Class B road, is designated as county road number 43 and SGID road identification number RD020094 and is more or less 4.01 miles long.

1745. Exhibit 139 (attached hereto and incorporated herein) contains certain information pertaining to the Bedke Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1746. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bedke Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 139. The Bedke Spring Road includes the segment of road specifically set forth in Exhibit 139 and as exists on the ground.

Acceptance of the Bedke Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1747. The Bedke Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1748. The Bedke Spring Road appears on the Grouse Creek (1971) and Ingham Canyon (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1749. The County confirmed its acceptance of the Bedke Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Bedke Spring Road using public funds pursuant to the County's governmental right and authority.

1750. Witnesses with personal knowledge of the history of the Bedke Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1751. Currently known reputation in the community is that the Bedke Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1752. Public motor vehicle use of the Bedke Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1753. The Bedke Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1754. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bedke Spring Road.

1755. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bedke Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Emigrant Pass Road, 3

1756. The Emigrant Pass Road, a Class B road, is designated as county road number 3 and SGID road identification number RD020071 and is more or less 15.93 miles long.

1757. Exhibit 140 (attached hereto and incorporated herein) contains certain information pertaining to the Emigrant Pass Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1758. In this action, the State and County seek to quiet title to the public highway right-of-way for the Emigrant Pass Road solely as it crosses United States public land as included and specifically described in Exhibit 140. The Emigrant Pass Road includes the segment of road specifically set forth in Exhibit 140 and as exists on the ground.

Acceptance of the Emigrant Pass Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1759. The Emigrant Pass Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1760. The Emigrant Pass Road appears on the Prohibition Spring (1971), Emigrant Pass (1971), and Lucin NE (1967) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1761. The County confirmed its acceptance of the Emigrant Pass Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Emigrant Pass Road using public funds pursuant to the County's

governmental right and authority.

1762. Witnesses with personal knowledge of the history of the Emigrant Pass Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1763. Currently known reputation in the community is that the Emigrant Pass Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1764. Public motor vehicle use of the Emigrant Pass Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1765. The Emigrant Pass Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1766. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Emigrant Pass Road.

1767. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Emigrant Pass Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Ingham Pass Road, 6

1768. The Ingham Pass Road, a Class B road, is designated as county road number 6 and SGID road identification number RD020118 and is more or less 18.50 miles long.

1769. Exhibit 141 (attached hereto and incorporated herein) contains certain information pertaining to the Ingham Pass Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1770. In this action, the State and County seek to quiet title to the public highway right-of-way for the Ingham Pass Road solely as it crosses United States public land as included and specifically described in Exhibit 141. The Ingham Pass Road includes the segment of road specifically set forth in Exhibit 141 and as exists on the ground.

Acceptance of the Ingham Pass Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1771. The Ingham Pass Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1772. The Ingham Pass Road appears on the Grouse Creek (1971), Ingham Canyon (1971) Potters Creek (1971), Emigrant Pass (1971), and Prohibition Spring (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1773. The County confirmed its acceptance of the Ingham Pass Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Ingham Pass Road using public funds pursuant to the County's

governmental right and authority.

1774. Witnesses with personal knowledge of the history of the Ingham Pass Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1775. Currently known reputation in the community is that the Ingham Pass Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1776. Public motor vehicle use of the Ingham Pass Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1777. The Ingham Pass Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1778. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Ingham Pass Road.

1779. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Ingham Pass Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Keg Springs Road, 5

1780. The Keg Springs Road, a Class B road, is designated as county road number 5 and SGID road identification number RD020101 and is more or less 14.98 miles long.

1781. Exhibit 142 (attached hereto and incorporated herein) contains certain information pertaining to the Keg Springs Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1782. In this action, the State and County seek to quiet title to the public highway right-of-way for the Keg Springs Road solely as it crosses United States public land as included and specifically described in Exhibit 142. The Keg Springs Road includes the segment of road specifically set forth in Exhibit 142 and as exists on the ground.

Acceptance of the Keg Springs Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1783. The Keg Springs Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1784. The Keg Springs Road appears on the Toms Cabin Spring (1971), Rocky Pass Peak (1971), and Emigrant Pass (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1785. The County confirmed its acceptance of the Keg Springs Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Keg Springs Road using public funds pursuant to the County's

governmental right and authority.

1786. Witnesses with personal knowledge of the history of the Keg Springs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1787. Currently known reputation in the community is that the Keg Springs Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1788. Public motor vehicle use of the Keg Springs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1789. The Keg Springs Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1790. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Keg Springs Road.

1791. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Keg Springs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Mud Basin Road, 73

1792. The Mud Basin Road is designated as county road number 73 and SGID road identification number RD020134 and is more or less 7.27 miles long.

1793. Exhibit 143 (attached hereto and incorporated herein) contains certain information pertaining to the Mud Basin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1794. In this action, the State and County seek to quiet title to the public highway right-of-way for the Mud Basin Road solely as it crosses United States public land as included and specifically described in Exhibit 143. The Mud Basin Road includes the segment of road specifically set forth in Exhibit 143 and as exists on the ground.

Acceptance of the Mud Basin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1795. The Mud Basin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1796. The Mud Basin Road appears on the Lucin NE (1976) and Rocky Pass Peak (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1797. The County confirmed its acceptance of the Mud Basin Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Mud Basin Road using public funds pursuant to the County's governmental right and authority.

1798. Witnesses with personal knowledge of the history of the Mud Basin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1799. Currently known reputation in the community is that the Mud Basin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1800. Public motor vehicle use of the Mud Basin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1801. The Mud Basin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1802. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Mud Basin Road.

1803. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Mud Basin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Muddy Ranch Road, 18

1804. The Muddy Ranch Road, a Class B road, is designated as county road number 18 and SGID road identification number RD020060 and is more or less 4.98 miles long.

1805. Exhibit 144 (attached hereto and incorporated herein) contains certain information pertaining to the Muddy Ranch Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1806. In this action, the State and County seek to quiet title to the public highway right-of-way for the Muddy Ranch Road solely as it crosses United States public land as included and specifically described in Exhibit 144. The Muddy Ranch Road includes the segment of road specifically set forth in Exhibit 144 and as exists on the ground.

Acceptance of the Muddy Ranch Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1807. The Muddy Ranch Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1808. The Muddy Ranch Road appears on the Warm Springs Hills (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1809. The County confirmed its acceptance of the Muddy Ranch Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Muddy Ranch Road using public funds pursuant to the County's governmental right and authority.

1810. Witnesses with personal knowledge of the history of the Muddy Ranch Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

1811. Currently known reputation in the community is that the Muddy Ranch Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1812. Public motor vehicle use of the Muddy Ranch Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1813. The Muddy Ranch Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1814. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Muddy Ranch Road.

1815. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Muddy Ranch Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Bypass Road, 2612

1816. The Bypass Road, a Class D road, is designated as county road number 2612 and SGID road identification number RD020284 and is more or less 6.69 miles long.

1817. Exhibit 145 (attached hereto and incorporated herein) contains certain information pertaining to the Bypass Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1818. In this action, the State and County seek to quiet title to the public highway right-of-way for the Bypass Road solely as it crosses United States public land as included and specifically described in Exhibit 145. The Bypass Road includes the segment of road specifically set forth in Exhibit 145 and as exists on the ground.

Acceptance of the Bypass Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1819. The Bypass Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1820. The Bypass Road appears on the Emigrant Pass (1971) and Potters Creek (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1821. The County confirmed its acceptance of the Bypass Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Bypass Road using public funds pursuant to the County's governmental right and authority.

1822. Witnesses with personal knowledge of the history of the Bypass Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1823. Currently known reputation in the community is that the Bypass Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10

years prior to October 21, 1976, and continuing to the present.

1824. Public motor vehicle use of the Bypass Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1825. The Bypass Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1826. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Bypass Road.

1827. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Bypass Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Central Warm Springs Hill, 2209

1828. The Central Warm Springs Hill Road, a Class D road, is designated as county road number 2209 and SGID road identification number RD020194 and is more or less 4.33 miles long.

1829. Exhibit 146 (attached hereto and incorporated herein) contains certain information pertaining to the Central Warm Springs Hill Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1830. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Central Warm Springs Hill Road solely as it crosses United States public land as included and specifically described in Exhibit 146. The Central Warm Springs Hill Road includes the segment of road specifically set forth in Exhibit 146 and as exists on the ground.

Acceptance of the Central Warm Springs Hill Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1831. The Central Warm Springs Hill Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1832. The Central Warm Springs Hill Road appears on the Warm Springs Hills (1971) USGS 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1833. The County confirmed its acceptance of the Central Warm Springs Hill Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Central Warm Springs Hill Road pursuant to the County's governmental right and authority.

1834. Witnesses with personal knowledge of the history of the Central Warm Springs Hill Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1835. Currently known reputation in the community is that the Central Warm Springs Hill Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1836. Public motor vehicle use of the Central Warm Springs Hill Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1837. The Central Warm Springs Hill Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1838. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Central Warm Springs Hill Road.

1839. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Central Warm Springs Hill Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Chournos Access Road, 2613

1840. The Chournos Access Road, a Class D road, is designated as county road number 2613 and SGID road identification number RD020072 and is more or less 3.89 miles long.

1841. Exhibit 147 (attached hereto and incorporated herein) contains certain information pertaining to the Chournos Access Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1842. In this action, the State and County seek to quiet title to the public highway right-of-way for the Chournos Access Road solely as it crosses United States public land as included

and specifically described in Exhibit 147. The Chournos Access Road includes the segment of road specifically set forth in Exhibit 147 and as exists on the ground.

Acceptance of the Chournos Access Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1843. The Chournos Access Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1844. The Chournos Access Road appears on the Luclin NE (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1845. The Chournos Access Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Chournos Access Road pursuant to the County's governmental right and authority.

1846. Witnesses with personal knowledge of the history of the Chournos Access Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1847. Currently known reputation in the community is that the Chournos Access Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1848. Public motor vehicle use of the Chournos Access Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1849. The Chournos Access Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1850. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Chournos Access Road.

1851. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Chournos Access Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Crystal Mountain Road, 2614

1852. The Crystal Mountain Road, a Class D road, is designated as county road number 2614 and SGID road identification number RD020285 and is more or less 6.27 miles long.

1853. Exhibit 148 (attached hereto and incorporated herein) contains certain information pertaining to the Crystal Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1854. In this action, the State and County seek to quiet title to the public highway right-of-way for the Crystal Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 148. The Crystal Mountain Road includes the segment of road specifically set forth in Exhibit 148 and as exists on the ground.

Acceptance of the Crystal Mountain Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1855. The Crystal Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1856. The Crystal Mountain Road appears on the Emigrant Pass (1971) and Prohibition Spring (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1857. The Crystal Mountain Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Crystal Mountain Road pursuant to the County's governmental right and authority.

1858. Witnesses with personal knowledge of the history of the Crystal Mountain Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1859. Currently known reputation in the community is that the Crystal Mountain Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1860. Public motor vehicle use of the Crystal Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

1861. The Crystal Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1862. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Crystal Mountain Road.

1863. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Crystal Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Devils Playground Road, 2615

1864. The Devils Playground Road is designated as county road number 2615 and SGID road identification number RD020286 and is more or less 6.37 miles long.

1865. Exhibit 149 (attached hereto and incorporated herein) contains certain information pertaining to the Devils Playground Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1866. In this action, the State and County seek to quiet title to the public highway right-of-way for the Devils Playground Road solely as it crosses United States public land as included and specifically described in Exhibit 149. The Devils Playground Road includes the segment of road specifically set forth in Exhibit 149 and as exists on the ground.

