

FILED

BEFORE THE ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING

OCT 24 2007

Terri A. Lorenzon, Director
Environmental Quality Council

In the Matter of the Petition of Biodiversity Conservation)
Alliance for the Designation of "Adobe Town" As Very) EQC Docket No. 07-1101
Rare and Uncommon)
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VERMILLION RANCH LIMITED PARTNERSHIP COMMENTS

Vermillion Ranch Limited Partnership (VRLP) submits the comments to oppose the Petition filed by the Biodiversity Conservation Alliance (BCA) to designate the Adobe Town area as rare or uncommon under Wyo. Stat. §35-11-112(a)(v). VRLP operates a ranch in Wyoming, Colorado and Utah and holds grazing permits very near the land identified in the Petition. VRLP is also a member of the Rock Springs Grazing Association.

VRLP supports the comments filed by RSGA, Sweetwater County, and the Sweetwater County Conservation District. VRLP would also express the concern that a rare or uncommon designation would interfere with or burden removal of wild horses from the Adobe Town area.

Wild horse removal requires flyovers, motor vehicles, and structures to trap the horses in narrow canyons. Removal is absolutely necessary to protect rangeland resources. The wild horse herds increase at the rate of about 18% to 22% a year. If regular removals do not occur, the horse herds outgrow the range capacity.

On many occasions, wild horse removals are appealed on the basis that the National Environmental Policy Act (NEPA) analysis is inadequate. A rare or uncommon designation increases the already significant burden to completing the environmental analysis needed to remove the wild horses. The rare or uncommon designation would be another issue to address or another issue that would justify delaying wild horse removal.

VRLP urges the council to deny the petition as unnecessary.

October 24, 2007.

/s/ Constance E. Brooks
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