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Terri A. Lorenzon, Director
Environmental Quality Council

October 16, 2007

Wyoming Environmental Quality Council
122 West 25th Street
Herschler Building
Cheyenne, Wyoming 82002

Re: Comments on the Adobe Town Very Rare or Uncommon Designation Proposal

Dear Environmental Quality Council:

Please accept these comments in support of designation of the Adobe Town area as a Very Rare or Uncommon Area. The Wyoming Outdoor Council is a party to the Petition seeking Very Rare or Uncommon designation for the magnificent Adobe Town area in southcentral Wyoming, and we reiterate our support for such a designation here.

As has been emphasized to the Council, we believe it is important for this designation to be extended beyond just the existing BLM Wilderness Study Area boundary to include the full area harboring special values that is identified in the Petition. The BLM Wilderness Study Area is largely already protected from development pressures due to its WSA status, and WSA status also draws considerable public attention and recognition to this portion of the Adobe Town Area. Consequently, a Very Rare or Uncommon designation that only included the WSA would be of relatively little effect; the entire area identified in the Petition should receive, and is in need of, Very Rare or Uncommon designation if enhanced protection and public recognition is to be afforded this magnificent area.

Other commentors have identified many of the special sections of this area that make protection of the entire area warranted. They have also identified many of the special values of this area. And the Board has seen many of these special areas and values for itself when it toured the area on August 28. Special areas beyond the WSA itself that are deserving of protection include the magnificent Haystacks, Willow Creek Rim and badlands, the Skull Creek Rim and surrounding flats, and the Powder Rim. Special values of the Adobe Town area which are discussed in detail in the Petition include the significant historical values of the area, its remarkable wildlife resources, unique geological features, and its National Park quality scenic values. To ensure protection of all of these areas and important resources, we urge the Council to afford

Very Rare or Uncommon designation and recognition to the entire proposed Adobe Town Very Rare or Uncommon Area.

We recognize that there are other landowners that utilize and have interests in this area, such as the Rock Springs Grazing Association and Andarko Petroleum Corporation. We do not believe, however, that they would be negatively affected by Very Rare or Uncommon designation. The designation would not affect activities on private landholdings (specifically, in the "checkerboard" area in the north part of the area), and many activities could still occur even on the State and Federal landholdings that would be subject to the designation. Grazing could continue, and valid oil and natural gas leases could be developed if desired by the lessee, and as discussed in the Petition, there has been very little oil and gas drilling in this area and it has been uniformly uneconomic. Generally speaking, we believe history shows that protective designations such as this have rarely if ever had substantial negative impacts on resource development when viewed at a state, regional, or national scale, and often such designations create economic development opportunities (tourism) due to the greater recognition brought to an area. Consequently, we believe designation of the entire Adobe Town Area as Very Rare or Uncommon would not create substantial negative impacts on existing landowners and uses, and that it might in fact be an economic stimulus for this area.

We believe that designating the Adobe Town Area as Very Rare or Uncommon would be a step toward the balanced approach to resource development that Wyoming Citizens are increasingly demanding, especially relative to oil and natural gas development. It is our view that some areas in Wyoming must be afforded protection from development, while undoubtedly significant areas of the State will experience development. We believe the Adobe Town Area is one such area that should receive protection from development so that its overwhelming and important natural values can be available to and experienced by this and future generations. We would note that massive oil and gas development is occurring or is proposed just outside of the Very Rare or Uncommon Area. Just to the east sits the just-approved Atlantic Rim 2000-well project area, just to the northeast surrounding Wamsutter sits the nearly-9000-well Continental Divide-Creston project that the BLM is currently preparing an environmental impact statement for, and just to the southwest sits the proposed 4200-well Hiawatha Regional Energy Project development area. The increase in interest in uranium development that is being expressed is largely focused in the Powder River Basin and the Jeffrey City/Gas Hills area, and as the Governor has recognized oil shale development would almost certainly be focused in Colorado, not Wyoming. Given this, it is our view that the balance Wyoming citizens are demanding argues in favor of affording Very Rare or Uncommon designation to the entire magnificent Adobe Town Area when such massive development is occurring in substantial other areas of the State.

Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bruce Pendery", with a long horizontal flourish extending to the right.

Bruce Pendery