Acceptance of the Devils Playground Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1867. The Devils Playground Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1868. The Devils Playground Road appears on the Emigrant Pass (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1869. The County confirmed its acceptance of the Devils Playground Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Devils Playground Road pursuant to the County's governmental right and authority.

1870. Witnesses with personal knowledge of the history of the Devils Playground Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1871. Currently known reputation in the community is that the Devils Playground Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1872. Public motor vehicle use of the Devils Playground Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

1873. The Devils Playground Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1874. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Devils Playground Road.

1875. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Devils Playground Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Ingham Peak Ridge Road, 2617

1876. The Ingham Peak Ridge Road, a Class D road, is designated as county road number 2617 and SGID road identification number RD020287 and is more or less 12.98 miles long.

1877. Exhibit 150 (attached hereto and incorporated herein) contains certain information pertaining to the Ingham Peak Ridge Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1878. In this action, the State and County seek to quiet title to the public highway right-of-way for the Ingham Peak Ridge Road solely as it crosses United States public land as included and specifically described in Exhibit 150. The Ingham Peak Ridge Road includes the segment of road specifically set forth in Exhibit 150 and as exists on the ground.

Acceptance of the Ingham Peak Ridge Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1879. The Ingham Peak Ridge Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1880. The Ingham Peak Ridge Road appears on the Rocky Pass Peak (1971), Ingham Canyon (1971), and Emigrant Pass (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1881. The County confirmed its acceptance of the Ingham Peak Ridge Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Ingham Peak Ridge Road using public funds pursuant to the County's governmental right and authority.

1882. Witnesses with personal knowledge of the history of the Ingham Peak Ridge Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1883. Currently known reputation in the community is that the Ingham Peak Ridge Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1884. Public motor vehicle use of the Ingham Peak Ridge Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1885. The Ingham Peak Ridge Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1886. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Ingham Peak Ridge Road.

1887. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Ingham Peak Ridge Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Mud Basin Road, 2618

1888. The Mud Basin Road, a Class D road, is designated as county road number 2618 and SGID road identification number RD020288 and is more or less 1.68 miles long.

1889. Exhibit 151 (attached hereto and incorporated herein) contains certain information pertaining to the Mud Basin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1890. In this action, the State and County seek to quiet title to the public highway right-of-way for the Mud Basin Road solely as it crosses United States public land as included and specifically described in Exhibit 151. The Mud Basin Road includes the segment of road specifically set forth in Exhibit 151 and as exists on the ground.

Acceptance of the Mud Basin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1891. The Mud Basin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1892. The Mud Basin Road appears on the Rocky Pass Peak (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1893. The Mud Basin Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Mud Basin Road pursuant to the County's governmental right and authority.

1894. Witnesses with personal knowledge of the history of the Mud Basin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1895. Currently known reputation in the community is that the Mud Basin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1896. Public motor vehicle use of the Mud Basin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1897. The Mud Basin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1898. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Mud Basin Road.

1899. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Mud Basin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Muddy Creek Road, 2212

1900. The Muddy Creek Road, a Class D road, is designated as county road number 2212 and SGID road identification number RD020197 and is more or less 4.98 miles long.

1901. Exhibit 152 (attached hereto and incorporated herein) contains certain information pertaining to the Muddy Creek Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1902. In this action, the State and County seek to quiet title to the public highway right-of-way for the Muddy Creek Road solely as it crosses United States public land as included and specifically described in Exhibit 152. The Muddy Creek Road includes the segment of road specifically set forth in Exhibit 152 and as exists on the ground.

Acceptance of the Muddy Creek Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1903. The Muddy Creek Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1904. The Muddy Creek Road appears on the Potters Creek (1971) and Warm Springs

Hills (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1905. The County confirmed its acceptance of the Muddy Creek Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Muddy Creek Road pursuant to the County's governmental right and authority.

1906. Witnesses with personal knowledge of the history of the Muddy Creek Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1907. Currently known reputation in the community is that the Muddy Creek Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1908. Public motor vehicle use of the Muddy Creek Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1909. The Muddy Creek Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1910. Without confirmation from the United States, a cloud remains on the State and

County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Muddy Creek Road.

1911. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Muddy Creek Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

North Ridge Road, 2619

1912. The North Ridge Road, a Class D road, is designated as county road number 2619 and SGID road identification number RD020289 and is more or less 5.69 miles long.

1913. Exhibit 153 (attached hereto and incorporated herein) contains certain information pertaining to the North Ridge Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1914. In this action, the State and County seek to quiet title to the public highway right-of-way for the North Ridge Road solely as it crosses United States public land as included and specifically described in Exhibit 153. The North Ridge Road includes the segment of road specifically set forth in Exhibit 153 and as exists on the ground.

Acceptance of the North Ridge Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1915. The North Ridge Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1916. The North Ridge Road appears on the Potters Creek (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way

underlying this road. See Exhibit 12 for more detailed map information.

1917. The North Ridge Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the North Ridge Road pursuant to the County's governmental right and authority.

1918. Witnesses with personal knowledge of the history of the North Ridge Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1919. Currently known reputation in the community is that the North Ridge Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1920. Public motor vehicle use of the North Ridge Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1921. The North Ridge Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1922. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the North Ridge Road.

1923. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the North Ridge Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Prospect Road, 2620

1924. The Prospect Road, a Class D road, is designated as county road number 2620 and SGID road identification number RD020290 and is more or less 3.45 miles long.

1925. Exhibit 154 (attached hereto and incorporated herein) contains certain information pertaining to the Prospect Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1926. In this action, the State and County seek to quiet title to the public highway right-of-way for the Prospect Road solely as it crosses United States public land as included and specifically described in Exhibit 154. The Prospect Road includes the segment of road specifically set forth in Exhibit 154 and as exists on the ground.

Acceptance of the Prospect Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1927. The Prospect Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1928. The Prospect Road appears on the Emigrant Pass (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1929. The Prospect Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the Prospect Road pursuant to the County's governmental right and authority.

1930. Witnesses with personal knowledge of the history of the Prospect Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1931. Currently known reputation in the community is that the Prospect Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1932. Public motor vehicle use of the Prospect Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1933. The Prospect Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1934. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Prospect Road.

1935. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Prospect Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Prospect 1 Road, 2621

1936. The Prospect 1 Road, a Class D road, is designated as county road number 2621

and SGID road identification number RD020291 and is more or less 11.55 miles long.

1937. Exhibit 155 (attached hereto and incorporated herein) contains certain information pertaining to the Prospect 1 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1938. In this action, the State and County seek to quiet title to the public highway right-of-way for the Prospect 1 Road solely as it crosses United States public land as included and specifically described in Exhibit 155. The Prospect 1 Road includes the segment of road specifically set forth in Exhibit 155 and as exists on the ground.

Acceptance of the Prospect 1 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1939. The Prospect 1 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1940. The Prospect 1 Road appears on the Toms Cabin Spring (1971), Rocky Pass Peak (1971) and Emigrant Pass (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1941. The County confirmed its acceptance of the Prospect 1 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Prospect 1 Road pursuant to the County's governmental right and authority.

1942. Witnesses with personal knowledge of the history of the Prospect 1 Road confirm

public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1943. Currently known reputation in the community is that the Prospect 1 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1944. Public motor vehicle use of the Prospect 1 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1945. The Prospect 1 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1946. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Prospect 1 Road.

1947. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Prospect 1 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Prospect 2 Road, 2622

1948. The Prospect 2 Road, a Class D road, is designated as county road number 2622 and SGID road identification number RD020292 and is more or less 3.61 miles long.

1949. Exhibit 156 (attached hereto and incorporated herein) contains certain information

pertaining to the Prospect 2 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1950. In this action, the State and County seek to quiet title to the public highway right-of-way for the Prospect 2 Road solely as it crosses United States public land as included and specifically described in Exhibit 156. The Prospect 2 Road includes the segment of road specifically set forth in Exhibit 156 and as exists on the ground.

Acceptance of the Prospect 2 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1951. The Prospect 2 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1952. The Prospect 2 Road appears on the Lucin NE (1967) and Rocky Pass Peak (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1953. The Prospect 2 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Prospect 2 Road pursuant to the County's governmental right and authority.

1954. Witnesses with personal knowledge of the history of the Prospect 2 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1955. Currently known reputation in the community is that the Prospect 2 Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

1956. Public motor vehicle use of the Prospect 2 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1957. The Prospect 2 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1958. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Prospect 2 Road.

1959. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Prospect 2 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Red Butte Road, 2623

1960. The Red Butte Road, a Class D road, is designated as county road number 2623 and SGID road identification number RD020293 and is more or less 6.81 miles long.

1961. Exhibit 157 (attached hereto and incorporated herein) contains certain information pertaining to the Red Butte Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1962. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Red Butte Road solely as it crosses United States public land as included and specifically described in Exhibit 157. The Red Butte Road includes the segment of road specifically set forth in Exhibit 157 and as exists on the ground.

Acceptance of the Red Butte Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1963. The Red Butte Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1964. The Red Butte Road appears on the Ingham Canyon (1971) and Grouse Creek (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1965. The County confirmed its acceptance of the Red Butte Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Red Butte Road pursuant to the County's governmental right and authority.

1966. Witnesses with personal knowledge of the history of the Red Butte Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1967. Currently known reputation in the community is that the Red Butte Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1968. Public motor vehicle use of the Red Butte Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1969. The Red Butte Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1970. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Red Butte Road.

1971. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Red Butte Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Red Butte B Road, 2623B

1972. The Red Butte B Road, a Class D road, is designated as county road number 2623B and SGID road identification number RD020294 and is more or less 1.93 miles long.

1973. Exhibit 158 (attached hereto and incorporated herein) contains certain information pertaining to the Red Butte B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1974. In this action, the State and County seek to quiet title to the public highway right-of-way for the Red Butte B Road solely as it crosses United States public land as included and specifically described in Exhibit 158. The Red Butte B Road includes the segment of road specifically set forth in Exhibit 158 and as exists on the ground.

Acceptance of the Red Butte B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1975. The Red Butte B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1976. The Red Butte B Road appears on the Ingham Canyon (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1977. The Red Butte B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Red Butte B Road pursuant to the County's governmental right and authority.

1978. Witnesses with personal knowledge of the history of the Red Butte B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1979. Currently known reputation in the community is that the Red Butte B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1980. Public motor vehicle use of the Red Butte B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1981. The Red Butte B Road traverses a valid and perfected R.S. 2477 public highway

right-of-way as described herein.

1982. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Red Butte B Road.

1983. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Red Butte B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Rocky Road, 2624

1984. The Rocky Road, a Class D road, is designated as county road number 2624 and SGID road identification number RD020295 and is more or less 5.04 miles long.

1985. Exhibit 159 (attached hereto and incorporated herein) contains certain information pertaining to the Rocky Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1986. In this action, the State and County seek to quiet title to the public highway right-of-way for the Rocky Road solely as it crosses United States public land as included and specifically described in Exhibit 159. The Rocky Road includes the segment of road specifically set forth in Exhibit 159 and as exists on the ground.

Acceptance of the Rocky Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1987. The Rocky Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

1988. The Rocky Road appears on the Ingham Canyon (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

1989. The County confirmed its acceptance of the Rocky Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Rocky Road pursuant to the County's governmental right and authority.

