

1792/1310 (040)
Haystacks Geophysical Project

September 13, 2001

Dear Reader:

Enclosed you will find the Decision Record and Finding of No Significant Impact which describes the Bureau of Land Management's decision for Veritas' Haystacks Geophysical Project proposal adjacent to the Adobe Town Wilderness Study Area (WSA). Hand-laying geophones within the WSA will be allowed as the activity meets the non-impairment criteria.

The environmental assessment was released for a 25-day comment period. Based upon comments, BLM prepared an errata (see Appendix A) which further clarifies the text in the environmental assessment. BLM received 437 comment letters. Appendix B provides a summary of comments received and BLM's response to them.

BLM appreciates the public's participation during preparation of the environmental analysis. The Decision Record can be linked from the Rock Springs website. The address for Rock Springs' website is http://www.wy.blm.gov/field_offices/rsfo/rs_home.html. Copies of this Decision are also available at the Rock Springs Field Office in Rock Springs. You may call Teri Deakins at 307-352-0211 to request copies. If you have questions about this action, please call Ted Murphy at 307-352-0321.

Sincerely,

/s/ John Mckee

Field Manager

Enclosure

**DECISION RECORD
FINDING OF NO SIGNIFICANT IMPACT
HAYSTACKS GEOPHYSICAL EXPLORATION PROJECT**

Introduction

Veritas GDC Land Inc. (Veritas) submitted a “Notice of Intent to Conduct Oil and Gas Geophysical Exploration Operations” to the Rock Springs Field Office in April 2001 to conduct geophysical operations on private, state, and federal lands in the Haystacks/Monument Valley area in southeastern Sweetwater County, Wyoming (Map 1). The project area covers approximately 133 square miles with about 82 square miles on public lands managed by the Bureau of Land Management (BLM).

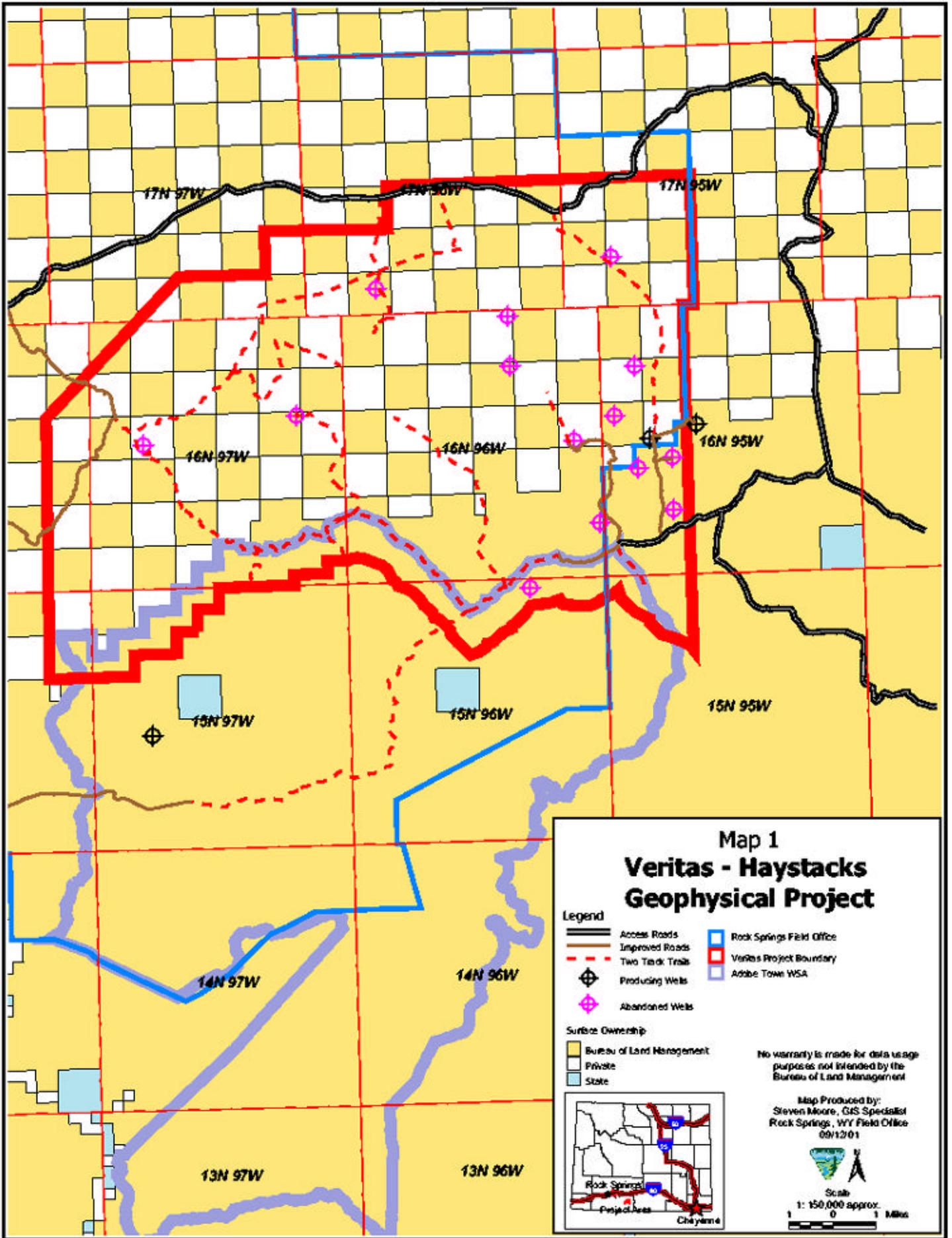
The following federal sections are affected by the proposal:

T17N R97W	Sections	32, 34, 36
T17N R96W	Sections	20, 22, 24, 26, 28, 30, 32, 34, 36
T17N R95W	Sections	20, 28, 30, 32
T16N R98W	Sections	12, 14, 24, 26, 36
T16N R97W	Sections	2, 4, 6, 8, 10, 12, 14, 16, 18, 20, 22, 24-28, 30, 32-36
T16N R96W	Sections	2, 4, 6, 8, 10, 12, 14, 16, 18, 20, 24-36
T16N R95W	Sections	4, 6, 8, 16-21, 28-33
T15N R98W	Sections	2, 12
T15N R97W	Sections	4-8
T15N R96W	Sections	1-5, 9, 10
T15N R95W	Sections	4-6

Alternatives Considered

The *Haystacks 3-D Geophysical Exploration Project Environmental Assessment* (WY-040-01-108, EA) analyzed two alternatives. Under the Proposed Action, Veritas proposes to conduct geophysical operations using a “shothole” method where truck, buggy, or portable drills would drill holes 60 feet deep. Each hole would be packed with 15 pounds of explosive material and then backfilled with the drill cuttings. Once the holes are drilled and refilled, geophones lines (receivers) would be laid on the ground to record the sound waves as the explosives are discharged. In order to get optimal data (accurate readings of subsurface geologic structures and stratigraphy) on private and leased federal lands located adjacent to the Adobe Town Wilderness Study Area (WSA), geophones would be hand laid approximately 1 mile into the WSA. Helicopters would be used to transport equipment (geophones) and personnel into the WSA. Operations are scheduled to start with approval of the Notice of Intent and be completed before November 15th.

The No Action Alternative analyzed the consequences of denying Veritas’ proposal. An alternative to eliminate any activity associated with geophysical operations within the WSA was considered but dropped from detailed analysis (see the EA for rationale).



Decision

Based upon the analysis contained in the aforementioned EA, the BLM approves Veritas' proposed action. Veritas may proceed with geophysical operations in the Haystacks/Monument Valley area once all appropriate clearances (e.g., cultural, paleontological) are obtained and the Notice of Intent is approved. Geophysical operations will be subject to the following list of measures.

