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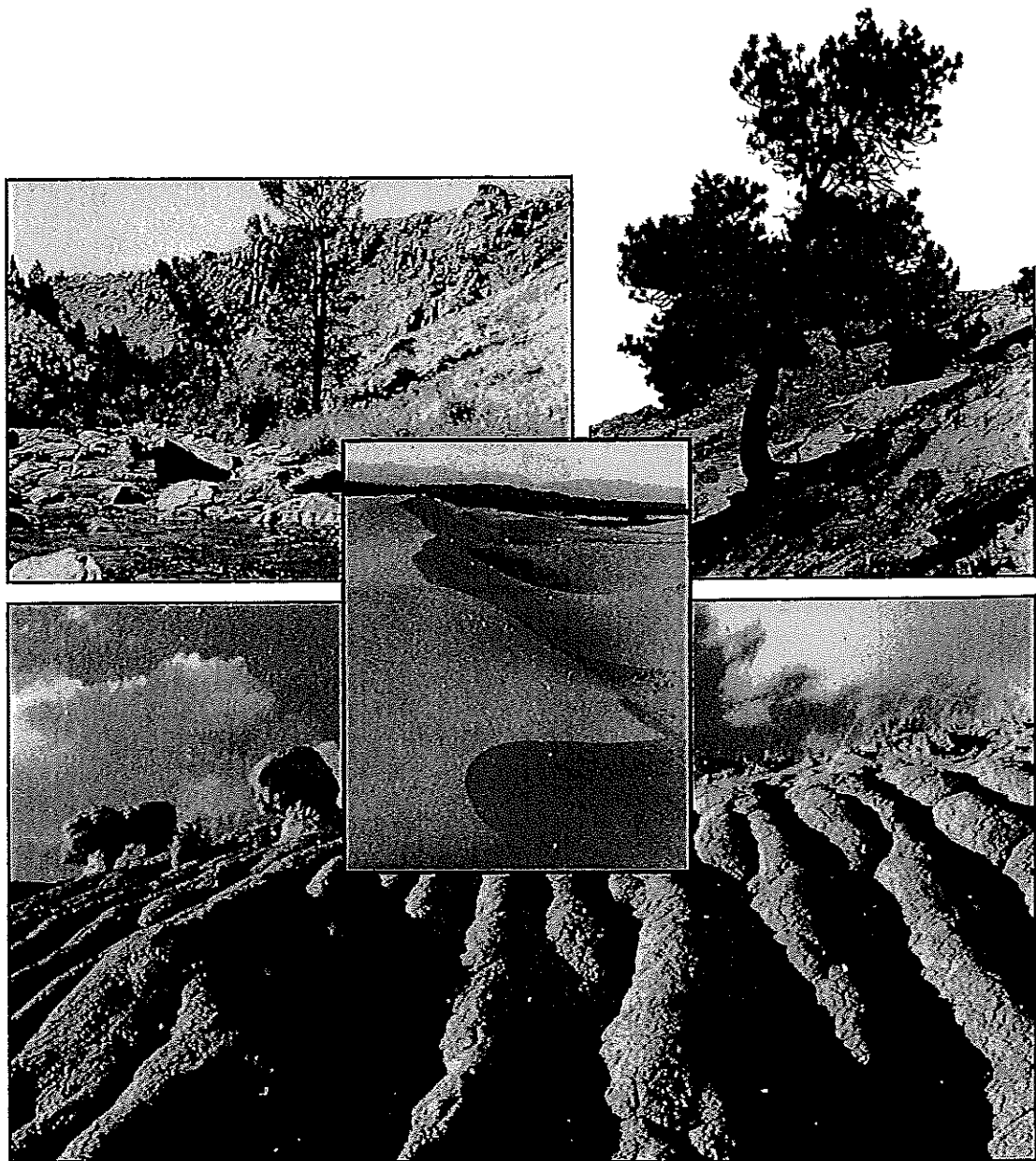
Wyoming State Office

September 1991



# Wyoming Statewide Wilderness Study Report

## Wilderness Study Area Specific Recommendations



Volume II

EXHIBIT

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### Local Social and Economic Considerations

Local social and economic considerations were not an issue in the EIS. There were no impacts to the local economy or social character identified during the study of this WSA.