1990. Witnesses with personal knowledge of the history of the Rocky Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

1991. Currently known reputation in the community is that the Rocky Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

1992. Public motor vehicle use of the Rocky Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

1993. The Rocky Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

1994. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Rocky Road.

1995. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Rocky Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Rocky Pass Ridge Road, 2625

1996. The Rocky Pass Ridge Road, a Class D road, is designated as county road number 2625 and SGID road identification number RD020296 and is more or less 2.85 miles long.

1997. Exhibit 160 (attached hereto and incorporated herein) contains certain information pertaining to the Rocky Pass Ridge Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

1998. In this action, the State and County seek to quiet title to the public highway right-of-way for the Rocky Pass Ridge Road solely as it crosses United States public land as included and specifically described in Exhibit 160. The Rocky Pass Ridge Road includes the segment of road specifically set forth in Exhibit 160 and as exists on the ground.

Acceptance of the Rocky Pass Ridge Road R.S. 2477 Right-of-way Prior to October 21, 1976.

1999. The Rocky Pass Ridge Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2000. The Rocky Pass Ridge Road appears on the Rocky Pass Peak (1971) and Emigrant Pass (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map

information.

2001. The County confirmed its acceptance of the Rocky Pass Ridge Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Rocky Pass Ridge Road pursuant to the County's governmental right and authority.

2002. Witnesses with personal knowledge of the history of the Rocky Pass Ridge Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2003. Currently known reputation in the community is that the Rocky Pass Ridge Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2004. Public motor vehicle use of the Rocky Pass Ridge Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2005. The Rocky Pass Ridge Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2006. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Rocky Pass Ridge Road.

2007. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Rocky Pass Ridge Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Rosebud Spring Road, 2213

2008. The Rosebud Spring Road, a Class D road, is designated as county road number 2213 and SGID road identification number RD020198 and is more or less 2.42 miles long.

2009. Exhibit 161 (attached hereto and incorporated herein) contains certain information pertaining to the Rosebud Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2010. In this action, the State and County seek to quiet title to the public highway right-of-way for the Rosebud Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 161. The Rosebud Spring Road includes the segment of road specifically set forth in Exhibit 161 and as exists on the ground.

Acceptance of the Rosebud Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2011. The Rosebud Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2012. The Rosebud Spring Road appears on the Potters Creek (1971), Warm Springs Hills, (1971) and Prohibition Spring (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2013. The Rosebud Spring Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Rosebud Spring Road pursuant to the County's governmental right and authority.

2014. Witnesses with personal knowledge of the history of the Rosebud Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2015. Currently known reputation in the community is that the Rosebud Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2016. Public motor vehicle use of the Rosebud Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2017. The Rosebud Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2018. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Rosebud Spring Road.

2019. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Rosebud Spring Road on lands owned by the United States as described

herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Sheep Spring Road, 2215

2020. The Sheep Spring Road, a Class D road, is designated as county road number 2215 and SGID road identification number RD020200 and is more or less 3.11 miles long.

2021. Exhibit 162 (attached hereto and incorporated herein) contains certain information pertaining to the Sheep Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2022. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sheep Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 162. The Sheep Spring Road includes the segment of road specifically set forth in Exhibit 162 and as exists on the ground.

Acceptance of the Sheep Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2023. The Sheep Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2024. The Sheep Spring Road appears on the Warm Springs Hills (1971) and Prohibition Spring (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2025. The County confirmed its acceptance of the Sheep Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sheep Spring Road pursuant to the County's governmental right and authority.

2026. Witnesses with personal knowledge of the history of the Sheep Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2027. Currently known reputation in the community is that the Sheep Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2028. Public motor vehicle use of the Sheep Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2029. The Sheep Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2030. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sheep Spring Road.

2031. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sheep Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this

road.

Sheep Spring B Road, 2215B

2032. The Sheep Spring B Road, a Class D road, is designated as county road number 2215B and SGID road identification number RD020201 and is more or less 1.78 miles long.

2033. Exhibit 163 (attached hereto and incorporated herein) contains certain information pertaining to the Sheep Spring B Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2034. In this action, the State and County seek to quiet title to the public highway right-of-way for the Sheep Spring B Road solely as it crosses United States public land as included and specifically described in Exhibit 163. The Sheep Spring B Road includes the segment of road specifically set forth in Exhibit 163 and as exists on the ground.

Acceptance of the Sheep Spring B Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2035. The Sheep Spring B Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2036. The Sheep Spring B Road appears on the Warm Springs Hills (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2037. The Sheep Spring B Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Sheep Spring B Road pursuant to the County's governmental right and authority.

2038. Witnesses with personal knowledge of the history of the Sheep Spring B Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2039. Currently known reputation in the community is that the Sheep Spring B Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2040. Public motor vehicle use of the Sheep Spring B Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2041. The Sheep Spring B Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2042. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Sheep Spring B Road.

2043. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Sheep Spring B Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Warm Springs Hill Road, 2217

2044. The South Warm Springs Hill Road is designated as county road number 2217

and SGID road identification number RD020203 and is more or less 3.83 miles long.

2045. Exhibit 164 (attached hereto and incorporated herein) contains certain information pertaining to the South Warm Springs Hill Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2046. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Warm Springs Hill Road solely as it crosses United States public land as included and specifically described in Exhibit 164. The South Warm Springs Hill Road includes the segment of road specifically set forth in Exhibit 164 and as exists on the ground.

Acceptance of the South Warm Springs Hill Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2047. The South Warm Springs Hill Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2048. The South Warm Springs Hill Road appears on the Warm Springs Hills (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2049. The South Warm Springs Hill Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Warm Springs Hill Road using public funds pursuant to the County's governmental right and authority.

2050. Witnesses with personal knowledge of the history of the South Warm Springs Hill Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a

continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2051. Currently known reputation in the community is that the South Warm Springs Hill Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2052. Public motor vehicle use of the South Warm Springs Hill Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2053. The South Warm Springs Hill Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2054. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Warm Springs Hill Road.

2055. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Warm Springs Hill Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Southwest Mud Basin Road, 2626

2056. The Southwest Mud Basin Road, a Class D road, is designated as county road number 2626 and SGID road identification number RD020297 and is more or less 1.52 miles long.

2057. Exhibit 165 (attached hereto and incorporated herein) contains certain information pertaining to the Southwest Mud Basin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2058. In this action, the State and County seek to quiet title to the public highway right-of-way for the Southwest Mud Basin Road solely as it crosses United States public land as included and specifically described in Exhibit 165. The Southwest Mud Basin Road includes the segment of road specifically set forth in Exhibit 165 and as exists on the ground.

Acceptance of the Southwest Mud Basin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2059. The Southwest Mud Basin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2060. The Southwest Mud Basin Road appears on the Luclin NE (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2061. The Southwest Mud Basin Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Southwest Mud Basin Road pursuant to the County's governmental right and authority.

2062. Witnesses with personal knowledge of the history of the Southwest Mud Basin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21,

1976.

2063. Currently known reputation in the community is that the Southwest Mud Basin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2064. Public motor vehicle use of the Southwest Mud Basin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2065. The Southwest Mud Basin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2066. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Southwest Mud Basin Road.

2067. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Southwest Mud Basin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Warm Springs Hill Road, 2218

2068. The Warm Springs Hill Road, a Class D road, is designated as county road number 2218 and SGID road identification number RD020204 and is more or less 3.16 miles long.

2069. Exhibit 166 (attached hereto and incorporated herein) contains certain information

pertaining to the Warm Springs Hill Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2070. In this action, the State and County seek to quiet title to the public highway right-of-way for the Warm Springs Hill Road solely as it crosses United States public land as included and specifically described in Exhibit 166. The Warm Springs Hill Road includes the segment of road specifically set forth in Exhibit 166 and as exists on the ground.

Acceptance of the Warm Springs Hill Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2071. The Warm Springs Hill Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2072. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the Warm Springs Hill Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

2073. The Warm Springs Hill Road appears on the Warm Springs Hills (1971) USGS 7.5 minute map and Yost (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2074. The County confirmed its acceptance of the Warm Springs Hill Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing,

maintaining, and improving the Warm Springs Hill Road pursuant to the County's governmental right and authority.

2075. Witnesses with personal knowledge of the history of the Warm Springs Hill Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2076. Currently known reputation in the community is that the Warm Springs Hill Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2077. Public motor vehicle use of the Warm Springs Hill Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2078. The Warm Springs Hill Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2079. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Warm Springs Hill Road.

2080. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Warm Springs Hill Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

West Mud Basin Road, 2627

2081. The West Mud Basin Road, a Class D road, is designated as county road number 2627 and SGID road identification number RD020298 and is more or less 8.17 miles long.

2082. Exhibit 167 (attached hereto and incorporated herein) contains certain information pertaining to the West Mud Basin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2083. In this action, the State and County seek to quiet title to the public highway right-of-way for the West Mud Basin Road solely as it crosses United States public land as included and specifically described in Exhibit 167. The West Mud Basin Road includes the segment of road specifically set forth in Exhibit 167 and as exists on the ground.

Acceptance of the West Mud Basin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2084. The West Mud Basin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2085. The West Mud Basin Road appears on the Luclin NE (1967) and the Rocky Pass Peak (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2086. The County confirmed its acceptance of the West Mud Basin Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the West Mud Basin Road pursuant to the County's governmental

right and authority.

2087. Witnesses with personal knowledge of the history of the West Mud Basin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2088. Currently known reputation in the community is that the West Mud Basin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2089. Public motor vehicle use of the West Mud Basin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2090. The West Mud Basin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2091. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the West Mud Basin Road.

2092. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the West Mud Basin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

White Clay Road, 2628

2093. The White Clay Road, a Class D road, is designated as county road number 2628 and SGID road identification number RD020299 and is more or less 5.87 miles long.

2094. Exhibit 168 (attached hereto and incorporated herein) contains certain information pertaining to the White Clay Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2095. In this action, the State and County seek to quiet title to the public highway right-of-way for the White Clay Road solely as it crosses United States public land as included and specifically described in Exhibit 168. The White Clay Road includes the segment of road specifically set forth in Exhibit 168 and as exists on the ground.

Acceptance of the White Clay Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2096. The White Clay Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2097. The White Clay Road appears on the Lucin NW (1967), Luclin NE (1967), and the Rocky Pass Peak (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2098. The County confirmed its acceptance of the White Clay Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the White Clay Road pursuant to the County's governmental right

and authority.

2099. Witnesses with personal knowledge of the history of the White Clay Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2100. Currently known reputation in the community is that the White Clay Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2101. Public motor vehicle use of the White Clay Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2102. The White Clay Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2103. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the White Clay Road.

2104. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the White Clay Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2201 Road, 2201

2105. The 2201 Road, a Class D road, is designated as county road number 2201 and SGID road identification number RD020186 and is more or less 5.43 miles long.

2106. Exhibit 169 (attached hereto and incorporated herein) contains certain information pertaining to the 2201 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2107. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2201 Road solely as it crosses United States public land as included and specifically described in Exhibit 169. The 2201 Road includes the segment of road specifically set forth in Exhibit 169 and as exists on the ground.

Acceptance of the 2201 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2108. The 2201 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2109. The 2201 Road appears on the Potters Creek (1971) and Warm Springs Hills (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2110. The County confirmed its acceptance of the 2201 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2201 Road pursuant to the County's governmental right and authority.

2111. Witnesses with personal knowledge of the history of the 2201 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2112. Currently known reputation in the community is that the 2201 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2113. Public motor vehicle use of the 2201 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2114. The 2201 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2115. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2201 Road.