1. Geophysical activity is prohibited on crucial big game winter range from November 15 to April 30. Exceptions to this stipulation must be requested in writing. Granting an exception must be approved in writing by the Authorized Officer and will be subject to consultation with the Wyoming Game and Fish Department.
2. To protect greater sage grouse and mountain plover: seasonal restrictions within a .25-mile radius from the greater sage grouse strutting ground would apply between February 1 and May 15. A controlled surface use (CSU) restriction would apply from February 1 through May 15 from 6:00 p.m. to 9:00 a.m. daily on the lek. Seasonal restrictions may be applied through July 31 within an additional 1.75-mile radius from leks to protect greater sage grouse nesting habitat. Areas within that radius, not used for nesting, can be excepted, provided actual nesting areas are not affected. Clearances would be required for mountain plover if activities occur between April 10 and July 10.
3. Geophysical operations would not be allowed within the area of affect as determined by BLM wildlife biologists based on U.S. Fish and Wildlife Service guidelines, of occupied raptor nests until hatchlings have fledged.
4. The geophysical operator shall maintain a safe operating buffer between the geophysical operations and the existing facilities. The width of the buffer would be determined by the facility owner/operator.
5. Any facilities damaged, destroyed, or removed under this geophysical exploration operation shall be immediately repaired or restored to the original condition or it shall be replaced with similar facility.
6. The geophysical operator shall make every effort to avoid disturbing or altering fences. Gates shall be used when possible. If a fence must be crossed, it will be cut, with H-braces built to support the existing fence. Upon termination of activities the temporary opening will be permanently wired shut and the wires stretched to their original tension.
7. The geophysical operator shall conduct all operations in conformance with the *Programmatic Agreement For Onshore Oil And Gas Geophysical Exploration By and Among The Bureau of Land Management, the Advisory Council on Historic Preservation, and Wyoming State Historical Preservation Officer*, approved on January 3, 1991. An exception to these requirements may be granted, if the action meets NHPA requirements.
8. The geophysical operator shall offset all off-road vehicle traffic over a 50-foot wide swath on either side of the staked seismic line, so that one vehicle does *not* drive the same path as another vehicle.
9. The geophysical operator shall clean up all diesel or hydraulic fluid spills, including the contaminated soils. All spill-related material shall be hauled to a Wyoming Department of

Environmental Quality (DEQ) approved disposal site. Spills resulting from ruptured pipelines or well casings shall be cleaned up as directed by DEQ and the facility owner/operator.

10. As directed by the Authorized Office, the geophysical operator shall rip or disc, and reseed all reclaimed well-pads, roads, and/or pipeline rights-of-way that are disturbed by the geophysical operations. All trash, flagging, lath, etc. will be removed and disposed of in an authorized location.
11. The geophysical operator shall conduct no vehicle operations during periods of saturated ground conditions when surface rutting would occur. Surface ruts deeper than 3 inches will be cause for the operations to cease.
12. The geophysical operator shall conduct no explosive detonation within 500 feet of springs, flowing wells, or Federally owned stockwater wells.
13. Geophysical operations on BLM-administered lands will not be allowed on or within 100 feet of riparian areas, unless they are frozen to a depth that is capable of supporting the geophysical exploration vehicles.
14. The Geophysical Operator shall conduct all drilling and hole plugging operations in strict conformance with all Wyoming Oil and Gas Conservation Commission requirements.
15. A 200-foot buffer for the vehicles will be maintained at all riparian/wetland areas when working in the summer season. The receiver lines can be laid through these areas in the customary manner.
16. A Class I cultural resource inventory will be conducted by a qualified cultural resource consultant for the entire project area. Upon receipt of the Class I inventory, the BLM, in consultation with SHPO, will determine the area of potential effect and could prescribe additional inventory and/or avoidance strategies.
17. A Class III cultural resource inventory will be conducted for public lands where vehicle operations will occur. Such inventory will not be required for areas covered by existing inventory providing that such inventories meet current standards. Class III inventories will be designed to locate and prescribe avoidance routes or other mitigation for all eligible cultural resource sites encountered. Any cultural or historic sites will be avoided by at least 100 feet. Avoidance will be accomplished by having a BLM-permitted archaeologist flag or otherwise mark drive arounds and places where vehicles may not be driven.
18. The operator will use helicopters in areas where there are steep slopes and erosive soils in and around the Haystacks.
19. In accordance with the RMP, the operator will (has) contracted with a permitted paleontological consultant to survey public lands within the MVMA and map all the documented fossil sites. All documented sites will be avoided.
20. The Overland Trail will be avoided regardless of land ownership. No shotholes will be allowed within 300 feet of the trail. In no case will there be any visual disturbance to the trail corridor (0.25 mile either side of the trail). Should the Overland Trail be crossed by vehicles, it will only be in those areas of previous disturbance such as a road or pipeline.