### Animality of WSA - Specific Public Comments

**Inventory:** During the inventory phase, nine comments were received on the Whiskey Mountain WSA. Four supported inclusion of this unit as a wilderness study area and five were opposed. All of the comments regarding this unit were general in nature and none were carried forward to the study phase to assist in identifying study issues or alternatives.

**Draft EIS:** During formal public review of the draft EIS (released in October, 1988), a total of 51 comments, both oral and written, were received. Of those, 20 oral statements were received at public hearings held in Riverton and Dubois, Wyoming in December, 1988. The remaining 31 comments were written responses to the draft EIS. Comments received during the draft EIS review generally favored nonwilderness designation for the Whiskey Mountain WSA.

Of all the comments received, four were from federal agencies and seven were from state agencies. No objections were raised by the federal agencies. EPA's review did not identify any potential environmental impacts requiring substantive changes to the proposal. They also indicated that the draft EIS adequately set forth the impacts of the preferred alternative for the WSA. No state agencies expressed disagreement with the proposed action for the Whiskey Mountain WSA, which is nonwilderness designation. Three state agencies, the Wyoming Game and Fish Department, the Geological Survey of Wyoming, and the Wyoming Travel Commission favored nonwilderness for the Whiskey Mountain WSA. The Office of the Governor also concurred with the proposed nonwilderness designation. He further indicated that the rationale for maintaining the WSA as nonwilderness appears sound.

Comments were received from one local government, the Town of Dubois. The town supports non-wilderness for the Whiskey Mountain WSA. They would like to see no OHV use and feel the area should be managed for protection of the Bighorn Sheep.

The public has provided comments throughout the wilderness review process on this WSA. The predominant feeling is that the area should be given protection but not designated as wilderness because the designation would restrict flexibility needed to manage the bighorn sheep habitat including habitat improvement projects such as land treatments and sheep trapping.

### ADOBE TOWN WILDERNESS STUDY AREA (WSA)

#### 1. WSA STUDY AREA -- 85,710 ACRES

The Adobe Town WSA (WY-030-401 and WY-040-408) consists of a single study area administratively identified with two WSA numbers because the area is separated by the boundary between the Rawlins and Rock Springs Districts. The Adobe Town WSA includes 82,350 acres of BLM lands, 3,360 acres of split estate lands and 1,280 acres of state land (see Table 1). The WSA is located in southeastern Sweetwater County, 25 miles south of Mammoth, Wyoming. The WSA is bounded on the north by the checkerboard land pattern and the Manual Gap road, on the west by the Adobe Town Rim road, on the south by the Shell Creek road, and on the east by the Willow Creek road (see Map 1).

The WSA was studied under Section 603 of the Federal Land Policy and Management Act (FLPMA) and was included in the Adobe Town-Ferris Mountains Wilderness Environmental Impact Statement filed in January 1988. There were four alternatives analyzed in the EIS including all wilderness. No wilderness, partial wilderness which is the recommendation of this report that would designate 10,920 acres as wilderness and release 74,790 acres for uses other than wilderness, and another partial wilderness in which 16,280 acres would be designated as wilderness and 69,430 acres would be released for uses other than wilderness.

The 10,920 acres recommended for wilderness includes most of the core of the Washable Basin, an ancient inland sea. This portion of the WSA is a very colorful and rugged desert badland area virtually untouched by human activity. The maze of badlands formations, mesas, and buttes combine with brilliantly colored rock strata to create spectacular canyonland scenery. Shell Creek Rim, in the core of the area recommended for wilderness, contains some of the most unique and extensive badlands formations in Wyoming.

