

# EXHIBIT 11

TO

MEMORANDUM IN SUPPORT OF MOTION IN LIMINE TO ESTABLISH THE UNITED STATES' LEGAL ENTITLEMENT TO A FEDERAL RESERVED WATER RIGHT AND TO LIMIT THE SCOPE OF EVIDENCE NECESSARY AT TRIAL

Civil No. 05-cv-49053

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HEADQUARTERS MUROC ARMY AIR FIELD  
Office of the Commanding Officer  
Muroc, California

Reports Control  
Symbol Eng/OT/06

20 August 1946

SUBJECT: Land Purchase Requirements for Muroc Army Air Field.

TO: Commanding General, San Bernardino Air Materiel Area,  
San Bernardino, California.

1. In reply to TT SBCON5-BK-8-27, the following land requirements are necessary to carry on continued flight test operations of this base. The expansion of the research program makes it mandatory that facilities be available at all times so that development work will not suffer due to lack of proper preparation of the ground work.

2. a. Location of land to be acquired:

All land not presently owned by the War Department extending from the center of Rogers Lake along the railroad tracks in an easterly direction to include all of Section 3 and 4 and 5 of Township 10 N, Range 8 W. This to include all tracts of land adjacent to the railroad tract and adjoining the present War Department property line along all the interior lines and interior property corners not now owned by the War Department. This is shown in Area "A" on incl. map, containing approximately 9 1/2 square miles.

The following boundaries to include all property not presently government owned, beginning at NE corner of Section 1, Township 10 N, Range 10 W, which is a government corner extending in westerly direction four miles to NW corner of Section 4 of Township 10 W, Range 10 W, thence in southerly direction along section lines five miles from said corner to the SW corner of Section 28, Township 10 N, Range 10 W, thence in a westerly direction along Section line 10 1/2 miles to the quarter section corner between Sections 27 and 34, Township 10 N, Range 12 W, thence in southerly direction 11 miles on center line of sections to the quarter section corner between Sections 22 and 27 of Township 8 N, Range 12 W, thence in easterly direction along section lines 20 1/2 miles to the southeast corner of Section 24, Township 8 N, Range 9 W, thence in northerly direction along township line three miles to SE corner of Section 1, Township 8 N, Range 9 W, which is government property. Locations of land is shown on inclosed map as section A, B, C, D & E.

b. Name of Installation.

Muroc Army Air Field, Muroc, California.

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c. Distance of Premises from Main Base if not Part of Main Base.

All land adjoins main base on north, west and south, totaling approximately 190 square miles. The furthestmost removed parcel of this land is 12 1/2 miles distant. See inclosed map for detailed locations.

d. Purpose and need of Acquisition.

To develop a station of sufficient magnitude to accommodate flight testing and related projects of AAF. To permit the full utilization of the lake bed, railroad land and contiguous areas are necessary. The north-west area is required for a clearance zone at the west end of Flight Test Base runway; also, to provide suitable locations for administration, residential and service requirements, which should be removed a safe distance from all flying activity.

The area on the west must be acquired for a long runway with extensive clearance zones. Outlying areas are necessary to prevent private installation of flight test hazards. It is reported that a railroad is contemplated through the area indicated in this west portion.

The southern area is essential for N8 runway clearance and special project installations.

e. Reason why other Government owned facilities are Unsuitable.

There are no other government owned or leased facilities adjoining the station or in this vicinity which are suitable for further expansion or development.

f. Type and Present Use of Land to be Acquired.

Type of required land consists of desert and dry lake beds. Presently used for agriculture, grazing, ranching and mining.

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g. Reasons why Another Site would not Serve the Purpose.

No other site in this vicinity with terrain features will permit the installation of a runway which can extend for 18 miles. Dry Lake beds with generally flat surrounding terrain lend themselves admirably to flight test work where planes can land at any time without fear of serious damage.

h. Existing Improvements on Proposed Land and Estimated Value.

The AT&SF railroad extending from Boron to Mojave must be moved to, generally, a line between these two towns, which will cause it to run along the north boundary of the reservation. This railroad now crosses Rogers Dry Lake, denying the full utilization of the lake to the Army.

Estimated cost of moving railroad	\$2,010,000
Estimate of moving power line and installing allied equipment	164,000
Estimate of Muroc property, exclusive of FPHA project.	20,000
Estimate of cultivated areas	1,380,000
Approximately 10 stock ranches	150,000
Estimate of remaining area, less cultivated land, stock ranches and indicated property.	550,400

i. Acreage required.

Approximately 121,500 acres required.

j. Type of interest to be acquired and estimated cost.

Acquisition should be by purchase of entire area of all interest not now held by U.S. Government.

Estimated cost of land - \$550,400.00 (Does not include improvements, moving railroad, agriculture or mining interests and their immediate lands.)

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k. Pertinent remarks. Conclusive Demonstration of  
Military necessity.

- a. Keeping in mind the primary purpose of this base which is preliminary aircraft testing, future aircraft developments indicate larger and faster planes requiring longer and wider runways with clearance <sup>are</sup> zones not now considered adequate. Fuels that/highly volital and come with critical combustion characteristics will be used, requiring specialized dispersed storage for which this base is not presently designed. Specialized projects of a highly classified nature requiring facilities, now geographically located near the present base boundaries, do not provide sufficient safety zones for public protection nor permit secrecy of development secluded from outside observation.
- b. Present development of recent type propulsion for aircraft use, now requires additional facilities and area for flight testing which at present do not exist at Muroc. This type of experimental work conducted by various manufacturers as well as the Army, demands much greater dispersion than heretofore required with conventional types of propulsion. These facts are substantiated by project work presently undergoing development at this base.

3. Part II of teletype on lease requirements is omitted as it does not apply to the present request.

/s/ S. A. Gilkey  
S. A. GILKEY  
Colonel, Air Corps  
Commanding

1 Incl.  
Map

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EAFB - History Center - Bldg 1405  
(Box) EDW: [Muroc AF] WWII 1940  
(Folder) 7B Title Edwards: Muroc Army  
Airfield Base