21. Based on consultation with representatives of Native American Tribal governments and based on their recommendation, shotholes or geophones could be moved if necessary.
22. Any cultural resource (historic or prehistoric site or object) discovered by the operator, or any person working on his behalf, on public or Federal land shall be immediately reported to the authorized officer. The operator shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the authorized officer. An evaluation of the discovery would be made by the authorized officer to determine appropriate actions to prevent the loss of significant cultural or scientific values. The operator would be responsible for the cost of evaluation and any decision as to proper mitigation measures would be made by the authorized officer after consulting with the proponent.
23. Any existing weed populations and areas of new infestations found during geophysical operations will be treated with herbicides as soon as practical to contain them or prevent their spread.
24. Driving on sand dunes should be avoided by vehicles, and shotholes should be offset to the interdunal swales where possible. Should any steep-sided drainages be encountered, they will not be crossed by any vehicles to protect banks. Low bank areas can be used for drainage crossings. Any surface damage should be repaired to the satisfaction of the BLM inspector as soon as practical after the completion of operations but no later than March 2002.
25. Veritas should encourage their personnel and subcontractors to wear hunter orange during the hunting season as a safety precaution.
26. Should operations not be completed and the operator need to resume operations in the spring, the operator will be required to complete surveys for special status species in accordance with BLM requirement.

Rationale for the Decision

My decision to approve the proposed action is based upon the following:

- S The Proposed Action is in conformance with the land use plan which allows for geophysical operations.
- S The Proposed Action is consistent with management objectives and actions for the Monument Valley Management Area which specifies the area as open to mineral exploration provided mitigation can be applied to retain the resource values. The measures identified under the section entitled *Decision* assure that the resource values found in the management area remain protected.
- S The Proposed Action, specifically use of helicopters to transport personnel and equipment and the hand-laying of geophones to record seismic waves, meets the non-impairment criteria for interim management of wilderness study areas (see *Interim Management Policy and Guidelines for Lands Under Wilderness Review*). Additionally, an Interior Board of Land Appeals (IBLA) decision affirmed a previous decision to allow the use of helicopters and the hand-laying of geophones within WSAs as meeting the non-impairment criteria (114 IBLA 333). The rationale provided by IBLA for affirming the decision states “. . . while Congress has prohibited the Secretary from issuing oil and

gas leases within a BLM WSA, 30 U.S.C. 226-2(a) (Supp V 1987), Congress also provided that . . . nothing in this section shall affect any authority of the Secretary of the Interior . . . to issue permits for exploration for oil and gas . . . by means not requiring construction of road or improvement of existing roads if such activity is conducted in a manner compatible with the preservation of the wilderness environment.” No construction of roads nor improvement to existing roads is proposed. In addition, certain public lands within the Adobe Town WSA have valid, existing leases although only a portion of an existing lease is within the area identified for hand-laying geophones (see Map 1).

- S BLM released the EA to the public on July 26, 2001 for a 25-day public review. No substantive comments, comments providing data to support claims, were received that require further analysis or selection of the No Action Alternative. Based on public comments, the text has been changed to correct or clarify the EA. These changes are shown in Appendix A, Errata. A summary of comments from the public and BLM responses are presented in Appendix B.

- S Since no listed, proposed for listing, or candidate (special status) species are anticipated to be affected by this action, concurrence from the U.S. Fish and Wildlife Service is not necessary. Other sensitive plant and animal species should not be negatively impacted by the action since important life events (e.g., rearing of young, seed set) have passed for the season. Should geophysical operations be delayed, mitigation to survey for such species would apply. Therefore, all species of concern (special status, sensitive, and other species of concern) would be protected.

- S Biodiversity Associates, et al., has submitted “A Citizens’ Wilderness Inventory of Adobe Town” as new information. A review and field check of this information will occur as time and workloads allow. BLM has not verified that wilderness characteristics do or do not exist in the area inventoried in the submission. However, the proposed action will not cause irreversible effects or undue or unnecessary degradation to the resources in the project area, including any potential wilderness characteristics (size, roadless, naturalness, solitude or a primitive and unconfined type of recreation, supplemental values) that may occur. Therefore, it is not necessary to change or supplement the analysis documented in the EA.

Finding of No Significant Impact

Based upon the review of the EA, the BLM has determined that the Proposed Action with implementation of the mitigation measures identified above is in conformance with the Green River Resource Management Plan. Implementation of this decision will not have a significant impact on the human environment. Therefore, an EIS is not required.