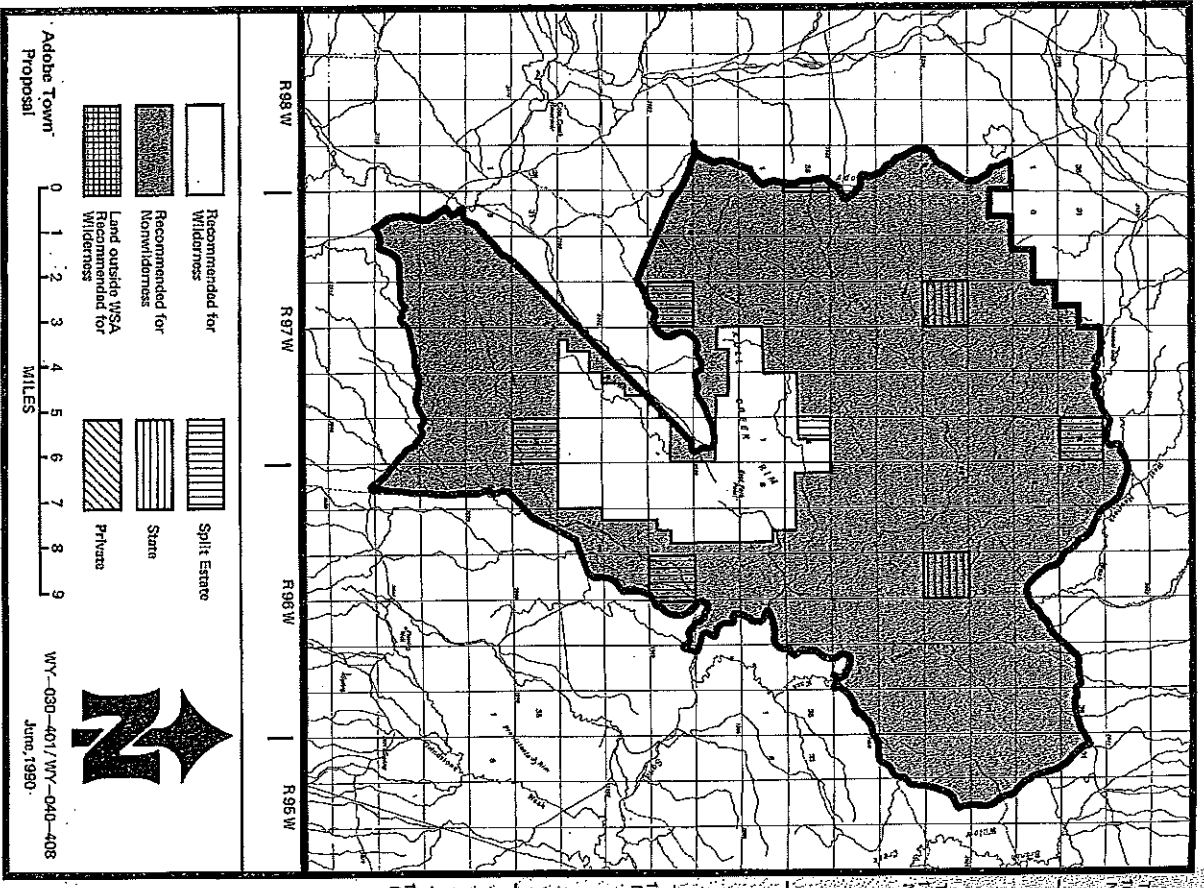


TABLE 1 - Land Status & Acreage Summary of the Study Area

Within Wilderness Study Area	
BLM (surface and suburface)	82,350
Split-estate (BLM surface only)	3,360
Inholdings (State, private)	1,280
Total	86,990
Within the recommended wilderness boundary	
BLM (within WSA)	10,520
BLM (outside WSA)	0
Split Estate (within WSA)	400
Split Estate (outside WSA)	0
Total BLM Land Recommended for Wilderness	10,920
Inholdings (State, private)	0
Within the Area Not Recommended for Wilderness	
BLM	71,830
Split Estate	2,960
Total BLM Land Not Recommended for Wilderness	74,790
Inholdings (State, private)	1,280

2. RECOMMENDATION AND RATIONALE--10,920 acres recommended for wilderness  
74,790 acres recommended for nonwilderness

The recommendation for this WSA is to designate 10,920 acres (10,520 acres Federal and 400 acres split estate) as wilderness and release 74,790 acres for uses other than wilderness (Map 1). The All Wilderness alternative is the environmentally preferable alternative as it would result in the least change to the natural environment. The recommendation would be implemented in a manner which would use all practical means to avoid or minimize environmental impacts. Appendix 1 lists all inholdings and split estate tracts and provides additional information on acquisition of inholdings and split estate minerals.