2116. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2201 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2205 Road, 2205

2117. The 2205 Road, a Class D road, is designated as county road number 2205 and SGID road identification number RD020190 and is more or less 1.18 miles long.

2118. Exhibit 170 (attached hereto and incorporated herein) contains certain information

pertaining to the 2205 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2119. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2205 Road solely as it crosses United States public land as included and specifically described in Exhibit 170. The 2205 Road includes the segment of road specifically set forth in Exhibit 170 and as exists on the ground.

Acceptance of the 2205 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2120. The 2205 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2121. Aerial photography from 1987 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 2205 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

2122. The 2205 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2205 Road pursuant to the County's governmental right and authority.

2123. Witnesses with personal knowledge of the history of the 2205 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2124. Currently known reputation in the community is that the 2205 Road has been

open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2125. Public motor vehicle use of the 2205 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2126. The 2205 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2127. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2205 Road.

2128. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2205 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2207 Road, 2207

2129. The 2207 Road, a Class D road, is designated as county road number 2207 and SGID road identification number RD020192 and is more or less 1.03 miles long.

2130. Exhibit 171 (attached hereto and incorporated herein) contains certain information pertaining to the 2207 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2131. In this action, the State and County seek to quiet title to the public highway right-

of-way for the 2207 Road solely as it crosses United States public land as included and specifically described in Exhibit 171. The 2207 Road includes the segment of road specifically set forth in Exhibit 171 and as exists on the ground.

Acceptance of the 2207 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2132. The 2207 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2133. 1976 aerial photography confirms the historical use, existence, and acceptance of the right-of-way for the 2207 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

2134. The 2207 Road appears on the Yost (1959) USGS 15 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2135. The County confirmed its acceptance of the 2207 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2207 Road pursuant to the County's governmental right and authority.

2136. Witnesses with personal knowledge of the history of the 2207 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2137. Currently known reputation in the community is that the 2207 Road has been

open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2138. Public motor vehicle use of the 2207 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2139. The 2207 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2140. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2207 Road.

2141. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2207 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2601 Road, 2601

2142. The 2601 Road, a Class D road, is designated as county road number 2601 and SGID road identification number RD020274 and is more or less 1.88 miles long.

2143. Exhibit 172 (attached hereto and incorporated herein) contains certain information pertaining to the 2601 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2144. In this action, the State and County seek to quiet title to the public highway right-

of-way for the 2601 Road solely as it crosses United States public land as included and specifically described in Exhibit 172. The 2601 Road includes the segment of road specifically set forth in Exhibit 172 and as exists on the ground.

Acceptance of the 2601 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2145. The 2601 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2146. The 2601 Road appears on the Rocky Pass Peak (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2147. The County confirmed its acceptance of the 2601 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2601 Road pursuant to the County's governmental right and authority.

2148. Witnesses with personal knowledge of the history of the 2601 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2149. Currently known reputation in the community is that the 2601 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2150. Public motor vehicle use of the 2601 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of

10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2151. The 2601 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2152. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2601 Road.

2153. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2601 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2602 Road, 2602

2154. The 2602 Road, a Class D road, is designated as county road number 2602 and SGID road identification number RD020275 and is more or less 3.05 miles long.

2155. Exhibit 173 (attached hereto and incorporated herein) contains certain information pertaining to the 2602 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2156. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2602 Road solely as it crosses United States public land as included and specifically described in Exhibit 173. The 2602 Road includes the segment of road specifically set forth in Exhibit 173 and as exists on the ground.

Acceptance of the 2602 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2157. The 2602 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2158. The 2602 Road appears on the Rocky Pass Peak (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2159. The County confirmed its acceptance of the 2602 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2602 Road pursuant to the County's governmental right and authority.

2160. Witnesses with personal knowledge of the history of the 2602 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2161. Currently known reputation in the community is that the 2602 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2162. Public motor vehicle use of the 2602 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2163. The 2602 Road traverses a valid and perfected R.S. 2477 public highway right-of-

way as described herein.

2164. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2602 Road.

2165. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2602 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2603 Road, 2603

2166. The 2603 Road, a Class D road, is designated as county road number 2603 and SGID road identification number RD020276 and is more or less 6.30 miles long.

2167. Exhibit 174 (attached hereto and incorporated herein) contains certain information pertaining to the 2603 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2168. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2603 Road solely as it crosses United States public land as included and specifically described in Exhibit 174. The 2603 Road includes the segment of road specifically set forth in Exhibit 174 and as exists on the ground.

Acceptance of the 2603 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2169. The 2603 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2170. The 2603 Road appears on the Toms Cabin Spring (1971)and the Rocky Pass

Peak (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2171. The County confirmed its acceptance of the 2603 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2603 Road pursuant to the County's governmental right and authority.

2172. Witnesses with personal knowledge of the history of the 2603 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2173. Currently known reputation in the community is that the 2603 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2174. Public motor vehicle use of the 2603 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2175. The 2603 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2176. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the 2603 Road.

2177. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2603 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2604 Road, 2604

2178. The 2604 Road, a Class D road, is designated as county road number 2604 and SGID road identification number RD020277 and is more or less 4.16 miles long.

2179. Exhibit 175 (attached hereto and incorporated herein) contains certain information pertaining to the 2604 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2180. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2604 Road solely as it crosses United States public land as included and specifically described in Exhibit 175. The 2604 Road includes the segment of road specifically set forth in Exhibit 175 and as exists on the ground.

Acceptance of the 2604 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2181. The 2604 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2182. The 2604 Road appears on the Emigrant Pass (1971) and Prohibition Spring (1971) USGS 7.5 quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2183. The 2604 Road was accepted as a County highway at least 10 years prior to

October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2604 Road pursuant to the County's governmental right and authority.

2184. Witnesses with personal knowledge of the history of the 2604 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2185. Currently known reputation in the community is that the 2604 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2186. Public motor vehicle use of the 2604 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2187. The 2604 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2188. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2604 Road.

2189. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2604 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2607 Road, 2607

2190. The 2607 Road, a Class D road, is designated as county road number 2607 and SGID road identification number RD020279 and is more or less 1.70 miles long.

2191. Exhibit 176 (attached hereto and incorporated herein) contains certain information pertaining to the 2607 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2192. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2607 Road solely as it crosses United States public land as included and specifically described in Exhibit 176. The 2607 Road includes the segment of road specifically set forth in Exhibit 176 and as exists on the ground.

Acceptance of the 2607 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2193. The 2607 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2194. The 2607 Road appears on the Emigrant Pass (1971) USGS 7.5 quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2195. The 2607 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2607 Road pursuant to the County's governmental right and authority.

2196. Witnesses with personal knowledge of the history of the 2607 Road confirm

public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2197. Currently known reputation in the community is that the 2607 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2198. Public motor vehicle use of the 2607 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2199. The 2607 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2200. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2607 Road.

2201. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2607 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2609 Road, 2609

2202. The 2609 Road, a Class D road, is designated as county road number 2609 and SGID road identification number RD020281 and is more or less 0.74 miles long.

2203. Exhibit 177 (attached hereto and incorporated herein) contains certain information pertaining to the 2609 Road including: a map depicting the road; township, range and section

references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2204. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2609 Road solely as it crosses United States public land as included and specifically described in Exhibit 177. The 2609 Road includes the segment of road specifically set forth in Exhibit 177 and as exists on the ground.

Acceptance of the 2609 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2205. The 2609 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2206. The 2609 Road appears on the Potters Creek (1971) USGS 7.5 quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2207. The County confirmed its acceptance of the 2609 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2609 Road pursuant to the County's governmental right and authority.

2208. Witnesses with personal knowledge of the history of the 2609 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2209. Currently known reputation in the community is that the 2609 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10

years prior to October 21, 1976, and continuing to the present.

2210. Public motor vehicle use of the 2609 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2211. The 2609 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2212. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2609 Road.

2213. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2609 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

EIGHTH CAUSE OF ACTION – QUIET TITLE
PATTERSON PASS AREA

2214. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

2215. The Patterson Pass Area is located in southwestern Box Elder County in the northwestern region of Utah.

2216. The Patterson Pass Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Patterson Pass Loop Road, 58; (2) Silver Island Road, 68; (3) Crater Island Road, 2716; (4) Tunnel Springs Road, 2722; (5) West Crater Island Road, 2723; (6) 143 Road, 2713; (7) 2701 Road, 2701; (8) 2703 Road, 2703.

2217. Each right-of-way claimed in the Patterson Pass Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

2218. All rights-of-way claimed in the Patterson Pass Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

2219. All rights-of-way claimed in the Patterson Pass Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

2220. Prior to October 21, 1976, the State of Utah, Box Elder, and the public through continuous use accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Patterson Pass Loop Road, 58

2221. The Patterson Pass Loop Road, a Class B road, is designated as county road number 58 and SGID road identification number RD020115 and is more or less 9.28 miles long.

2222. Exhibit 178 (attached hereto and incorporated herein) contains certain information pertaining to the Patterson Pass Loop Road including: a map depicting the road; township,

range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2223. In this action, the State and County seek to quiet title to the public highway right-of-way for the Patterson Pass Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 178. The Patterson Pass Loop Road includes the segment of road specifically set forth in Exhibit 178 and as exists on the ground.

Acceptance of the Patterson Pass Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2224. The Patterson Pass Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2225. The Patterson Pass Loop Road appears on the Lucin (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2226. The County confirmed its acceptance of the Patterson Pass Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Patterson Pass Loop Road using public funds pursuant to the County's governmental right and authority.

2227. Witnesses with personal knowledge of the history of the Patterson Pass Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2228. Currently known reputation in the community is that the Patterson Pass Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2229. Public motor vehicle use of the Patterson Pass Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2230. The Patterson Pass Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2231. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Patterson Pass Loop Road.

2232. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Patterson Pass Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Silver Island Road, 68

2233. The Silver Island Road, a Class B road, is designated as county road number 68 and SGID road identification number RD020127 and is more or less 4.95 miles long.

2234. Exhibit 179 (attached hereto and incorporated herein) contains certain information pertaining to the Silver Island Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

2235. In this action, the State and County seek to quiet title to the public highway right-of-way for the Silver Island Road solely as it crosses United States public land as included and specifically described in Exhibit 179. The Silver Island Road includes the segment of road specifically set forth in Exhibit 179 and as exists on the ground.

Acceptance of the Silver Island Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2236. The Silver Island Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2237. The Silver Island Road appears on the Crater Island (1970) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2238. The County confirmed its acceptance of the Silver Island Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Silver Island Road using public funds pursuant to the County's governmental right and authority.

2239. Witnesses with personal knowledge of the history of the Silver Island Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2240. Currently known reputation in the community is that the Silver Island Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

2241. Public motor vehicle use of the Silver Island Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2242. The Silver Island Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2243. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Silver Island Road.

2244. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Silver Island Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Crater Island Road, 2716

2245. The Crater Island Road, a Class D road, is designated as county road number 2716 and SGID road identification number RD020313 and is more or less 9.33 miles long.

2246. Exhibit 180 (attached hereto and incorporated herein) contains certain information pertaining to the Crater Island Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2247. In this action, the State and County seek to quiet title to the public highway right-

of-way for the Crater Island Road solely as it crosses United States public land as included and specifically described in Exhibit 180. The Crater Island Road includes the segment of road specifically set forth in Exhibit 180 and as exists on the ground.

