



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

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122 W. 25th Street, Herschler Building, Room 1714
Cheyenne, Wyoming 82002

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Terri A. Lorenzon, Director
Environmental Quality Council

Dear Wyoming Environmental Quality Council:

Please find attached the Bureau of Land Management's (BLM) response to the questions presented by the Council to the BLM at the hearing in Rock Springs on August 29, 2007. Please submit this information for the record of the October 24, 2007, hearing.

Should you have any questions or need additional information, please contact me at 307-775-6113.

Sincerely,

Jane D. Darnell
Deputy State Director,
Resources Policy and Management

Attachment

Adobe Town Review
Questions Presented by the Council - August 29, 2007, Rock Springs, WY

1. What's the effect of this designation?

Federal lands must be managed under federal law, regulations, and according to land use plans which are developed pursuant to those laws, which include a public process. The designation would be considered in future planning efforts, but would have no definitive or binding effect on federal lands under federal law.

2.A. Are there any producing oil and gas wells in areas C, D, and F on the maps that the BLM provided?

The following oil/gas developments are found in areas C, D, and F, all of which are located in the Rawlins Field Office.

- | | |
|-------------------------------|-------------------------------|
| 1 APD | 1 Expired Permit |
| 1 notice of intent to abandon | 3 Plugged and Abandoned wells |

In addition, the following chart depicts leases within areas C, D, E and F, and the WSA.

	Total Acres	BLM Leased	BLM Not Leased	State Leased	State Not Leased
Total Area (does not include private or WSA acres) 59 leases (three leases occur in more than one Area) 79% of area	36,434 acres	28,808 acres	7,543 acres	3 acres	80 acres
Area C 25 leases 82% of area	10,573 acres	8,726 acres	1,847 acres	No state parcels	
Area D 11 leases 88% of area	7,540 acres	6,642 acres	898 acres	No state parcels	
Area E	13,426 acres	10,136 acres	3,207 acres	3 acres	80 acres

20 leases 75% of area					
Area F	4,895 acres	3,304 acres	1,591 acres	No state parcels	
6 leases 67% of area					
Adobe Town WSA (Rawlins only)	34,165 acres	2,244 acres	31,922 acres	N/A	N/A
7 leases 6.5% of area					

2.B. What affect would the designation have on the active lease on the Rawlins side?

A state designation that appears to conflict with BLM planning decisions could create confusion for active lease holders, state decision makers (when reviewing development proposals), and in the eye of the public since the BLM must manage public lands in this area according to the governing land use plan and will continue to allow development of valid existing rights.

There would be no effect on active Federal leases from the proposed designation. The BLM is required to manage public lands and valid existing rights according to federal laws, regulations and according to its land use plans. Those laws preempt a state designation.

3. What affect would the designation have on the BLM's study process? Areas C, D, and F.

WSAs are managed by BLM to protect wilderness characteristics. The nearly 86,000 acre Adobe Town WSA will continue to be managed to protect wilderness characteristics, subject to valid existing rights, until Congress designates the area as Wilderness or releases it from WSA status.

The rare/uncommon proposal area is managed according to governing land use plans pursuant to applicable Federal Laws, including the Federal Land and Policy Management Act. Land use plan decisions are made after careful consideration of all resources and proposed uses of an area and with the benefit of public participation. The BLM is actively managing for the following resources and uses in this area:

1. The Adobe Town Herd Management Area supports one of the largest wild horse herds in Wyoming. The herd is managed according to the Wild Horse and Burro Act.

2. Numerous cultural resources are present which relate to prehistoric American Indians. These resources are managed according to the Archeological Resources Protection Act and other cultural resource protection laws in coordination with the Wyoming State Historic Preservation Office.
3. Scientific interest in the paleontology of the Adobe Town WSA is high since the Washakie Basin of which the Adobe Town WSA is a part, is one of the most noted paleontology areas in North America.
4. Dispersed recreation opportunities including hiking, backpacking, rock hounding, photography, wild horse viewing, and primitive camping, and hunting. Motorized activities are limited to designated and existing routes and include travel to access the area, driving for pleasure and some ATV use.
5. Active oil and gas activity and developments outside of the WSA.
6. Livestock grazing and range improvements supporting grazing activities.
7. Wildlife habitat, managed according to the Migratory Bird Treaty Act and the Endangered Species Act. BLM manages wildlife habitat in coordination with the Wyoming Game and Fish Department.

In addition, the following protections are in place in portions of the area:

1. Protection of wilderness characteristics in the WSA (VRM Class I and Designated Routes)
2. VRM Class II (highly restrictive visual classification)
3. VRM Class III (some visual classification protections)
4. Avoidance of steep slopes (slopes greater than 25%) and highly erosive areas when considering development proposals
5. Prohibition on recreation developments
6. Limitation on interpretive signing
7. Protection of wildlife, geologic, cultural, watershed, scenic, and scientific values (paleontological and cultural)
8. Mineral activity will be considered outside the WSA provided mitigation can be applied to retain resource values
9. A paleontological survey is required prior to surface disturbing activities outside the WSA
10. Motorized vehicle use limited to existing routes (as identified in route inventory)

Areas C, D, and F are not designated as a BLM Wilderness Study Area (WSA), are not managed to protect wilderness characteristics, and are not recommended by BLM for designation as wilderness. BLM recently re-inventoried these areas for wilderness characteristics based in part on a petition by BioDiversity Conservation Alliance. BLM found these areas to contain primitive and unconfined recreation opportunities, solitude and naturalness (called wilderness characteristics), however, BLM determined that the areas' wilderness character could not be

maintained. This is due to the number of valid existing rights held in the area (79% of the re-inventoried areas are held under active leases). The decision to manage areas to maintain wilderness characteristics or for other uses is made in applicable land use plans.

The Rawlins land use plan is currently under revision with completion of the plan expected in early 2008. This plan is being crafted by taking all resources and proposed uses into account. The plan has the benefit of public participation including cooperating agencies (state, counties, other agencies) and the public (community partners, special interest groups, permittees/leaseholders and the general public).

3. Clarification of the access area to the proposed designation area?

RAWLINS:

Approximately 94 miles of roads within Areas C, D, E, F

Approximately 67 miles of two tracks

Approximately 24 miles of BLM roads (*BLM road 3311, 3318, 3319, 3330, 4411*)

Approximately 3 miles of oil and gas roads

Motorized use is limited to these identified existing routes. These figures represent administrative access. Lack of legal access across private lands may preclude travel across public lands.

4. What is the best case and worst case scenario from both sides in the designation?

Any new land use proposals will undergo an environmental review which includes opportunities for public input. Nevertheless, BLM must continue to manage the rare/uncommon proposal area according to WSA policy, the approved land use plans, and pertinent federal laws and regulations, including those that require BLM to honor valid existing rights.

5. What are the pros and cons of designating the wilderness study area?

The BLM recognized and has been protecting wilderness values of the nearly 86,000 acre WSA since the early 90's. BLM will continue to protect the wilderness values of the WSA, subject to valid existing rights, until Congress either designates the area as wilderness or releases it from WSA status.