In recommending the 10,920-acre portion of the WSA for wilderness, the exemplary quality of the area's wilderness values and the opportunity to add an ecosystem not presently part of the wilderness system were key considerations. Because of the lack of man-made intrusions in the portion of the WSA recommended for wilderness designation, its naturalness is considered exceptional. The Skull Creek Rim area contains virtually no evidence of modern man. The wilderness inventory judged this portion of the WSA to be natural in appearance.

Designation of this portion of the WSA as wilderness would add an ecosystem not currently represented in the wilderness system. The entire 10,920 acres recommended for wilderness lie within the Wyoming Basin/Saltwash-grasswood ecosystem. No designated wilderness areas contain this ecosystem.

Because the recommended portion of the WSA was part of an inland sea, it is rich in paleontological and archaeological resources. The Adobe Town area is known as one of the three most valuable sites in North America for certain types of mammalian fossils. Archaeological resources within the area are estimated to represent continual human occupation for the past 12,000 years.

A wilderness designation would not conflict with other resources uses in the 10,920 acres recommended for such a designation. Grazing of the area will be allowed to continue. The WSA as a whole has a high potential for natural gas production. It is estimated that the reserves within the WSA are in excess of one trillion cubic feet. There are no oil and gas leases or mining claims within the 10,920 acres recommended for wilderness. The recommendation for this WSA is projected to result in the recovery of approximately 80% of the total natural gas reserves within the WSA as compared to an 85% recovery rate under the no wilderness alternative. Thus, conflicts with wilderness management would be minimal.

The remaining 74,790 acres were recommended for nonwilderness because of the area's high potential for the development of natural gas. The topography and drainage patterns of this portion of the WSA are not naturally limiting to development. Given the WSA's high potential for natural gas, it is likely that development would indeed occur here, with a potential for wells located throughout the nonwilderness portion. Currently there is no oil and gas activity in the area. Were any exploration or development to occur, the activities would be managed to minimize environmental impacts. Construction activities would be limited to specific times of the year to protect wintering wildlife and nesting raptors. Erosion and impacts to water quality would be minimized by limiting facilities to areas away from live water and slopes in excess of 25%.

### 3. CRITERIA CONSIDERED IN DEVELOPING THE WILDERNESS RECOMMENDATIONS

#### Wilderness Characteristics

A. Naturalness: The Adobe Town WSA is predominantly natural, with few human impacts. Skull Creek Rim, in the core of the recommended area, is a very colorful and rugged desert badland area, which consists of a series of highly eroded drainages and colorful badland rims. To the north of Skull Creek Rim is Monument Valley and Adobe Town Rim. These areas also contain badlands and formations similar to Skull Creek, but are more dispersed. To the east (the majority of the nonwilderness area) is a broad, relatively undisturbed plain that is covered with stabilized sand dunes and alluvium. The few man-made intrusions in the WSA are minor and consist of activity associated with past oil and gas explorations. There are several old livestock watering reservoirs, and two abandoned wild horse traps. Those intrusions are not noticeable and have a minimal impact on the total area.

B. Solitude: The Adobe Town WSA contains outstanding opportunities for solitude. The WSA's rugged badland rims and numerous canyons provide ample opportunities to avoid the sights and sounds of other visitors. The open desert plain, with its expanses of sagebrush and open scenic vistas, projects a feeling of vastness and solitude. Encounters among visitors would be more likely in this portion of the WSA, however, because of the relatively flat terrain.

C. Primitive and Unconfined Recreation: The Adobe Town WSA, with its large size and varied topography, contains outstanding opportunities for primitive and unconfined recreation. The majority of the WSA provides opportunities for unconfined freedom of movement due to the open rolling hills and numerous drainages. Opportunities for hiking, backpacking, sightseeing, horseback riding, hunting, nature study, scientific study, and photography are available to the visitor. The outstanding scenic quality of this WSA enhances the recreational values.

D. Special Features: The WSA is nationally known for the educational and scientific study of paleontological resources. Fossil remains of mammals are numerous and widely distributed throughout the area. Two notable mammalian fossils found in the area are the Uintathere and the Titanothere. The Uintathere was a large mammal about the size and configuration of an African rhinoceros. The species of Titanothere found in the WSA was a tiger-like mammal, about 40 inches in height. This area has been identified as one of the premier sites in North America for paleontological resources.

