

RDI APPLICATION
MANGANESE ROAD
WASHINGTON COUNTY,
UTAH

ATTACHMENTS 38

Biography and
Foundation
Marvin Jones

IN THE UNITED STATES JUDICIAL DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

WASHINGTON COUNTY, UTAH,)
a Utah political)
subdivision; and STATE)
OF UTAH,)
)
Plaintiffs,) Case No. 2:12-cv-00471 CW
)
v.) Judge Clark Waddoups
)
UNITED STATES OF AMERICA,)
)
Defendant.)
)
and)
)
SOUTHERN UTAH WILDERNESS)
ALLIANCE, et al.,)
)
Proposed Intervenor)
Defendants.)

Videotaped deposition of MARVIN A. JONES,
taken by the Plaintiffs, on Wednesday, May 8, 2013,
at 2:00 p.m., at The Justice Center, 33 North
100 West, Suite 350, St. George, Utah, reported by
Jerry R. Martin, RPR.

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I N D E X

3

Witness

MARVIN A. JONES

EXAMINATION BY

PAGE

Mr. Rampton

4

Ms. Stimmel

93

E X H I B I T S

NO.

DESCRIPTION

PAGE

10 Washington County (West Side) R.S. 2477
Rights-Of-Way

7

(Exhibit 10 was marked prior to taking the
deposition.)

1 P R O C E E D I N G S

2 --oOo--

3 MS. BORGESON: It is May 8th, 2013. This
4 is the deposition of Marvin Jones. Present are
5 Mr. Jones and the court reporter, Jerry Martin; Tony
6 Rampton from the Utah State Attorney General's office;
7 Jodi Borgeson from the Washington County Attorney's
8 Office; Anna Stimmel from the U.S. Department of
9 Justice; Jess Krannich from -- counsel for SUWA and
10 other interveners, proposed interveners; and Eric
11 Clarke will be joining us from the Washington County
12 Attorney's Office later.

13 MR. RAMPTON: Would you swear the witness,
14 please.

15 --oOo--

16 MARVIN JONES

17 was called as a witness, having been first duly
18 sworn, was examined and testified on his oath as
19 follows:

20 --oOo--

21 EXAMINATION

22 BY MR. RAMPTON:

23 Q. Mr. Jones, will you state your full name
24 for the record.

25 A. Marvin Angus Jones.

Jerry Martin, RPR
Reporters Inc. (801) 746-5080

1 Q. And where do you presently reside,

2 Mr. Jones?

3 A. 425 South 400 East, St. George, Utah.

4 Q. How long have you lived in St. George?

5 A. Since 1949.

6 Q. And where did you live before that?

7 A. Gunlock, Utah.

8 Q. Where were you born?

9 A. St. George.

10 Q. And what was your date of birth?

11 A. 7/2/31.

12 Q. Have you had your deposition taken

13 before?

14 A. Not really. Not really, that I remember

15 anyway.

16 Q. Yeah. We talked a little bit last

17 evening about what we'll be doing here today. I

18 think the rule we both have to adhere to pretty

19 strictly is that, because the reporter is taking down

20 every we say, we can't talk over one another because

21 he can't take two people at the same time; so if

22 you'll wait until I finish asking a question before

23 you start answering, and I'll try to do the same with

24 you just so that the reporter can take it all down.

25 A. Okay.

1 Q. Before we get into talking about roads,
2 I'd like to just get some background information
3 regarding your history in this community and your
4 family's history in the community.

5 Let's go back. You said you were born in
6 St. George in 1931.

7 A. Yes.

8 Q. And where did your parents live at that
9 time?

10 A. They lived in Gunlock.

11 Q. And how long had your parents lived in
12 Gunlock? Do you know?

13 A. Oh, I think possibly a year and a half.

14 Q. And where did they live before that? Do
15 you know?

16 A. Well, they had just got married about
17 that -- let's see. Two years. So it would be two
18 years.

19 Q. Where did your father live before
20 Gunlock?

21 A. He lived in Gunlock.

22 Q. So your dad was --

23 A. He was raised in Gunlock.

24 Q. And where did your mom come from?

25 A. At the time my father met her, she was

1 in a -- on a ranch up in -- by Delta on, I think,
2 what they call Southerland.