Appeal

This decision is effective upon the date the decision or approval by the authorized officer. The decision or approval may be appealed to the appropriate office of the Interior Board of Land Appeals in accordance with regulations contained in 43 CFR 3150.2. If an appeal is filed, a copy of the notice of appeal must be filed in this office (Rock Springs Field Office, 280 Highway 191 North, Rock Springs, Wyoming 82901) within 30 days of receipt of the decision. This decision will be considered to have been received on the date that it is posted on the internet at http://www.wy.blm.gov/field_offices/rsfo/rs_home.html. The appellant has the burden of showing the decision or approval appealed from is in error.

If you wish to file a petition for stay pursuant to 43 CFR 3150.2(b), the petition for stay should accompany your notice of appeal and shall show sufficient justification based on the following standards:

1. The relative harm to the parties if the stay is granted or denied,
2. The likelihood of the appellant's success on the merits,
3. The likelihood of irreparable harm to the appellant or resources if the stay is not granted,
and
4. Whether the public interest favors granting a stay.

/s/ John McKee

Field Manager

Sept. 13, 2001

Date

Appendix A Errata

Several minor typing errors were inadvertently published with the EA. In addition, the text of the EA has been changed to either correct or clarify its meaning based on comments received. The text of the EA is corrected as follows:

Page 1, 2nd paragraph should read “The project will be in all or a part of the following Federal sections.”

Page 4, 1st paragraph, 8th line should read “ Until an evaluation is made, the management objective for the area is to provide protection of wildlife,”

Page 4, 5th paragraph, last sentence should read “. . . issues were brought forth in their letter dated July 8, 2001.

Page 5, 1st paragraph, last sentence should read “. . . is proposed to be conducted in the late summer and fall of 2001, using”

Page 5, 2nd paragraph under section entitled Proposed Action, 3rd sentence should read “Buggy-mounted drills would be used in sand dunes and rougher terrain.”

Page 7, Item 17 should read “. . . permitted Archaeologist flag or otherwise mark drive around”

Page 9, 1st paragraph, 1st sentence should read “The project area encompasses a variety of landscapes with scarce roads and trails in generally poor condition.”

Page 10, 2nd sentence under section entitled Native American Religious Concerns should read “Arrangements have been made for representatives of Tribal governments to visit the area.”

Page 10, section entitled Off Road Vehicles, last sentence should read “ORV use in the area outside of the WSA and MVMA is limited to existing roads and trails.”

Page 12, after last sentence under section entitled Visual Resource Management add “For those public lands located in the Rawlins Field Office, the VRM classification is Class III. Management actions for Class III public lands must be designed to partially retain the existing character of the landscape.

Page 13, Affected Environment, section title should read Threatened, Endangered, Proposed and Candidate Species

Page 14, Affected Environment, section entitled Threatened, Endangered, Proposed and Candidate Species, add the following paragraphs:

Mountain Plover is a species that is proposed for listing and habitat occurs within the project area. These birds occur in low-growing or open areas where vegetation seldom exceeds 6-10 inches. This species may also be found in black sagebrush, greasewood, and other species found in the sagebrush steppe.

The only riparian habitats found within the project area are associated with several seeps and springs on the south side of the Haystacks. A semi-riparian habitat area forms from annual snow cornice and is located on the east side of the Haystacks. No suitable habitat for the yellow-billed cuckoo has been identified within the project area and sightings of this species have not been recorded.

Page 19, Environmental Consequences/Impacts, Special Status Species, delete reference to mountain plover.

Page 13, Environmental Consequences/Impacts, section title should read Threatened, Endangered, Proposed and Candidate Species

Page 16, section entitled Off-Road Vehicle Use, 3rd sentence is changed to read “Additionally, the RMP recognizes that ORV use to conduct geophysical operations in areas where there are off-road vehicle use designations can be permitted following site specific analysis.” Delete next sentence “Off-road vehicle use designations would be exceeded on public lands in the MVMA.”

Page 19, Environmental Consequences/Impacts, Threatened, Endangered, Proposed, and Candidate Species, add the following behind last sentence.

Due to the timing of activity (late summer/fall of 2001), no impact is expected which would jeopardize the continued existence of mountain plovers. Should geophysical operations not be completed by November 15th, surveys in accordance with U.S. Fish and Wildlife Service’s survey guidelines would apply between April 10th and July 10th as stated under the proposed action.