Acceptance of the Crater Island Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2248. The Crater Island Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2249. The Crater Island Road appears on the Crater Island (1970) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2250. The Crater Island Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Crater Island Road pursuant to the County's governmental right and authority.

2251. Witnesses with personal knowledge of the history of the Crater Island Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2252. Currently known reputation in the community is that the Crater Island Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2253. Public motor vehicle use of the Crater Island Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for

a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2254. The Crater Island Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2255. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Crater Island.

2256. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Crater Island Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Tunnel Springs Road, 2722

2257. The Tunnel Springs Road, a Class D road, is designated as county road number 2722 and SGID road identification number RD020319 and is more or less 5.78 miles long.

2258. Exhibit 181(attached hereto and incorporated herein) contains certain information pertaining to the Tunnel Springs Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2259. In this action, the State and County seek to quiet title to the public highway right-of-way for the Tunnel Springs Road solely as it crosses United States public land as included and specifically described in Exhibit 181. The Tunnel Springs Road includes the segment of road specifically set forth in Exhibit 181and as exists on the ground.

Acceptance of the Tunnel Springs Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2260. The Tunnel Springs Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2261. Aerial photography from 1978 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Tunnel Springs Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

2262. The Tunnel Springs Road appears on the Tecoma (1967), Lucin (1967) and Crater Island NW (1967) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2263. The County confirmed its acceptance of the Tunnel Springs Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Tunnel Springs Road pursuant to the County's governmental right and authority.

2264. Witnesses with personal knowledge of the history of the Tunnel Springs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2265. Currently known reputation in the community is that the Tunnel Springs Road has been open for all to come and go as they please, whenever convenient or necessary, for more

than 10 years prior to October 21, 1976, and continuing to the present.

2266. Public motor vehicle use of the Tunnel Springs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2267. The Tunnel Springs Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2268. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Tunnel Springs Road.

2269. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Tunnel Springs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

West Crater Island Road, 2723

2270. The West Crater Island Road, a Class D road, is designated as county road number 2723 and SGID road identification number RD020320 and is more or less 1.60 miles long.

2271. Exhibit 182(attached hereto and incorporated herein) contains certain information pertaining to the West Crater Island Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2272. In this action, the State and County seek to quiet title to the public highway right-of-way for the West Crater Island Road solely as it crosses United States public land as included and specifically described in Exhibit 182. The West Crater Island Road includes the segment of road specifically set forth in Exhibit 182and as exists on the ground.

Acceptance of the West Crater Island Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2273. The West Crater Island Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2274. The West Crater Island Road appears on the Crater Island (1970) 7.5 minute quadrangle map, which evidences the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2275. The County confirmed its acceptance of the West Crater Island Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the West Island Crater Road pursuant to the County's governmental right and authority.

2276. Witnesses with personal knowledge of the history of the West Crater Island Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2277. Currently known reputation in the community is that the West Crater Island Road has been open for all to come and go as they please, whenever convenient or necessary, for

more than 10 years prior to October 21, 1976, and continuing to the present.

2278. Public motor vehicle use of the West Crater Island Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2279. The West Crater Island Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2280. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the West Crater Island Road.

2281. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the West Crater Island Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

143 Road, 2713

2282. The 143 Road, a Class D road, is designated as county road number 2713 and SGID road identification number RD020310 and is more or less 3.00 miles long.

2283. Exhibit 183 (attached hereto and incorporated herein) contains certain information pertaining to the 143 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2284. In this action, the State and County seek to quiet title to the public highway right-

of-way for the 143 Road solely as it crosses United States public land as included and specifically described in Exhibit 183. The 143 Road includes the segment of road specifically set forth in Exhibit 183 and as exists on the ground.

Acceptance of the 143 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2285. The 143 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2286. The 143 Road appears on the Patterson Pass (1967) and Tecoma (1967 and 1976-I) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2287. The County confirmed its acceptance of the 143 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 143 Road pursuant to the County's governmental right and authority.

2288. Witnesses with personal knowledge of the history of the 143 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2289. Currently known reputation in the community is that the 143 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2290. Public motor vehicle use of the 143 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period

of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2291. The 143 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2292. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 143 Road.

2293. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 143 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2701 Road, 2701

2294. The 2701 Road, a Class D road, is designated as county road number 2701 and SGID road identification number RD020300 and is more or less 4.02 miles long.

2295. Exhibit 184 (attached hereto and incorporated herein) contains certain information pertaining to the 2701 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2296. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2701 Road solely as it crosses United States public land as included and specifically described in Exhibit 184. The 2701 Road includes the segment of road specifically set forth in Exhibit 184 and as exists on the ground.

Acceptance of the 2701 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2297. The 2701 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2298. The 2701 Road appears on the Pilot Peak (1967) and Crater Island (1967) USGS 7.5 minute maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2299. The County confirmed its acceptance of the 2701 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2701 Road pursuant to the County's governmental right and authority.

2300. Witnesses with personal knowledge of the history of the 2701 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2301. Currently known reputation in the community is that the 2701 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2302. Public motor vehicle use of the 2701 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2303. The 2701 Road traverses a valid and perfected R.S. 2477 public highway right-of-

way as described herein.

2304. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2701 Road.

2305. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2701 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2703 Road, 2703

2306. The 2703 Road, a Class D road, is designated as county road number 2703 and SGID road identification number RD020302 and is more or less 1.27 miles long.

2307. Exhibit 185 (attached hereto and incorporated herein) contains certain information pertaining to the 2703 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2308. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2703 Road solely as it crosses United States public land as included and specifically described in Exhibit 185. The 2703 Road includes the segment of road specifically set forth in Exhibit 185 and as exists on the ground.

Acceptance of the 2703 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2309. The 2703 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2310. The 2703 Road appears on the Crater Island NW (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2311. The County confirmed its acceptance of the 2703 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2703 Road pursuant to the County's governmental right and authority.

2312. Witnesses with personal knowledge of the history of the 2703 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2313. Currently known reputation in the community is that the 2703 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2314. Public motor vehicle use of the 2703 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2315. The 2703 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2316. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the 2703 Road.

2317. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2703 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

NINTH CAUSE OF ACTION – QUIET TITLE
RABBIT SPRINGS AREA

2318. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

2319. The Rabbit Springs Area is located in west central Box Elder County in the northwestern region of Utah.

2320. The Rabbit Springs Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Rabbit Springs Loop Road, 59; (2) Little Pigeon Road, 65; (3) Lucin Airport Road, 62; (4) Owl Spring Road, 60; (5) South Rabbit Springs Road, 61; (6) Pigeon Mountain Road, 2719; (7) West Little Pigeon Road, 2724; and (8) 2711 Road, 2711.

2321. Each right-of-way claimed in the Rabbit Springs Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

2322. All rights-of-way claimed in the Rabbit Springs Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public

and the road and also prevent undue degradation of the adjacent land.

2323. All rights-of-way claimed in the Rabbit Springs Area include a minimum right-of-way width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

2324. Prior to October 21, 1976, the State of Utah, Box Elder County, and the public through continuous use accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Rabbit Springs Loop Road, 59

2325. The Rabbit Springs Loop Road, a Class B road, is designated as county road number 59 and SGID road identification number RD020117 and is more or less 4.59 miles long.

2326. Exhibit 186 (attached hereto and incorporated herein) contains certain information pertaining to the Rabbit Springs Loop Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2327. In this action, the State and County seek to quiet title to the public highway right-of-way for the Rabbit Springs Loop Road solely as it crosses United States public land as included and specifically described in Exhibit 186. The Rabbit Springs Loop Road includes the segment of road specifically set forth in Exhibit 186 and as exists on the ground.

Acceptance of the Rabbit Springs Loop Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2328. The Rabbit Springs Loop Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2329. The Rabbit Springs Loop Road appears on the Lucin NW (1967) and Luclin NE (1967) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2330. The County confirmed its acceptance of the Rabbit Springs Loop Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Rabbit Springs Loop Road using public funds pursuant to the County's governmental right and authority.

2331. Witnesses with personal knowledge of the history of the Rabbit Springs Loop Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2332. Currently known reputation in the community is that the Rabbit Springs Loop Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2333. Public motor vehicle use of the Rabbit Springs Loop Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant

of an R.S. 2477 public highway right-of-way underlying this road.

2334. The Rabbit Springs Loop Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2335. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Rabbit Springs Loop Road.

2336. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Rabbit Springs Loop Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Little Pigeon Road, 65

2337. The Little Pigeon Road, a Class B road, is designated as county road number 65 and SGID road identification number RD020124 and is more or less 14.71 miles long.

2338. Exhibit 187 (attached hereto and incorporated herein) contains certain information pertaining to the Little Pigeon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2339. In this action, the State and County seek to quiet title to the public highway right-of-way for the Little Pigeon Road solely as it crosses United States public land as included and specifically described in Exhibit 187. The Little Pigeon Road includes the segment of road specifically set forth in Exhibit 187 and as exists on the ground.

Acceptance of the Little Pigeon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2340. The Little Pigeon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2341. The Little Pigeon Road appears on the Lucin (1967) and Pigeon Mountain (1967) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2342. The County confirmed its acceptance of the Little Pigeon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Little Pigeon Road using public funds pursuant to the County's governmental right and authority.

2343. Witnesses with personal knowledge of the history of the Little Pigeon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2344. Currently known reputation in the community is that the Little Pigeon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2345. Public motor vehicle use of the Little Pigeon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2346. The Little Pigeon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2347. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Little Pigeon Road.

2348. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Little Pigeon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Lucin Airport Road, 62

2349. The Lucin Airport Road, a Class B road, is designated as county road number 62 and SGID road identification number RD020121 and is more or less 1.60 miles long.

2350. Exhibit 188 (attached hereto and incorporated herein) contains certain information pertaining to the Lucin Airport Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2351. In this action, the State and County seek to quiet title to the public highway right-of-way for the Lucin Airport Road solely as it crosses United States public land as included and specifically described in Exhibit 188. The Lucin Airport Road includes the segment of road specifically set forth in Exhibit 188 and as exists on the ground.

Acceptance of the Lucin Airport Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2352. The Lucin Airport Road has long served as a public highway providing access to

and across public land. This road serves the public's transportation needs.

2353. The Lucin Airport Road appears on the Pigeon Mountain (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2354. The County confirmed its acceptance of the Lucin Airport Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Lucin Airport Road using public funds pursuant to the County's governmental right and authority.

2355. Witnesses with personal knowledge of the history of the Lucin Airport Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2356. Currently known reputation in the community is that the Lucin Airport Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2357. Public motor vehicle use of the Lucin Airport Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2358. The Lucin Airport Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2359. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Lucin Airport Road.

2360. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Lucin Airport Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Owl Spring Road, 60

2361. The Owl Spring Road, a Class B road, is designated as county road number 60 and SGID road identification number RD020119 and is more or less 1.24 miles long.

2362. Exhibit 189 (attached hereto and incorporated herein) contains certain information pertaining to the Owl Spring Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2363. In this action, the State and County seek to quiet title to the public highway right-of-way for the Owl Spring Road solely as it crosses United States public land as included and specifically described in Exhibit 189. The Owl Spring Road includes the segment of road specifically set forth in Exhibit 189 and as exists on the ground.