Significant archaeological resources are found throughout the WSA, representing continuous occupation by man from Paleo Indian through late Prehistoric periods, that is, for the past 12,000 years. The cultural site density of the WSA is estimated to be 30 surface sites per square mile, which is unusually high.

#### Diversity in the National Wilderness Preservation System

A. Expanding the diversity of natural systems and features as represented by ecosystems and landforms: Wilderness designation of the 10,920 acres of the WSA recommended in this report would add an ecosystem not presently represented in the National Wilderness Preservation System. There are only four other BLM areas in the state under study with this ecosystem, and the example in this WSA is judged to be the most natural of the areas studied in this state. The remaining 74,790 acres are within an ecosystem already represented in the wilderness system in one area in Wyoming. This information is summarized in Table 2.

Table 2  
Ecosystem Representation

Bailey-Ruchler Classification Domain/Province/PNW	NWPS Areas		Other BLM Studies Areas	
	ACRES	PERCENT	ACRES	PERCENT
Dry Domain/ Wyoming Basin Province/ Saltbush-grasswood	0	0	4	94,549
	NATION WIDE			
	0	0	4	94,549
	WYOMING			
	0	0	4	94,549
Dry Domain/ Wyoming Basin Province/ Sagebrush Steppes	1	67,026	16	230,031
	NATION WIDE			
	1	67,026	16	230,031
	WYOMING			
	1	67,026	16	230,031

B. Assessing the opportunities for solitude or primitive recreation within a day's driving time (five hours) of major population centers: The WSA is within a five hour drive of one major population center. Table 3 summarizes the number and acreage of designated areas and other BLM study areas within five hours drive of the population center.

Table 3  
Wilderness Opportunities for Residents  
of Major Population Centers

Population Center	NWPS Areas		Other BLM Studies Areas	
	ACRES	PERCENT	ACRES	PERCENT
Casper, WY	27	4,080,891	32	379,949

C. Balancing the geographic distribution of wilderness areas: The Adobe Town WSA would contribute to balancing the geographic distribution of areas within the National Wilderness Preservation System. Although there are several designated wilderness areas in south central Wyoming and north central

Colorado (78,870 acres in south central Wyoming and 312,483 acres in north central Colorado, totaling 391,353 acres in 12 units), there are no wilderness areas in southwest Wyoming or northwest Colorado. Designation of the Adobe Town WSA as wilderness would help fill this void. Manageability (the area must be capable of being effectively managed to preserve its wilderness character).

The portion of the WSA preliminarily found suitable for wilderness is manageable as wilderness.

The portion of the WSA not recommended for wilderness would be manageable as wilderness. However, there are about 5,800 acres of pre-FIPWA leases within this portion of the WSA and the terrain and drainages do not necessarily limit development. The lease holdings are grouped in three geographic areas: (1) the southwest portion of the WSA along the southern part of Monument Valley; (2) the northwest part around Adobe Town Rm; and (3) scattered parcels in the northeast part of the WSA. Given the high potential for natural gas in the WSA, it is quite probable that development would occur, with wells distributed throughout this portion of the WSA. Assuming a relatively even distribution of these wells throughout the nonwilderness portion of the WSA, the slight and sounds of the machinery, access roads, and vehicles would necessarily threaten wilderness values over the long term. This would make wilderness management extremely difficult.

**Energy and Mineral Resource Values**

The U.S. Geological Survey and U.S. Bureau of Mines prepared a mineral assessment for that portion of the Adobe Town WSA that is recommended for wilderness designation (U.S. Geological Survey Bulletin 1757-H, 1990). The results of that report provide the basis for the following information.

The potential for accumulations of natural gas in the Adobe Town WSA is considered to be high. It is estimated that the Adobe Town WSA is underlain with approximately 1-2 trillion cubic feet of natural gas.

No drilling has been done in the 10,920 acres recommended for wilderness, but 12 holes have been drilled in nearby areas. Three of these wells produced natural gas, ranging from 1,200 to 3,700 MCF (million cubic feet) of gas per day. All three of these wells were relatively deep (more than 10,000 feet). There are no wells producing gas within the entire WSA at this time.