3 Q. What did your father do for a living?

4 A. He was -- well, they had a ranch in
5 Gunlock. They had property north of Gunlock and in
6 the town of Gunlock at the time, and he was one of
7 the children that my grandfather had. They had quite
8 a big family, boys and girls, and they just lived off
9 the ranch.

10 Q. So your grandfather was also from
11 Gunlock?

12 A. Yes. Edwin Jones.

13 Q. Where was the ranch?

14 A. It was north of Gunlock about, oh, 3,
15 4 miles right at the forks of the creek where Magotsu
16 and Moody come together with the Santa Clara Creek.

17 Q. Can you find that location on Exhibit 11?
18 Excuse me. Exhibit 10.

19 A. Okay. Where is Veyo, Tony? Help me.

20 Q. (Points on document.)

21 A. Right there?

22 Q. Mm-hmm.

23 A. Okay. The Veyo to Gunlock Road, right
24 here. Has it got the Santa Clara Creek? Yeah, Big
25 Little Ranch Road. It was approximately right in

1 this area where the two -- where Magotsu and Moody --
2 or where Moody Wash comes into -- and Magotsu with
3 the Santa Clara Creek. It's right at this point
4 here. No. That's too far down because that's Tobin
5 Wash. It would be right in here somewhere.

6 Q. Okay. Was it -- it was private property?

7 A. Yes.

8 Q. Is this the approximate location of the
9 ranch?

10 A. It would have to be. They haven't got
11 where Gunlock is exactly on this, have they?

12 Q. It says "Gunlock" down here, but I don't
13 think --

14 A. Gunlock Highway here and Gunlock Highway
15 here and Gunlock Highway here.

16 Q. Right. I know.

17 A. So Gunlock would have to be approximately
18 right here, I would think.

19 Q. Okay. And where -- where is your ranch,
20 do you think?

21 A. It's -- it would be right up here above
22 the Tobin Wash Road a couple of miles. Right in
23 here.

24 MR. RAMPTON: Okay. The witness is
25 pointing to an area that is --

1 Did it straddle Gunlock Road?

2 THE WITNESS: The property was on each
3 side of the road, yes.

4 MR. RAMPTON: All right.

5 So the witness is pointing to an area
6 that straddles the Gunlock/Veyo Road between the
7 Enterprise Gunlock Road and Tobin Wash Road.

8 Q. (BY MR. RAMPTON) Was that a cattle
9 ranch?

10 A. They had cattle, yes.

11 Q. Did your grandfather raise cattle?

12 A. They didn't have a large herd, but it was
13 mostly a ranch that they had fruit trees, big
14 vegetable garden, self-sustaining, you know, that
15 sort of thing. And --

16 Q. Where did your grandfather run his
17 cattle? On the ranch?

18 A. Mostly on the ranch, yes. They had a
19 home in Gunlock and then a ranch house too. So...

20 Q. Did you know your grandfather?

21 A. Yes. I was just young when he was killed
22 in an accident. He was a mail -- he hauled the mail
23 from Veyo to Gunlock with a team of horses on a
24 two-wheel trailer, and he was -- he was killed. One
25 of the horses -- I don't know. Something broke, and

1 one of the horses kicked him in the head.

2 Q. When was it that your grandfather --

3 A. I think that was in -- I think it was in
4 '35.

5 Q. So when you were a little boy.

6 A. Yes.

7 Q. Let's talk about your father for a few
8 minutes. What did your father do for a living?

9 A. Well, we -- we didn't have enough -- a
10 big enough place in Gunlock to sustain ourselves; so
11 my father worked away from home a good share of the
12 time. My grandfather lived with us, and he was more
13 or less my dad growing up. But dad held various jobs
14 in the mines in Pioche, the Apex Mine out here on the
15 West Mountain.

16 Q. Which grandfather lived with you?

17 A. My mother's grandfather, McCallister.

18 Q. And how long did he live with you?

19 A. Oh, off and on until -- actually until we
20 moved down here in St. George. He lived with us a
21 while in -- in the '50s.

22 Q. All right. So your family home was in
23 Gunlock, though, when you were a kid?

24 A. Yes.

25 Q. Did you go to school in Gunlock?

1 A. Yes, I did.

2 Q. Did you attend high school in Gunlock?

3 A. No. Up -- up through the sixth grade.

4 And then we rode the bus from Gunlock to St. George,

5 and my father was the bus driver.

