



Wyoming Wilderness Association

Environmental Quality Council (EQC)
122 West 25th St.
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Cheyenne, WY 82002

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Dear EQC:

Terri A. Lorenzon, Director
Environmental Quality Council

I have spent the last 40 years of my life in Wyoming. My father's family pioneered in the Bighorn Basin and we grew up appreciating the desert, high plains landscapes of Wyoming.

I have always know that there is a sense of freedom and beauty if you can get back into a place like Adobe Town and get away from the industrial development of Wyoming. There is no place in Wyoming like Adobe Town, and it would encourage me greatly if the Environmental Quality Council would recognize the Rare and Uncommon Landscape qualities and have the vision to designate Adobe Town, the Crown Jewel of the Southwest Wyoming desert wilderness.

I traveled into Adobe Town by myself one year and I was instantly enchanted, first, by the remoteness, second by the spooky badlands formations, spires, castle rocks and weird plant life. Then I was immediately soothed by the immense vistas—from The Haystacks where I camped in the northern section, I could see all the way to Colorado, with no development in view, no sounds but the chirps of flocks of sage thrushes and wrens. This place brings out the explorer's curiosity, which led me into deep gorges, canyons of sandstone and mud formations that beguiled the mind. How were they ever formed, how could that rock balance there, how would this place look in torrential rain? Every alley of eroded badlands, led to another maze to be followed. I seriously found myself happily lost in the Adobe Town maze, until I climbed out onto a pinnacle and could find my way back. That is the true definition of wilderness—a place that provides an opportunity for solitude, to get lost in, and is essentially untrammled by man. Adobe Town is the most beautiful and astonishing desert wildernesses in Wyoming. It rivals any Utah national monument and in fact, Adobe Town should become protected from all development to preserve this treasured place.

Adobe Town is an extremely Rare and completely Uncommon landscape. This area has the most unusual geologic formations while provided habitat for a large diversity of wildlife unparalleled in Wyoming. It contains outstanding prehistoric, historic and geologic values, and was a treasured place for Native Americans.

As an artist and photographer, I revel in, as do many Wyoming citizens, the deep canyons and sharply eroded badlands with a vast array of coloration from pastels to deep reds contrasting with the softer greens of juniper, pinyon and sage covered mesas and fragile watersheds—a true artist's paradise. Adobe Town represents the most spectacular and remote set of badlands and geological formations in the state.

As high and dry as this region is, it still supports a vast array of rare and sensitive wildlife species such as burrowing owls, cliff chipmunk, pinyon mouse, Merriam's shrew and ringtails. These small mammals provide a significant prey base for many of the raptor species, including prairie falcons and golden eagles, which inhabit the cliff formations occurring throughout this area. Big game species such as mule deer, pronghorn antelope and elk as well as badgers, fox, are dependent on these windswept lands for their survival. Also unique to these

areas are ancient 300 to 400 year old juniper and pinyon pine stands that are rare this far north.

Significant archaeological and paleontologic artifacts have been discovered in Flaming Gorge Country. The remains of several prehistoric cultures dating back to 9,000 years ago are represented by tepee rings and many cultural artifacts. Fossils of long extinct mammals, reptiles, and invertebrates erode from beds throughout the area. Two of the most notable finds of rhinoceros-like and tapir-like creatures were taken from Adobe Town.

The BLM began the wilderness review in accordance with the requirements of Section 603(c) of the Federal Land Policy and Management Act dated October 21, 1976. The Act mandated that within 15 years the BLM would inventory and study its lands for their wilderness suitability and that based on this review, the Secretary of Interior would forward his wilderness recommendations to the President. Minimum standards for the evaluation of BLM lands in Wyoming were set by Congress in Section 2 (c) of the Wilderness Act of 1964. The Wyoming BLM recommended 42 wilderness study areas (WSAs). The final inventory decision for most Wyoming WSAs was made in May 1981. The Adobe Town Draft Environmental Impact Statement was filed in May 1983. Final EIS filed in January of 1988.

The 1991 and 2001 Citizens Proposal included the following summary of acreage:

Summary

Initial Intensive Inventory:	109,878 acres
Wilderness Study Area:	85,710 acres
BLM Recommendation:	10,920 acres
Citizens' Wilderness Proposal:	180,000 acres

Beginning in 1989 through to the publication in 1994, I spent much time working on the Citizen's Wilderness Proposal for BLM lands. I could not understand how the BLM could take a place like Adobe Town and reduce it to a mere fraction of its initial inventory of roadless/wilderness quality lands. After a bit of research with BLM employees and documents, I concluded that the BLM did not in fact look at the wilderness qualities in themselves and of themselves as required by the evaluation process, but looked at the potential for conflict from industry and kept as much of the land out of WSA recommended status as they could.