Acceptance of the Owl Spring Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2364. The Owl Spring Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2365. The Owl Spring Road appears on the Lucin NW (1967) and Lucin NE (1967)

USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2366. The County confirmed its acceptance of the Owl Spring Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Owl Spring Road using public funds pursuant to the County's governmental right and authority.

2367. Witnesses with personal knowledge of the history of the Owl Spring Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2368. Currently known reputation in the community is that the Owl Spring Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2369. Public motor vehicle use of the Owl Spring Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2370. The Owl Spring Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2371. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the Owl Spring Road.

2372. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Owl Spring Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Rabbit Springs Road, 61

2373. The South Rabbit Springs Road, a Class B road, is designated as county road number 61 and SGID road identification number RD020120 and is more or less 3.90 miles long.

2374. Exhibit 190 (attached hereto and incorporated herein) contains certain information pertaining to the South Rabbit Springs Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2375. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Rabbit Springs Road solely as it crosses United States public land as included and specifically described in Exhibit 190. The South Rabbit Springs Road includes the segment of road specifically set forth in Exhibit 190 and as exists on the ground.

Acceptance of the South Rabbit Springs Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2376. The South Rabbit Springs Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2377. The South Rabbit Springs Road appears on the Lucin (1967), Pigeon Mountain (1967) and Lucin NE (1967) USGS 7.5 minute quadrangle maps, which evidence the existence,

use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2378. The County confirmed its acceptance of the South Rabbit Springs Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Rabbit Springs Road using public funds pursuant to the County's governmental right and authority.

2379. Witnesses with personal knowledge of the history of the South Rabbit Springs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2380. Currently known reputation in the community is that the South Rabbit Springs Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2381. Public motor vehicle use of the South Rabbit Springs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2382. The South Rabbit Springs Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2383. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the South Rabbit Springs Road.

2384. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Rabbit Springs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Pigeon Mountain Road, 2719

2385. The Pigeon Mountain Road, a Class D road, is designated as county road number 2719 and SGID road identification number RD020316 and is more or less 19.81 miles long.

2386. Exhibit 191 (attached hereto and incorporated herein contains certain information pertaining to the Pigeon Mountain Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2387. In this action, the State and County seek to quiet title to the public highway right-of-way for the Pigeon Mountain Road solely as it crosses United States public land as included and specifically described in Exhibit 191. The Pigeon Mountain Road includes the segment of road specifically set forth in Exhibit191 and as exists on the ground.

Acceptance of the Pigeon Mountain Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2388. The Pigeon Mountain Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2389. The Pigeon Mountain Road appears on the Pigeon Mountain (1967) and Lucin (1967) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance

of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2390. The County confirmed its acceptance of the Pigeon Mountain Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Pigeon Mountain Road pursuant to the County's governmental right and authority.

2391. Witnesses with personal knowledge of the history of the Pigeon Mountain Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2392. Currently known reputation in the community is that the Pigeon Mountain Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2393. Public motor vehicle use of the Pigeon Mountain Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2394. The Pigeon Mountain Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2395. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Pigeon Mountain Road.

2396. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Pigeon Mountain Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

West Little Pigeon Road, 2724

2397. The West Little Pigeon Road, a Class D road, is designated as county road number 2724 and SGID road identification number RD020321 and is more or less 6.98 miles long.

2398. Exhibit 192 (attached hereto and incorporated herein contains certain information pertaining to the West Little Pigeon Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2399. In this action, the State and County seek to quiet title to the public highway right-of-way for the West Little Pigeon Road solely as it crosses United States public land as included and specifically described in Exhibit 192. The West Little Pigeon Road includes the segment of road specifically set forth in Exhibit 192 and as exists on the ground.

Acceptance of the West Little Pigeon Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2400. The West Little Pigeon Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2401. The West Little Pigeon Road appears on the Pigeon Mountain (1967) and Lemay Island (1967) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and

acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2402. The County confirmed its acceptance of the West Little Pigeon Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the West Little Pigeon Road pursuant to the County's governmental right and authority.

2403. Witnesses with personal knowledge of the history of the West Little Pigeon Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2404. Currently known reputation in the community is that the West Little Pigeon Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2405. Public motor vehicle use of the West Little Pigeon Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2406. The West Little Pigeon Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2407. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title

action to establish clear title to the right-of-way underlying the West Little Pigeon Road.

2408. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the West Little Pigeon Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2711 Road, 2711

2409. The 2711 Road, a Class D road, is designated as county road number 2711 and SGID road identification number RD020308 and is more or less 1.02 miles long.

2410. Exhibit193 (attached hereto and incorporated herein) contains certain information pertaining to the 2711 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2411. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2711 Road solely as it crosses United States public land as included and specifically described in Exhibit 193. The 2711 Road includes the segment of road specifically set forth in Exhibit193 and as exists on the ground.

Acceptance of the 2711 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2412. The 2711 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2413. The 2711 Road appears on the Lemay Island (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2414. The 2711 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2711 Road pursuant to the County's governmental right and authority.

2415. Witnesses with personal knowledge of the history of the 2711 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2416. Currently known reputation in the community is that the 2711 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2417. Public motor vehicle use of the 2711 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2418. The 2711 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2419. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2711 Road.

2420. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2711 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this

road.

TENTH CAUSE OF ACTION – QUIET TITLE
TECOMA AREA

2421. Plaintiffs reallege and incorporate herein each of the foregoing paragraphs.

2422. The Tecoma Area is located in southwestern Box Elder County in the northwestern region of Utah.

2423. The Tecoma Area includes the following roads—listed by Common Road Name and County Unique Number: (1) Tecoma Road, 56; (2) Coal Bank Springs Road, 2715; (3) Kilgore Basin Road, 2424; (4) South Tom Cabin Road, 2435; (5) Southwest Winter Cabin Road, 2431; (6) South Winter Cabin Road, 2432; (7) Tom Cabin Road, 2437; (8) Tower Road, 2721; (9) Winter Cabin Road, 2440; (10) 50 Road, 2411; (11) 2402 Road, 2402; (12) 2403 Road, 2403; (13) 2404 Road, 2404; (14) 2705 Road, 2705; and (15) 2708 Road, 2708.

2424. Each right-of-way claimed in the Tecoma Area was used by the general public who engaged in one or more of the following activities: cattle ranching, sheep herding, prospecting for minerals, rock hounding, mining, oil and gas exploration, wood gathering, cutting wood, collecting pine nuts or berries, recreation, hunting, trapping, government access, traveling in and through the area, or any other legitimate purpose.

2425. All rights-of-way claimed in the Tecoma Area are sufficient in scope for general motor vehicle travel and include that which is reasonable and necessary to meet the exigencies of motor vehicle travel according to safe engineering practices that protect the public and the road and also prevent undue degradation of the adjacent land.

2426. All rights-of-way claimed in the Tecoma Area include a minimum right-of-way

width of 66 feet or greater width as determined at trial, along with cuts, fills, slopes, water bars, and such features and facilities as have historically been acknowledged by the DOI and under law as being reasonable and necessary for the use, benefit, and enjoyment of public highway rights-of-way. *See, e.g.,* UTAH CODE ANN. § 72-5-302(4)(b) (2003).

2427. Prior to October 21, 1976, the State of Utah, Box Elder County, and the public through continuous use accepted the congressional grant of an R.S. 2477 right-of-way for the entire length and course of all roads as described herein, on public lands owned by the United States.

Tecoma Road, 56

2428. The Tecoma Road, a Class B road, is designated as county road number 56 and SGID road identification number RD020112 and is more or less 7.60 miles long.

2429. Exhibit 194 (attached hereto and incorporated herein) contains certain information pertaining to the Tecoma Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2430. In this action, the State and County seek to quiet title to the public highway right-of-way for the Tecoma Road solely as it crosses United States public land as included and specifically described in Exhibit 194. The Tecoma Road includes the segment of road specifically set forth in Exhibit 194 and as exists on the ground.

Acceptance of the Tecoma Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2431. The Tecoma Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2432. Aerial photography from 1987 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Tecoma Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976

2433. The Tecoma Road appears on the Lucin (1967) and Tecoma (1967) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2434. The County confirmed its acceptance of the Tecoma Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Tecoma Road using public funds pursuant to the County's governmental right and authority.

2435. Witnesses with personal knowledge of the history of the Tecoma Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2436. Currently known reputation in the community is that the Tecoma Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2437. Public motor vehicle use of the Tecoma Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2438. The Tecoma Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2439. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Tecoma Road.

2440. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Tecoma Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Coal Bank Springs Road, 2715

2441. The Coal Bank Springs Road also known as Salt Road, a Class D road, is designated as county road number 2715 and SGID road identification number RD020312 and is more or less 6.16 miles long.

2442. Exhibit 195 (attached hereto and incorporated herein) contains certain information pertaining to the Coal Bank Springs Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2443. In this action, the State and County seek to quiet title to the public highway right-of-way for the Coal Bank Springs Road solely as it crosses United States public land as included and specifically described in Exhibit 195. The Coal Bank Springs Road includes the segment of road specifically set forth in Exhibit 195 and as exists on the ground.

Acceptance of the Coal Bank Springs Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2444. The Coal Bank Springs Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2445. The Coal Bank Springs Road appears on the Lucin (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2446. The County confirmed its acceptance of the Coal Bank Springs Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Coal Bank Springs Road pursuant to the County's governmental right and authority.

2447. Witnesses with personal knowledge of the history of the Coal Bank Springs Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2448. Currently known reputation in the community is that the Coal Bank Springs Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2449. Public motor vehicle use of the Coal Bank Springs Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477

public highway right-of-way underlying this road.

2450. The Coal Bank Springs Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2451. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Salt Road.

2452. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Coal Bank Springs Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Kilgore Basin Road, 2424

2453. The Kilgore Basin Road, a Class D road, is designated as county road number 2424 and SGID road identification number RD020231and is more or less 6.65 miles long.

2454. Exhibit 196 (attached hereto and incorporated herein) contains certain information pertaining to the Kilgore Basin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2455. In this action, the State and County seek to quiet title to the public highway right-of-way for the Kilgore Basin Road solely as it crosses United States public land as included and specifically described in Exhibit 196. The Kilgore Basin Road includes the segment of road specifically set forth in Exhibit 196 and as exists on the ground.

Acceptance of the Kilgore Basin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2456. The Kilgore Basin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2457. Aerial photography from 1978, or earlier, confirms the historical use, existence, and acceptance of the right-of-way for the Kilgore Basin Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

2458. The Kilgore Basin Road appears on the Lucin NW (1967) and Jackson Spring (1967) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2459. The County confirmed its acceptance of the Kilgore Basin Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Kilgore Basin Road pursuant to the County's governmental right and authority.

2460. Witnesses with personal knowledge of the history of the Kilgore Basin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2461. Currently known reputation in the community is that the Kilgore Basin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2462. Public motor vehicle use of the Kilgore Basin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2463. The Kilgore Basin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2464. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Kilgore Basin.

2465. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Kilgore Basin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Tom Cabin Road, 2435

2466. The South Tom Cabin Road, a Class D road, is designated as county road number 2435 and SGID road identification number RD020103 and is more or less 11.72 miles long.

2467. Exhibit 197 (attached hereto and incorporated herein) contains certain information pertaining to the South Tom Cabin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2468. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Tom Cabin Road solely as it crosses United States public land as included

and specifically described in Exhibit 197. The South Tom Cabin Road includes the segment of road specifically set forth in Exhibit 197 and as exists on the ground.