6 Q. Did you graduate from St. George High?

7 A. Yes.

8 Q. Or Dixie High was it called?

9 A. Dixie High and Dixie Junior College.

10 Q. What year did you graduate from high

11 school?

12 A. '48, 1948.

13 Q. And did you attain a degree from Dixie

14 College?

15 A. Yes. It was just two years of college

16 was what it was, was what I graduated from.

17 Q. When you were a child, did you get

18 involved at all in your grandfather's ranching

19 operation up on the ranch?

20 A. No. No.

21 Q. When did you get your first job?

22 A. My first job. Well, let's see. When I

23 was going to -- I worked for the Washington County

24 Road Department when they built the first bridge into

25 Gunlock across the Santa Clara Creek. "Bing"

1 McArthur was over the roads in Washington County at
2 that time.

3 Q. Was that just summer employment?

4 A. Yes.

5 Q. Where was the bridge that you installed?
6 What year would that have been?

7 A. Well, it was -- it would have been in the
8 '40s, Tony.

9 Q. All right.

10 A. Now, this road -- this is U-18; right?

11 Q. Yes.

12 A. And this is the one that comes out of
13 Dammeron Valley and comes down into Gunlock from over
14 the Black Ridge?

15 Q. Yes.

16 A. Right there. Right there where that
17 connects on, right across the creek right there.

18 Q. All right. I'm going to draw a line
19 where you've indicated that bridge was.

20 A. Well, it was across -- yeah. This is the
21 road. It's under this road here is where it was,
22 going into Gunlock.

23 Q. So --

24 A. The Santa Clara Creek came and turned
25 right there under this road, and this road come into

1 it on the south side of it.

2 Q. Was the bridge on the road going north
3 and south or east --

4 A. Yes.

5 Q. So it was actually on the Gunlock/Veyo
6 Road, this stretch of the road.

7 A. Yes, that you came up from the Indian
8 reservation.

9 Q. All right. I'm going to mark --

10 A. It would be across this way, under that
11 road there.

12 Q. And you say that Mr. McArthur, Bing
13 McArthur, was the superintendent at that time?

14 A. Yes.

15 Q. Was that before you graduated from high
16 school?

17 A. Yes.

18 Q. Did you have any employment between high
19 school and college?

20 A. Yes. I -- in the summertime I went down
21 into Logandale and worked on a dairy. I worked for a
22 gentleman in Logandale, Nevada, on a dairy farm two
23 summers, and then I went out into Alamo, Pahrana-gat
24 Valley, and worked on a dairy farm -- dairy ranch out
25 there for one summer.

1 Q. Let's talk about your years after you
2 graduated from Dixie College. How were you first
3 employed after you graduated from Dixie College?

4 (Mr. Clarke enters the room and
5 Ms. Borgeson leaves.)

6 A. I was working -- well, let's see. I
7 graduated in '51, and I -- I got married in 1951.
8 But I worked in a feed store for Elmer Hall for a few
9 months, and then I was drafted into the service.
10 They drafted me into the Marine Corps in '51.

11 Q. Where did you serve?

12 A. Third Marine Division in Oceanside,
13 California, at Camp Pendleton.

14 Q. When were you discharged from the
15 Marines?

16 A. In '53.

17 Q. So when you came back in 1953, where did
18 you live?

19 A. I lived in St. George.

20 Q. Did you live in St. George -- I think you
21 had testified that you moved to St. George first in
22 1949?

23 A. Right. From Gunlock.

24 Q. Was that -- that was before you were
25 married, then.

1 A. Right.

2 Q. And is that when you started to attend
3 Dixie College?

4 A. Yes. Yes. I started at Dixie College in
5 1950, the fall of 1950.

6 Q. When you came back out of the Marine
7 Corps to St. George, how were you employed?

8 A. At first I went to work for Picket Lumber
9 Company here in St. George for about six months, and
10 then I was offered a job driving delivery truck for a
11 man by the name of Andrew Holt. It was delivering
12 gas and oil and diesel fuel and that sort of thing.
13 It was UTOCO.