It took the eyes of Wyoming citizens Scott Thomas, John Zelazny and Larry Mehlhaff and later Erik Molvar, to look freshly at the Adobe Town landscape for its pure wilderness qualities, to look at each two-track, document its use or lack of use with photographs and forms, to envision Adobe Town as a protected wilderness and make the final assessment that, indeed, 180,000 contiguous acres retained wilderness qualities. Petitions and letters, proposals and comments were sent to the BLM from over 50,000 people who wanted to see Adobe Town kept intact as wilderness in the many public processes from the BLM's 15 year process of Wilderness evaluations to the Great Divide Resource Area's Resource Management Plan.

Lands designated as wilderness are withdrawn from mineral entry and leasing, subject to rights associated with valid claims and leases existing at the time of designation. How wilderness designation would impact exploration for and development of mineral resources was an issue in seven of the nine studies. Many of the WSAs have the potential for undiscovered mineral resources. This should be of interest to the EQC in their determination for Rare and Uncommon status for Adobe Town, that Adobe Town has prevailed in retaining its wilderness qualities all these years, but the threats are imminent.

The Adobe Town WSA is part of the BLM's Washakie Basin proposed Natural Landmark. This designation is

bestowed upon areas with outstanding geological and ecological features. The spectacular landforms of Adobe Town give the area scenery like no other in North America. Hikers here may explore towers, grottoes, caves, and mazes. Former Secretary of the Interior under Ronald Reagan, Don Hodel said that the "wilderness" Christ wandered into as described in the New Testament "looked like this area" which might even be "more akin to wilderness" than trees and mountains.

Adobe Town is also one of the three most important paleontologic areas in North America (Univ. of Chicago). Fossils of long-extinct mammals, reptiles, and invertebrates erode from beds throughout the area. Two of the most notable finds are of rhinoceros-like and tapir-like creatures. The paleontological resources have been almost continuously studied since the time of the Hayden Survey in the mid 1800's. Many specimens from the Washakie Basin are now in museums such as the Chicago Field Museum of Natural History. Locally, both the University of Wyoming and Western Wyoming College collect specimens from the WSA.

This area has been occupied by humans almost continuously for the last 12,000 years, as shown by an estimated 4000 cultural resource sites, including rock shelters, quarries, shelter rings, and firepits (BLM 1987).

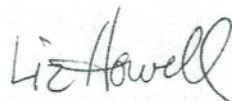
It is universally known for its trophy antelope and also contains trophy mule deer. It also includes Wyoming's largest herd of wild horses. Due to an abundance of jack rabbits and other prey, this unit is prime raptor habitat. Golden eagles, prairie falcons, red-tailed hawks, and ferruginous hawks - a candidate species for threatened or endangered listing - all nest in these badlands. Burrowing owls - a state Priority Species in Need of Special Management due to its rarity - use the area (Ritter 1991). A USFS Region 2 Sensitive species list designates the burrowing owl as Sensitive, and BLM may want to consider this status in management planning for this area (WNDD, 1993). Horned toads, rattlesnakes and other small desert dwellers also abound.

Two plant species, both candidates for Federal threatened or endangered listing are Gibben's beardtongue and a miners candle are found in this area. Other plants of high priority classified as a State Sensitive Species (due to the rarity of occurrence in the State), also found in the Adobe Town region are a fleabane, cowpen crownbeard, Colorado bedstraw, sheepcreek beardtongue, threadleaf rubber rabbitbrush, western hop-sage, and Torrey's desert dandelion (WNDD, 1993).

The Wyoming Natural Diversity Database notes that the BLM maintains an enclosure for protection of the Gibben's Beardtongue near Cherokee Rim in the region of Adobe Town (WNDD, 1993).

To summarize, the wilderness attributes of this area would most likely be virtually destroyed if it is not protected as wilderness and recognized as a Rare and Uncommon Landscape by the EQC. I appreciate this opportunity to comment as the Executive Director of the Wyoming Wilderness Association and a citizen of Wyoming. Our organization will testify at the EQC Hearing on October 25, 2007 in Rock Springs, represented by Mike Evans, WWA Governing Council member. Please consider these comments as in addition to Mike Evan's.

Sincerely,



Liz Howell, Executive Director