Acceptance of the South Tom Cabin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2469. The South Tom Cabin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2470. Aerial photography from 1978 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the South Tom Cabin Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

2471. The South Tom Cabin Road appears on the Tom's Cabin Spring (1971) and Lucin NW (1967) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2472. The County confirmed its acceptance of the South Tom Cabin Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the South Tom Cabin Road pursuant to the County's governmental right and authority.

2473. Witnesses with personal knowledge of the history of the South Tom Cabin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October

21, 1976.

2474. Currently known reputation in the community is that the South Tom Cabin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2475. Public motor vehicle use of the South Tom Cabin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2476. The South Tom Cabin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2477. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Tom Cabin Road.

2478. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Tom Cabin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Southwest Winter Cabin Road, 2431

2479. The Southwest Winter Cabin Road, a Class D road, is designated as county road number 2431and SGID road identification number RD020238 and is more or less 4.48 miles long.

2480. Exhibit 198 (attached hereto and incorporated herein) contains certain information

pertaining to the Southwest Winter Cabin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2481. In this action, the State and County seek to quiet title to the public highway right-of-way for the Southwest Winter Cabin Road solely as it crosses United States public land as included and specifically described in Exhibit 198. The Southwest Winter Cabin Road includes the segment of road specifically set forth in Exhibit 198 and as exists on the ground.

Acceptance of the Southwest Winter Cabin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2482. The Southwest Winter Cabin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2483. Aerial photography from 1978 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Southwest Winter Cabin Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

2484. The Southwest Winter Cabin Road appears on the Lucin NW (1967) and Jackson Spring (1967) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2485. The County confirmed its acceptance of the Southwest Winter Cabin Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the Southwest Winter Cabin Road pursuant to the County's governmental right and authority.

2486. Witnesses with personal knowledge of the history of the Southwest Winter Cabin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2487. Currently known reputation in the community is that the Southwest Winter Cabin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2488. Public motor vehicle use of the Southwest Winter Cabin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2489. The Southwest Winter Cabin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2490. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Southwest Winter Cabin Road.

2491. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Southwest Winter Cabin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

South Winter Cabin Road, 2432

2492. The South Winter Cabin Road, a Class D road, is designated as county road number 2432 and SGID road identification number RD020239 and is more or less 3.85 miles long.

2493. Exhibit 199 (attached hereto and incorporated herein) contains certain information pertaining to the South Winter Cabin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2494. In this action, the State and County seek to quiet title to the public highway right-of-way for the South Winter Cabin Road solely as it crosses United States public land as included and specifically described in Exhibit 199. The South Winter Cabin Road includes the segment of road specifically set forth in Exhibit 199 and as exists on the ground.

Acceptance of the South Winter Cabin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2495. The South Winter Cabin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2496. The South Winter Cabin Road appears on the Lucin NW (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2497. The County confirmed its acceptance of the South Winter Cabin Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by

managing, maintaining, and improving the South Winter Cabin Road pursuant to the County's governmental right and authority.

2498. Witnesses with personal knowledge of the history of the South Winter Cabin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2499. Currently known reputation in the community is that the South Winter Cabin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2500. Public motor vehicle use of the South Winter Cabin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2501. The South Winter Cabin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2502. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the South Winter Cabin Road.

2503. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the South Winter Cabin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Tom Cabin Road, 2437

2504. The Tom Cabin Road, a Class D road, is designated as county road number 2437 and SGID road identification number RD020245 and is more or less 8.37 miles long.

2505. Exhibit 200 (attached hereto and incorporated herein) contains certain information pertaining to the Tom Cabin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2506. In this action, the State and County seek to quiet title to the public highway right-of-way for the Tom Cabin Road solely as it crosses United States public land as included and specifically described in Exhibit 200. The Tom Cabin Road includes the segment of road specifically set forth in Exhibit 200 and as exists on the ground.

Acceptance of the Tom Cabin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2507. The Tom Cabin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2508. Aerial photography from 1976 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Tom Cabin Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

2509. The Tom Cabin Road appears on the Tom's Cabin Spring (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2510. The County confirmed its acceptance of the Tom Cabin Road by 1975, when it

designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Tom Cabin Road pursuant to the County's governmental right and authority.

2511. Witnesses with personal knowledge of the history of the Tom Cabin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2512. Currently known reputation in the community is that the Tom Cabin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2513. Public motor vehicle use of the Tom Cabin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2514. The Tom Cabin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2515. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Tom Cabin Road.

2516. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Tom Cabin Road on lands owned by the United States as described herein

and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Tower Road, 2721

2517. The Tower Road, a Class D road, is designated as county road number 2721 and SGID road identification number RD020318 and is more or less 5.81 miles long.

2518. Exhibit201 (attached hereto and incorporated herein) contains certain information pertaining to the Tower Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2519. In this action, the State and County seek to quiet title to the public highway right-of-way for the Tower Road solely as it crosses United States public land as included and specifically described in Exhibit 201. The Tower Road includes the segment of road specifically set forth in Exhibit 201 and as exists on the ground.

Acceptance of the Tower Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2520. The Tower Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2521. Aerial photography from 1987 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the Tower Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

2522. The Tower Road appears on the Tecoma (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this

road. See Exhibit 12 or more detailed map information.

2523. The County confirmed its acceptance of the Tower Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Tower Road pursuant to the County's governmental right and authority.

2524. Witnesses with personal knowledge of the history of the Tower Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2525. Currently known reputation in the community is that the Tower Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2526. Public motor vehicle use of the Tower Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2527. The Tower Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2528. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Tower Road.

2529. The State and County are entitled to an order quieting title to their R.S. 2477

right-of-way for the Tower Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

Winter Cabin Road, 2440

2530. The Winter Cabin Road, a Class D road, is designated as county road number 2440 and SGID road identification number RD020248 and is more or less 8.13 miles long.

2531. Exhibit 202 (attached hereto and incorporated herein) contains certain information pertaining to the Winter Cabin Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2532. In this action, the State and County seek to quiet title to the public highway right-of-way for the Winter Cabin Road solely as it crosses United States public land as included and specifically described in Exhibit 202. The Winter Cabin Road includes the segment of road specifically set forth in Exhibit 202 and as exists on the ground.

Acceptance of the Winter Cabin Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2533. The Winter Cabin Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2534. The Winter Cabin Road appears on the Lucin NW (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2535. The County confirmed its acceptance of the Winter Cabin Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map.

The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the Winter Cabin Road pursuant to the County's governmental right and authority.

2536. Witnesses with personal knowledge of the history of the Winter Cabin Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2537. Currently known reputation in the community is that the Winter Cabin Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2538. Public motor vehicle use of the Winter Cabin Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2539. The Winter Cabin Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2540. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the Winter Cabin Road.

2541. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the Winter Cabin Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment

of this road.

50 Road, 2411

2542. The 50 Road, a Class D road, is designated as county road number 2411 and SGID road identification number RD020102 and is more or less 2.83 miles long.

2543. Exhibit203 (attached hereto and incorporated herein) contains certain information pertaining to the 50 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2544. In this action, the State and County seek to quiet title to the public highway right-of-way for the 50 Road solely as it crosses United States public land as included and specifically described in Exhibit 203. The 50 Road includes the segment of road specifically set forth in Exhibit203 and as exists on the ground.

Acceptance of the 50 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2545. The 50 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2546. The 50 Road appears on the Tom Cabin Spring (1971) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2547. The County confirmed its acceptance of the 50 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 50 Road pursuant to the County's governmental right and authority.

2548. Witnesses with personal knowledge of the history of the 50 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2549. Currently known reputation in the community is that the 50 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2550. Public motor vehicle use of the 50 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2551. The 50 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2552. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 50 Road.

2553. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 50 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2402 Road, 2402

2554. The 2402 Road, a Class D road, is designated as county road number 2402 and SGID road identification number RD020213 and is more or less 2.05 miles long.

2555. Exhibit204 (attached hereto and incorporated herein) contains certain information pertaining to the 2402 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2556. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2402 Road solely as it crosses United States public land as included and specifically described in Exhibit 204. The 2402 Road includes the segment of road specifically set forth in Exhibit204 and as exists on the ground.

Acceptance of the 2402 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2557. The 2402 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2558. The 2402 Road appears on the Lucin NW (1967) and Toms Cabin Spring (1971) USGS 7.5 minute quadrangle maps, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2559. The County confirmed its acceptance of the 2402 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2402 Road pursuant to the County's governmental right and authority.

2560. Witnesses with personal knowledge of the history of the 2402 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2561. Currently known reputation in the community is that the 2402 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2562. Public motor vehicle use of the 2402 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2563. The 2402 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2564. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2402 Road.

2565. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2402 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2403 Road, 2403

2566. The 2403 Road, a Class D road, is designated as county road number 2403 and SGID road identification number RD020214 and is more or less 2.90 miles long.

2567. Exhibit 205(attached hereto and incorporated herein) contains certain information pertaining to the 2403 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a

complete centerline description of the road.

2568. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2403 Road solely as it crosses United States public land as included and specifically described in Exhibit 205. The 2403 Road includes the segment of road specifically set forth in Exhibit 205 and as exists on the ground.

Acceptance of the 2403 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2569. The 2403 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2570. The 2403 Road appears on the Luncin NW (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2571. The County confirmed its acceptance of the 2403 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2403 Road pursuant to the County's governmental right and authority.

2572. Witnesses with personal knowledge of the history of the 2403 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2573. Currently known reputation in the community is that the 2403 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2574. Public motor vehicle use of the 2403 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2575. The 2403 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2576. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2403 Road.

2577. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2403 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2404 Road, 2404

2578. The 2404 Road, a Class D road, is designated as county road number 2404 and SGID road identification number RD020215 and is more or less 2.40 miles long.

2579. Exhibit 206(attached hereto and incorporated herein) contains certain information pertaining to the 2404 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2580. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2404 Road solely as it crosses United States public land as included and

specifically described in Exhibit 206. The 2404 Road includes the segment of road specifically set forth in Exhibit206 and as exists on the ground.

Acceptance of the 2404 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2581. The 2404 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2582. Aerial photography from 1987 or earlier confirms the historical use, existence, and acceptance of the right-of-way for the 2404 Road as a public highway located on the land at issue in this case and following the course described herein. Historic aerial photography continues to show the road as it existed prior to October 21, 1976.

2583. The County confirmed its acceptance of the 2404 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2404 Road pursuant to the County's governmental right and authority.

2584. Witnesses with personal knowledge of the history of the 2404 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2585. Currently known reputation in the community is that the 2404 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2586. Public motor vehicle use of the 2404 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period

of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2587. The 2404 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2588. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2404 Road.

2589. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2404 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2705 Road, 2705

2590. The 2705 Road, a Class D road, is designated as county road number 2705 and SGID road identification number RD020304 and is more or less 1.44 miles long.

2591. Exhibit207 (attached hereto and incorporated herein) contains certain information pertaining to the 2705 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2592. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2705 Road solely as it crosses United States public land as included and specifically described in Exhibit 207. The 2705 Road includes the segment of road specifically set forth in Exhibit 207 and as exists on the ground.

Acceptance of the 2705 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2593. The 2705 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2594. The 2705 Road appears on the Lucin (1967) USGS 7.5 minute quadrangle map, which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2595. The 2705 Road was accepted as a County highway at least 10 years prior to October 21, 1976. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2705 Road pursuant to the County's governmental right and authority.