The status of the oil and gas leases in the Adobe Town WSA has changed significantly since the final EIS was completed (see Map 7, Adobe Town-Ferris Mountains Final EIS) and from that shown in the U.S.G.S./B.N. Mineral report. The current status is reflected on Map 2. At the time that the EIS was written, there were two oil and gas units within the Adobe Town WSA, with a unit being a contiguous group of leases designed to drain the oil and gas reserves from a known reservoir in the most efficient manner.

Once a well is drilled and proves to have commercial quantities of oil or gas, a "participating area" (PA) is set up around the well. The PA represents the area proven to be capable of producing in commercial quantities. The units automatically contract to the PA five years after the PA is established. If diligent drilling within the unit does not occur. In the case of the Adobe Town NSA, the units contracted to the PAs and the pre-FLPMA leases being held by the units thus expired.

In addition, several other oil and gas leases have expired. There are now 5,800 acres of pre-FLPMA leases within the NSA being held by production or as participating areas. The remainder is either unleased or covered by post-FLPMA leases.

There are no mining claims in the Adobe Town NSA. The area was withdrawn from mining location by Executive Order 5327, April 15, 1930. The entire study area has low potential for undiscovered uranium, coal, zeolites, oil shale, and metallic minerals.

**Impacts on Other Resources**

The following comparative impact table (Table 4) summarizes the effects on pertinent resources for all the alternatives considered including designation or nondesignation of the entire area as wilderness.

TABLE 4  
COMPARATIVE ANALYSIS OF IMPACTS  
ADobe TOWN NSA

Issue Topics	Proposed Action (Partial Wilderness)	No Wilderness	Partial Wilderness-2	All Wilderness
Wilderness Values	Naturalness and solitude lost on 75,110 acres in long term. Wilderness values retained on 10,600 acres.	Naturalness and solitude lost on 85,720 acres in long term. No legal protection of wilderness values on 85,710 acres.	Naturalness and solitude lost on 70,710 acres in long term; includes 1,280 acres in partial wilderness boundary. Wilderness values retained on 15,000 acres.	Naturalness and solitude lost on 39,300 acres in long term due to development of pre-FLPMA leases. Wilderness values retained on 46,410 acres.
Energy and Mineral Resources	Eighty percent of gas recovered (80 billion cubic feet); 74,790 acres open to oil and gas leasing; 10,920 acres closed to oil and gas leasing.	Eighty-five percent of gas recovered (95 billion cubic feet); 85,710 acres open to oil and gas leasing.	Seventy-two percent of gas recovered (72 billion cubic feet); 69,430 acres of nonwilderness open to oil and gas leasing. 1,280 acres of wilderness open to oil and gas because of existing pre-FLPMA leases; 15,000 acres closed to oil and gas leasing.	Thirty percent of gas recovered (35 billion cubic feet). 39,300 acres open to oil and gas development because of existing pre-FLPMA leases; 46,410 acres closed to oil and gas leasing.
ORV Use	Twenty-five visitor-days annually displaced from 10,920 acres. Insignificant impacts due to better opportunities on nearby public land. ORV use limited to 490 miles of designated roads and trails on 74,790 acres.	Minor increase in vehicle accessibility; no significant impacts. ORV use limited to 520 miles of designated roads and trails on 85,710 acres.	fifty visitor-days annually displaced from 16,280 acres. Insignificant impacts due to better opportunities on nearby public land. ORV use limited to 440 miles of designated roads and trails on 69,430 acres.	Two hundred visitor days annually displaced from 85,710 acres; insignificant impact due to better opportunities on nearby public land.
Cultural Resources	Cultural resource surveys on 8,350 acres; 400 sites evaluated but destroyed. Sites on 10,600 acres would remain undisturbed.	Cultural resource surveys on 9,075 acres; 425 sites evaluated but destroyed.	Cultural resource surveys on 7,770 acres; 370 sites evaluated but destroyed. Sites on 16,250 acres would remain undisturbed.	Cultural resource surveys on 3,750 acres; 175 sites evaluated but destroyed. Sites on 82,000 acres would remain undisturbed.
Paleontological Resources	Adverse impacts to paleontological resources on 8,550 acres due to oil and gas activities. Beneficial impacts on 10,920 acres because sites would remain undisturbed.	Adverse impacts to paleontological resources on 9,075 acres due to oil and gas activities.	Adverse impacts to paleontological resources on 7,770 acres due to oil and gas activities. Beneficial impacts on 15,000 acres because sites would remain undisturbed.	Adverse impacts to paleontological resources on 3,750 acres due to oil and gas activities on pre-FLPMA leases. Beneficial impacts on 46,410 acres of post-FLPMA and unleased lands because sites would remain undisturbed.
Livestock Grazing	No impacts.	No impacts.	No impacts.	Increased difficulty in managing domestic sheep on winter range; may result in voluntary cecuse of 3,893 AUMs.