14 Q. Would you deliver gas in Washington
15 County?

16 A. All over Washington County.

17 Q. How long did you have that --

18 A. Ten years.

19 Q. That would take us up to approximately --

20 A. '64.

21 Q. -- '64.

22 A. Mm-hmm.

23 Q. And how were you then employed?

24 A. In '64 I went to work for OK Tire Service
25 here in St. George.

1 Q. How long did you hold that position?

2 A. Six years.

3 Q. That takes us through 1970. How were you
4 then employed?

5 A. For two years I was security officer at
6 Dixie College.

7 Q. And in '72 how were you then employed?

8 A. I went to work for the City of
9 St. George.

10 Q. And what was your position?

11 A. I was a public works director.

12 Q. And how long did you hold that position?

13 A. I retired in '93.

14 Q. During your early life -- that is let's
15 talk about the period between 1931 and the time you
16 went into the Marines -- did you in that first part
17 of your life get involved in your family's ranching
18 operation at all?

19 A. Well, as I grew a little older, you know,
20 I was -- we all had our chores so to speak. I was
21 the oldest. I milked the cows and cut the wood.
22 Yeah, we raised pigs. We raised chickens. We had a
23 large garden. We had fruit trees. We were pretty
24 well self-sustaining. We had a huge cellar that my
25 mother filled in the fall of the year to get us

1 through the winter with bottled fruit, vegetables --
2 anything -- meat. So we had our -- we had our jobs
3 to do.

4 Q. And was that out on this ranching
5 property that --

6 A. That was on the small 8 acres that my
7 father owned.

8 Q. And was that in the city of Gunlock?

9 A. It was in the town of Gunlock, yes.

10 Q. Did you ever work out on your
11 grandfather's ranching property?

12 A. Like I say, no. That was when I was very
13 young.

14 Q. Okay. Was that property ultimately sold
15 by your grandfather?

16 A. Yes.

17 Q. Did you hunt in your lifetime? Have you
18 been a hunter?

19 A. That was more important to me, Tony, than
20 Christmas or Thanksgiving or Easter, 4th of July or
21 anything.

22 Q. When did you start hunting?

23 A. My mother said I started following my
24 grandfather when I was six years old.

25 Q. When did you get your first rifle, your

1 first firearm?

2 A. Well, I killed my first deer with my
3 grandfather's 30.30 when I was 12 years old. You
4 can't get me for the statute of limitations, Tony.

5 Q. Did you ever have a deer hunting business
6 of any kind?

7 A. Yes. Back then nearly everybody in the
8 town of Gunlock and Veyo and Central Pine Valley --
9 we had what we called a deer camp, and this was when
10 the California hunters used to come up. Every year
11 they would come up before the hunt ever started, and
12 they camped in the streets. They camped outside of
13 town. Yes, we -- we did run a deer camp. My
14 grandfather more or less was in charge of it for
15 quite some time because dad, like I say, was working
16 somewhere else, and I helped him.

17 Q. Which grandfather are you talking about?

18 A. McCallister, my mother's grandfather.
19 The other one got killed in '35.

20 Q. Right. Your mother's father, then.

21 A. My mother's father.

22 Q. And where was this deer camp that your
23 grandfather ran?

24 A. The one that we ran was right there in
25 the streets of Gunlock. They camped along the -- on

1 the sides of the street. It was a graveled road
2 right up the center of the little town, and they
3 camped wherever they could in tents, trailer houses,
4 whatever.

5 Q. When did you first become involved in
6 that deer camp operation? How old were you?

7 A. Well, like I say, I was -- I was
8 following my grandfather when I was six years old,
9 and so I would say probably after when I was about
10 10 or 12 years old is when they -- he started this
11 deer camp. It would have been in the '30s.

12 Q. How long did your grandfather operate the
13 deer camp in Gunlock there?

14 A. Oh, it was probably -- well, I imagine it
15 was close to eight to ten years, over a period of
16 time, yes, when they did.

17 Q. Did -- was the deer camp ever moved out
18 of Gunlock?

19 A. Not ours. Not ours.

20 Q. So your -- when did your family stop
21 being involved with the deer camp as such?

22 A. Well, for a period of time my grandfather
23 discontinued that. But after I came home out of the
24 service in the '50s, I had gotten acquainted with
25 fellows down there who were from California, and they

1 came up, and I actually took them out after I come
2 home in the '50s for probably six or eight years.