2596. Witnesses with personal knowledge of the history of the 2705 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2597. Currently known reputation in the community is that the 2705 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2598. Public motor vehicle use of the 2705 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2599. The 2705 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2600. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2705 Road.

2601. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2705 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

2708 Road, 2708

2602. The 2708 Road, a Class D road, is designated as county road number 2708 and SGID road identification number RD020307 and is more or less 1.10 miles long.

2603. Exhibit 208 (attached hereto and incorporated herein) contains certain information pertaining to the 2708 Road including: a map depicting the road; township, range and section references describing the road's physical location; a servient estate ownership list; and a complete centerline description of the road.

2604. In this action, the State and County seek to quiet title to the public highway right-of-way for the 2708 Road solely as it crosses United States public land as included and specifically described in Exhibit 208. The 2708 Road includes the segment of road specifically set forth in Exhibit 208 and as exists on the ground.

Acceptance of the 2708 Road R.S. 2477 Right-of-way Prior to October 21, 1976.

2605. The 2708 Road has long served as a public highway providing access to and across public land. This road serves the public's transportation needs.

2606. The 2708 Road appears on the Lucin (1967) USGS 7.5 minute quadrangle map,

which evidence the existence, use, and acceptance of the right-of-way underlying this road. See Exhibit 12 for more detailed map information.

2607. The County confirmed its acceptance of the 2708 Road by 1975, when it designated and accepted the road as a County highway on the County's general highway map. The County further evidenced its acceptance of its R.S. 2477 right-of-way by managing, maintaining, and improving the 2708 Road pursuant to the County's governmental right and authority.

2608. Witnesses with personal knowledge of the history of the 2708 Road confirm public use of this road as a public thoroughfare by means of motor vehicles on a continuous basis, whenever convenient or necessary, for more than 10 years prior to October 21, 1976.

2609. Currently known reputation in the community is that the 2708 Road has been open for all to come and go as they please, whenever convenient or necessary, for more than 10 years prior to October 21, 1976, and continuing to the present.

2610. Public motor vehicle use of the 2708 Road as a public thoroughfare traversing unreserved public lands on a continuous basis, whenever convenient or necessary, for a period of 10 years prior to October 21, 1976, confirms acceptance of the grant of an R.S. 2477 public highway right-of-way underlying this road.

2611. The 2708 Road traverses a valid and perfected R.S. 2477 public highway right-of-way as described herein.

2612. Without confirmation from the United States, a cloud remains on the State and County's title to the right-of-way. Therefore, the State and County have brought this quiet title action to establish clear title to the right-of-way underlying the 2708 Road.

2613. The State and County are entitled to an order quieting title to their R.S. 2477 right-of-way for the 2708 Road on lands owned by the United States as described herein and including that which is reasonable and necessary for the use, benefit, and enjoyment of this road.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request relief against the Defendant as follows:

1. On its First Cause of Action – Cotton Thomas Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Cotton Thomas Road, 8; (2) Cotton Thomas Basin Road, 8.1; (3), Lynn-Alamo Road, 9; (4) Yost Access Road, 10; (5) Yost Flats Road, 10.1; (6) Yost Flats A Road, 10.2; (7) Junction Valley Cedar Hill Road, 2328; (8) Kimball Creek Road, 2425; (9) Middle Kimball Creek Road, 2426; (10) North Kimball Creek Road; 2427; (11) 2301 Road, 2301; (12) 2302 Road, 2302; (13) 2310 Road, 2310; (14) 2321 Road, 2321; (15) 2325 Road, 2325; and (16) Right Hand Fork of Kimball, 2430;

2. On its Second Cause of Action – Emigrant Trail Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Emigrant Trail Road, 12; (2) Big Pass Connector Road, 142; (3) Big Pass Road, 15; (4) Board Ranch Road, 13; (5) Cedar Hills Road, 101; (6) East Hogup Road, 7; (7) East Red Dome Road, 84; (8) Government Well Road, 124; (9) Hogup Cabin Road, 123; (10) Hogup Loop Road, 125; (11) Middle Pass Road, 17; (12) Middle Road, 129; (13) North End Upper Hogup, 126; (14) North Red Dome Road, 86; (15) North Tower Road, 122; (16) Old Railroad Grade Road, 88; (17) Peplin Pond Road, 118; (18) Red Dome Road, 83; (19) Sheep Camp Road, 128; (20) Southeast

Red Dome Road, 87; (21) Terrace Mountain Road, 90; (22) Upper East Hogup Road, 127; (23) Upper North Finger Road, 130; (24) West Hogup Road, 16; (25) Baker Mountain Road, 2208; (26) Coyote Hill Road, 2509; (27) Crocodile Mountain Spur Road, 2511; (28) Dove Creek Hills Road, 2210; (29) East Matlin Mountain Road, 2512; (30) East Red Dome Road, 2513; (31) Flat Road, 2514; (32) Flat Road, 89; (33) Green Rock Canyon Road, 2211; (34) Hogup Bypass Road, 2515; (35) Indian Cave Access Road, 2516; (36) Lower Hogup Finger Road, 2517; (37) Peplin Mountain Road, 2518; (38) Pugsley Reservoir Road, 2519; (39) Russian Knoll Road, 2214; (40) South Airplane Hill Road, 85; (41) South Coyote Hill Road, 2521; (42) West Loop Pugsley Reservoir Road, 2522; (43) 2202 Road, 2202; (44) 2502 Road, 2502; (45) 2503 Road, 2503; (46) 2504 Road, 2504; (47) 2506 Road, 2506; (48) 2513B Road, 2513B; and (49) 2513C Road, 2513C;

3. On its Third Cause of Action – Etna Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Etna Road, 2; (2) Deans Pass Road, 30; (3) Etna Reservoir Road, 35; (4) Tanner Ranch Road, 45; (5) Death Creek Road, 47; (6) Beaty Springs Road, 2412; (7) Buckskin Spring Road, 2413; (8) Buckskin Spring 2 Road, 2414; (9) Cook Canyon Road, 2415; (10) Death Valley Road, 2418; (11) Deer Camp Road, 2419; (12) Dry Canyon Road, 2420; (13) Dry Canyon 2 Road, 2421; (14) Tanner Ranch Road, 2436; (15) Upper Buckskin Spring Road, 2438; (16) Upper Dry Canyon Road, 2439; (17) 2405 Road, 2405; and (18) 2406 Road, 2406;

4. On its Fourth Cause of Action – Goose Creek Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Goose Creek Road, 1; (2) Hardister Road, 11; (3) Meadow Butte Road, 28; (4) East Hardesty Road, 2422; (5) East

Vipont Road, 2423; (6) Northwest Meadow Creek Road, 2428; (7) Pole Creek Road, 2429; (8) Southeast Hardesty Road, 2433; (9) Southeast Vipont Road, 2434; (10) 2408 Road, 2408; and (11) 2409 Road, 2409;

5. On its Fifth Cause of Action – Kelton Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Kelton Road, 104; (2) Locamotive Springs Loop Road, 117; (3) Old Railroad Grade Road, 12.1; (4) Salt Wells Road, 135; (5) West Wildcat Hills Road, 105; (6) Wildcat Mountain Road, 106; (7) Cedar Hill East Road, 2114; (8) Deep Creek Road, 2115; (9) East Wildcat Road, 2104; (10) North Wildcat Road, 2102; (11) Pilot Spring Road, 2101; (12) Railroad Grade to Wildcat Road, 2116; (13) South Wildcat Road, 2108; (14) South Wildcat Road, 2113; (15) Wildcat Road, 2111; (16) 2105 Road, 2105; (17) 2106 Road, 2106; (18) 2107 Road, 2107; (19) 2109 Road, 2109; (20) 2110 Road, 2110; (21) 2112 Road, 2112; and (22) 2119 Road, 2119;

6. On its Sixth Cause of Action – Lakeside Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Lakeside Road, 19; (2) Railroad to Newfoundland Road, 2805; (3) Railroad to Newfoundland 2 Road, 2806; (4) 2802 Road, 2802; and (5) 2804 Road, 2804;

7. On its Seventh Cause of Action –Mud Basin Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Bedke Spring Road, 43; (2) Emigrant Pass Road, 3; (3) Ingham Pass Road, 6; (4) Keg Springs Road, 5; (5) Mud Basin Road, 73; (6) Muddy Ranch Road, 18; (7) Bypass Road, 2612; (8) Central Warm Springs Hill Road, 2209; (9) Chournos Access Road, 2613; (10) Crystal Mountain Road , 2614; (11) Devils Playground Road, 2615; (12) Ingham Peak Ridge Road, 2617; (13) Mud Basin Road, 2618; (14)

Muddy Creek Road, 2212; (15) North Ridge Road, 2619; (16) Prospect Road, 2620; (17) Prospect 1 Road, 2621; (18) Prospect 2 Road, 2622; (19) Red Butte Road, 2623; (20) Red Butte B Road, 2623B; (21) Rocky Road, 2624; (22) Rocky Pass Ridge Road, 2625; (23) Rosebud Spring Road, 2213; (24) Sheep Spring Road, 2215; (25) Sheep Spring B Road, 2215B; (26) South Warm Springs Hill Road, 2217; (27) Southwest Mud Basin Road, 2626; (28) Warm Springs Hill Road, 2218; (29) West Mud Basin Road, 2627; (30) White Clay Road, 2628; (31) 2201 Road, 2201; (32) 2205 Road, 2205; (33) 2207 Road, 2207; (34) 2601 Road, 2601; (35) 2602 Road, 2602; (36) 2603 Road, 2603; (37) 2604 Road, 2604; (38) 2607 Road, 2607; and (39) 2609 Road, 2609;

8. On its Eighth Cause of Action – Patterson Pass Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Patterson Pass Loop Road, 58; (2) Silver Island Road, 68; (3) Crater Island Road, 2716; (4) Tunnel Springs Road, 2722; (5) West Crater Island Road, 2723; (6) 143 Road, 2713; (7) 2701 Road, 2701; (8) 2703 Road, 2703;

9. On its Ninth Cause of Action – Rabbit Springs Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Rabbit Springs Loop Road, 59; (2) Little Pigeon Road, 65; (3) Lucin Airport Road, 62; (4) Owl Spring Road, 60; (5) South Rabbit Springs Road, 61; (6) Pigeon Mountain Road, 2719; (7) West Little Pigeon Road, 2724; and (8) 2711 Road, 2711;

10. On its Tenth Cause of Action – Tecoma Area, an order quieting title in and to the R.S. 2477 public highway rights-of-way for the following roads: (1) Tecoma Road, 56; (2) Coal Bank Springs Road, 2715; (3) Kilgore Basin Road, 2424; (4) South Tom Cabin Road, 2435; (5)

Southwest Winter Cabin Road, 2431; (6) South Winter Cabin Road, 2432; (7) Tom Cabin Road, 2437; (8) Tower Road, 2721; (9) Winter Cabin Road, 2440; (10) 50 Road, 2411; (11) 2402 Road, 2402; (12) 2403 Road, 2403; (13) 2404 Road, 2404; (14) 2705 Road, 2705; and (15) 2708 Road, 2708;

11. An order awarding costs and fees, specifically including, but not limited to, reasonable attorney fees to the extent permitted by law; and

12. An order granting such further and other relief as may be appropriate.

Respectfully submitted this 24th day of August, 2012.

/s/ Harry Souvall
Assistant Attorney General