TABLE 4 Continued  
COMPARATIVE ANALYSIS OF IMPACTS  
ADOBE TOWN WSA

Issue Topics	Proposed Action (Partial Wilderness)	No Wilderness	Partial Wilderness-2	All Wilderness
Wildlife	No impacts to antelope. Mule deer displaced off of 40,000 to 76,790 acres, but can be easily accommodated in other areas.	No impacts to antelope. Mule deer displaced off of 85,710 acres, but can be easily accommodated in other areas.	No impacts to antelope. Mule deer displaced off of 70,710 acres, but can be easily accommodated in other areas.	No impacts to antelope. Virtually no displacement of mule deer.
Raptors	Out of a total of 22 ferruginous hawk nests, six to eight would produce fledglings.	Out of a total of 22 ferruginous hawk nests, six to seven would produce fledglings.	Out of a total of 22 ferruginous hawk nests, eight to ten would produce fledglings.	Out of a total of 22 ferruginous hawk nests, 12 to 13 would produce fledglings.

Local Social and Economic Considerations

Local social and economic considerations were not an issue in the EIS. There were no impacts to the local economy or social character identified during the study of this WSA.

Summary of WSA-Specific Comments

**Inventory:** During the inventory phase, 37 comments were received on the Adobe Town WSA. Twenty-seven supported inclusion of the unit as a wilderness study area, while ten opposed the unit's inclusion. Those who favored wilderness believed that the WSA had all the prerequisite wilderness characteristics necessary to qualify for wilderness study. Those opposed cited a desire to see the area managed for uses other than wilderness, the area's high potential for natural gas, and retention of motorized access.

**Draft EIS:** During formal public review of the draft EIS, a total of 42 comments, both written and oral, were received. Of those, three oral statements were received at a public hearing held in Rawlins, Wyoming; the remaining 39 comments were written responses to the draft EIS. In general, 24 comments favored wilderness designation for at least some of the WSA, and 13 favored no wilderness. Five comments addressed the relative merits of the EIS, but took no formal position on wilderness designation or non-designation.

Support for wilderness designation stemmed from a desire to protect some of the public lands from environmental destruction caused by the commercial exploitation of oil and gas. Opposition to wilderness designation was based on mineral potential and the desire to manage the area for uses other than wilderness. Of all the comments received, 4 were from Federal agencies and 8 were from state agencies. No comments were received from local agencies. Of the federal agencies, the Environmental Protection Agency indicated environmental reservations regarding the DEIS Proposed Action and suggested that the Partial Wilderness alternative (now called Partial-2) be given further consideration. The National Park Service and the Fish and Wildlife Service favored the all wilderness alternative. The Bureau of Mines preferred the No Action alternative. Of the state agencies, the Geological Survey of Wyoming, the Oil and Gas Commission, and the State Engineer's Office supported the DEIS proposed action of No Wilderness. The Department of Agriculture favored the No Action alternative. The Wyoming Recreation Commission supported the DEIS proposed action as long as protective measures for cultural resources were implemented prior to any project authorization. The Game and Fish Department supported the 16,280-acre Partial Wilderness Alternative as described in the draft EIS, and the Department of Environmental Quality (Water Quality Division) had no comment. In addition, the Governor's Office had no overall position regarding wilderness designation, but were opposed to inclusion of state-owned land or mineral estates in BLM WSAs.