3 Q. That would take us to approximately 1960.
4 Did you continue to hunt after 1960?

5 A. I still do, Tony, whenever I can draw
6 out.

7 Q. Have you since 1960 run any kind of a
8 deer hunting business?

9 A. No. It's just been family.

10 Q. All right. So it's safe to say that
11 you've been a deer hunter all your life.

12 A. Definitely.

13 Q. And you continue to hunt deer.

14 A. Yes.

15 Q. Let's talk for a minute about the
16 business, the deer camp, that was operated by your
17 grandfather in -- this would have been prior to 1953,
18 I guess. Is that accurate? It would have been
19 before you went to the Marines?

20 A. Yes. Yes.

21 Q. Did -- I take it that deer hunters stayed
22 in Gunlock, but they hunted outside of Gunlock in the
23 hills?

24 A. Yes.

25 Q. Now, would your grandfather act as a

1 guide in taking the deer hunters out, or did he go
2 out with them? Did he supply them? What --

3 A. Yes.

4 Q. What was his involvement?

5 A. Yes, he was a guide more or less and took
6 them out in different areas where -- where we'd done
7 the hunting. You see the Tobin Wash Road here? That
8 was one of the areas, yes. Manganese Road was
9 another area. We covered this whole area in here
10 clear back out beyond the Square Top Mountain out
11 into Gold Strike.

12 MR. RAMPTON: All right. The witness is
13 pointing to an area that goes out Tobin Wash and goes
14 over to the road called Gold Strike.

15 Q. Did you ever get up in the area up around
16 Cougar Pass?

17 A. We got up into Slaughter Creek, yes, up
18 around Potter's Peak and Pot -- and Gold -- Slaughter
19 Creek, yes. And, actually, a time or two we got over
20 as far as the Beaver Dam Wash and ended up in that
21 area too.

22 Q. When you started taking your friends from
23 the military in the '50s out hunting, where would you
24 take them?

25 A. Sometimes in the same area, but also we

1 would come up -- we hunted up the Blake and Gubler
2 Road, up this direction, and then we took the road
3 up -- yeah, Goat Spring Road, up the Goat Spring Road
4 up under Pine Valley Mountain. We hunted up in this
5 area here. We hunted, well, this whole area right in
6 here.

7 MR. RAMPTON: All right. The witness is
8 indicating an area that is east of the highway and
9 east -- generally east of Veyo and Gunlock east of the
10 highway, this area here.

11 Q. Have you hunted the areas that you've
12 indicated that your grandfather hunted with his deer
13 camp and you later hunted with your friends from
14 California? Is this entire section of Washington
15 County which is north of, say, Manganese Road and
16 Gunlock Highway -- have you hunted that whole area
17 most of your life?

18 A. Yes. We even -- Tony, up -- now, is this
19 the road that goes on up to Enterprise?

20 Q. Yes.

21 A. We even went into Enterprise and came
22 back into what they call Ox Valley. This is another
23 area where we usually went the first morning, because
24 it was farther up before the deer came down, and we
25 went right into the town of Pine Valley -- of

1 Enterprise and we came south into what they called Ox
2 Valley and that's an area where we hunted. It's
3 north of the Tobin Wash Area, the Tobin Breaks and
4 that sort of thing.

5 Q. All right. Did you hunt every year that
6 you were living in Washington County?

7 A. The only time I missed a deer hunt was
8 when I was in the service.

9 Q. And how long does that deer hunt season
10 or deer season last? How long does it go in a year?

11 A. It usually started on a Saturday, went
12 through two weekends, and ended on a -- it was either
13 a Monday -- yeah, Monday night. I think it was eight
14 or nine days.

15 Q. Was that in the fall?

16 A. It was in October, the latter part of
17 October.

18 Q. During that two-week period did you cover
19 a lot of ground in terms of your hunting? Generally
20 was there places you regular went, annually went,
21 hunting.

22 A. Yes. Like I say, we would go higher up
23 because that's where the deer usually were. The
24 hunting pressure drives your deer down. Same thing
25 off of Pine Valley Mountain. We would hunt up there,

1 and then we would just go up into the Tobin area or
2 west of Veyo or up in here at the foot of the
3 mountain. As the deer would come off, we would just
4 try and catch them as they were drifting or going
5 south, intercept them, I guess.

6 Q. Would you each year hunt the entire area
7 that you've indicated on the map you've hunted
8 generally?

9 A. Well, until we filled our hunters up, and
10 then we were through. But it seemed like every year
11 my grand -- my father and I and one of my brothers
12 would always end up out here to Gold Strike because
13 this was the area where the deer came down into, and
14 they had a lot of cover and they had water and they
15 had feed. We'd go out there and camp the second
16 weekend and -- and hunt there to fill our tags.

17 Q. I'm just trying to get a sense,
18 Mr. Jones, of how frequently you were in the areas --
19 we'll -- we'll divide them up. How frequently would
20 you go into the area, hunting that is, east of the
21 highway, east of Highway 18? Were you going every
22 year? every other year?

23 A. No. We'd usually go in every year
24 because this was an area where the deer came, like I
25 say, off of Pine Valley Mountain, and this was an

1 area that they moved down through, and it was usually
2 pretty good hunting up in this area here, yes.

3 Q. And would you every year hunt in the
4 Tobin Wash over to Cougar Pass area?

5 A. Definitely in Tobin Wash because we had
6 what they call the Tobin Breaks that they would come
7 down into, and then we would gradually get farther to
8 the -- to the west over into -- in fact, the deer
9 herd, some of them went into Nevada; so that's what
10 got us over in here next to Potter's Peak and
11 Slaughter Creek and that -- and Daggett Flat too.

12 There's a road that goes right up through Daggett
13 Flat there, and that's another area we went into.

14 Q. So the areas that you've indicated on
15 Exhibit 10 as your deer hunting areas, you hunted
16 them almost every year.

17 A. Definitely, yes. I'd take time off to go
18 hunting.

19 Q. And this started when you were 12 years
20 old. That's when you got your first deer.

21 A. That's right.

22 Q. Other than that two weeks when the season
23 was actually on, did you ever get out into the areas
24 that you went to during the season? Did you scout or
25 anything like that?

1 A. Well, we cut wood. We went out and
2 hauled wood out of these areas because mom was
3 running a wood-burning stove all the time. That's
4 what she cooked on.

5 Q. Where would you gather wood?

6 A. Mostly in the Tobin Wash area, up in
7 here, because that was closer to home. In this area
8 up in here.

9 Q. Was that something you would do on a
10 regular basis?

11 A. Every year to get our winter's wood.
12 Well, she burned it in the summertime even.

13 Q. Did anything else take you out on these
14 roads and into these areas other than gathering wood?

15 A. Later on in life out in this area on the
16 west side over in around Cougar -- Cougar Pass and in
17 that area, I worked for -- on weekends just more or
18 less as a -- I didn't work for them, but -- well, I
19 did. The Hafen boys had a big ranch in Nevada, and I
20 helped them with their cow herd out in there. They
21 had cattle that would get over in this area, and we'd
22 go up in there and try and gather -- it was off of
23 their range, and we'd try to gather them and haul
24 them back out of there and back onto their range in
25 Nevada.

1 Q. What years did you work for the Hafens?

2 A. From '64 until '70, six years.

3 Q. Did you continue to live in St. George?

4 A. Yes.

5 Q. And would you drive out daily, or how

6 much of the year?

7 A. When we worked there, it was usually on
8 weekends. We would go out to the ranch, stay at the
9 ranch, and then come back into this area from Nevada
10 side.

11 Q. All right. Let's talk for a few minutes
12 about your use of vehicles and horses and means of
13 transportation when you were doing these various
14 activities. Let's start with your hunting. Did you
15 take vehicles out on roads while you were hunting?
16 Is that how you got around, or how did you get
17 around?

18 A. We took vehicles, but we also hauled
19 horses because later on -- well, in fact, I had --
20 I've had horses since probably -- well, it was one of
21 the first things I done when I come home out of the
22 service, was buy a horse, and that would have been in
23 '54.

24 Q. All right. And when your grandfather was
25 operating the deer camp -- and this was prior to the

1 time you went into the Marines -- did your
2 grandfather have a vehicle he used in conjunction
3 with the deer camp?

4 A. We used the vehicles that the California
5 hunters had. This is what we done our transporting
6 back and forth with. He didn't have -- he didn't
7 have a vehicle. My father did, but he didn't.

8 Q. So you just went out in the vehicles the
9 people drove from California.

10 A. Yes.

11 Q. How did you get horses out?

12 A. Well, and we didn't have horses when I
13 was younger.

14 Q. I see.

15 A. I didn't have -- like I say, it was in
16 '54 when I -- well, now, we had a horse when I was
17 younger, but we didn't use it to haul deer with and
18 things like that.

19 Q. Once again I'm talking about the period
20 before you went into the service. Were the vehicles
21 that your clients from California drove -- were they
22 generally at that time two-wheel vehicles or
23 four-wheel vehicles?

24 A. Most of the time, in fact every year that
25 I can remember, they would pull a jeep up behind

1 their pickup, and that's what we done a lot of the
2 traveling in, is in a jeep.

3 Q. All right. When you got back from the
4 service and you were taking out your friends from
5 California, did you have a vehicle?

6 A. Yes, I did.

7 Q. And what kind of a vehicle was that?

8 A. I had a pickup.

9 Q. Was that two-wheel or four-wheel drive?

10 A. At the time it was just a two-wheel.

11 Q. Did there come a time when you started
12 driving a four-wheeled vehicle, four-wheel drive
13 vehicle, in your hunting?

14 A. Yes.

15 Q. When do you think you started using
16 four-wheel drive?

17 A. It was in the -- let's see. The first
18 four-wheel drive pickup. It was in the early '70s.

19 Q. So from approximately '53 to early '70s
20 you were using two-wheel drive vehicles?

21 A. Yes.

22 Q. When you gathered wood as a kid or as a
23 young man, would you use a vehicle?

24 A. Oh, yes.

25 Q. And was that your father's vehicle?

1 A. Yes.

2 Q. What kind of a vehicle was that?

3 A. He had a pickup.

4 Q. Was that two-wheel or four-wheel?

5 A. It would have been two-wheel.

6 Q. And during the period of time that you
7 were driving out to work for the Hafens, were you
8 driving in a two-wheel or a four-wheel?

9 A. All they had was -- their trucks were
10 just two-wheel drive.

11 Q. Now, let's talk specifically how you
12 would use vehicles in conjunction with your -- your
13 deer hunting. Would you -- would you drive the roads
14 with vehicles, or would you drive the roads to get
15 horses to points and go on horseback?

16 A. Most of our hunting then was afoot, Tony.
17 We would drive into an area, and it was always --
18 now, when you say driving, you know, along roads, no,
19 we didn't road hunt. We got out and drove patches of
20 ground. We had guys that we'd send out ahead, go up
21 to high above, drive to them. This was the way we
22 hunted.

23 Q. So you used the roads simply to get
24 points from which you walked.

25 A. From point A to point B and that sort of

1 thing wherever we went, yes.

2 Q. And is that the way you hunted through --
3 you've hunted all your life?

4 A. Well, after I got horses, no. I rode
5 horse.

6 Q. So after a certain point -- and this is
7 after you got back from the Marines?

8 A. Yeah, in the early '50s. Like I say, I
9 bought me a horse, and I had two or three horses.
10 Well, most of the time I had one, and then sometimes
11 two or three head of horses that we used.

12 Q. Did you have a horse trailer?

13 A. I had a horse trailer and a tip-in rack
14 into the trailer, yes.

15 Q. All right. So you took the horses out on
16 the roads in a horse trailer and then rode from there
17 rather than walked.

18 A. Yes.

19 Q. Okay. Is that the way you still hunt?

20 A. No. I hunt afoot or on a four-wheeler.
21 I had to have my knees replaced in the '90s. So...

22 Q. When did you get your first four-wheeler?

23 A. Oh, I got my first -- let's see. It
24 would have been in the early '90s.

25 Q. When you were gathering wood for your

1 mother, how would you use a vehicle?

2 A. Well, we'd just drive into an area until
3 we found enough wood that we can -- well, we had to
4 move around sometimes -- dry wood to fill our pickup
5 and then cut it with a saw and then haul it back to
6 Gunlock.

7 Q. And you indicated that you did that in
8 the Tobin Wash area primarily?

9 A. Tobin Wash and Manganese and out on the
10 Jackson Road here. It was easy to get from this
11 point to here and up -- up this Manganese Wash and up
12 around, like I say, Square Top Mountain and that sort
13 of thing.

14 Q. Okay.

15 Let's start talking about specific roads,
16 and I'm going to focus on the area -- first of all on
17 the area that is essentially east of Highway 18, east
18 of Veyo there.

19 A. Mm-hmm.

20 Q. And let's start right up at the top just
21 below -- do you see where Highway 18 is?

22 A. Yes.

23 Q. And what is this road that goes off to
24 the east?

25 A. Isn't this Pine Valley right here?