No habitat has been identified for the yellow-billed cuckoo and no sightings have occurred within the project area. Therefore, BLM determines that geophysical operations will not jeopardize the continued existence of the yellow-billed cuckoo.

Appendix B Summary of Comments on EA and BLM Responses

The EA was released to the public on July 26, 2001, for a 25-day review period, including placement of links on the BLM Wyoming State and Rock Springs Field Office websites. BLM received 437 comment letters or emails. All comment letters are summarized below (in italics) with BLM responses immediately following the comment. However, to save space, letters with a similar theme have been incorporated into one with each individual's name included at the top. BLM appreciates all those who took the time to comment.

1. *Ken Driese, Ed Sherline, Bill Willers, Donn Kesselheim, Mark Jenkins, Jack Clinton, Kelly Matheson, Jack States, Marilyn Dinge, Dave Skinner, Jonathan Matthews, Vanessa Parker-Geisman, Samantha Freeland, Mike Vandeman, Bobbie Flowers, Mark Giese, Annette and Hans Johnson, Gary Vesperman, Peter Aengst (Northern Rockies Regional Office, The Wilderness Society), Angie Young, Doug Campbell, Phil White, Garrett Clevenger, Pat and Jack Jeffers, Laurie Staake, Judi Davis, Nancy Petersen, Don Cohon, Martin Murie, Gaines and Lyn Whitcomb, Karyne Dunbar, Douglas Guilmet, Steve Ford, Bryan Faehner, Carole Shelby, Stephanie Reutner, Amy Williamson, Pat Bacon, Trisha Towanda, Martha Martinez Del Rio, Mary Morrison, Alexandra Majors, Michael Brose, Tim Stevens, Mark Sanderson, Michael Wall, Sigrid Mayer, William Anderson, Jeremy Minor, Mary Sanderson, Michael Durgain, Martie Crone, Paul Moss, Greg Sauer, Karen Miller, Charles Rumsey Jr., Jim Steitz, Patrick Huber, Dave and Betty Thomas, Neil and Jennifer Miller, Daniel Mika, Barry Reiswig, Martha Christensen, Jack and Connie Iversen, Albert Bitner, Rolf Skar, Alyx Perry, Doug Shinneman, Bob Skogley, Debbie Daly (Animal Defense League of Arizona), Edward Kolsky, Elmer Kuball, Bob Giurgevich, Robert Lamb, Charles Hancox, Mimi Crenshaw, Darla Daly, Louise and Bright Springman, Kathy Moriarty, Vicki Rivers, Scott Dieberich, William McIntyre, Connie Wilbert, Sabine Jordan, Sara Haubert, Peggy Dobbins, Frank Calkins, Brook Bullige, Ruth Niswander, Erin Marcus, Linda Heinzl, Randy Luskey, Chole Hadaway, Gene Ball, Ryan Shinn, Donald Self, Jeff Knezovich, Chris Dietrich, Pam Jasue, Jessica Hepmyer, Kelly Thomas, Sharon Huston, Trevor Valoe, Palden Hester, Mikia Boyo, Ian Westboom, Carolyn Trottmann, R. Stomats, Frank Fotey, R. Hershcope, Lee Retzlott, Cherly Korus, Ryan Watson, Michelle Hoycomb, Nicole Karfanta, Don Kennedy, Jerry Trottmann, Joseph Baker, Rebecca Tweel, Robin Dean, Terra Eyl, Betsy Leverth, Leroy Moatoya, Karen Bailey, Jared Budd, Doreen Thurpton, Stephane Huston, Jeff Feaske, Polly Cox, Ted Manahan, Tony Martinez, Amanda Betux, Kelly Baker, Judy Johnson, Kurt Feld, Ruth Bly, Trace Krause, Kat Trague, Tedi Potts, Brian Fetterman, Melissa Landin, Keith Gaston, Robert West, Nick Spagnole, Marty Thompson, Brittany Budd, Paige Noon, Mary Wolpent, Karen Hare, Elizabeth Night, Anthony Ford, Joel Claypool, Andrew Stencel, Dan Woolcott, Cathy Gust, Rose Barela, Pat Dignan, Bergen Ekland, Martine Purdy, David Poncoby, Dawn Gable, Alicia Cook, Sandra Hendrickson, Jason Sterns, John Cavanagh, Joe Hendrickson, Barb Kachalode, Marsha Dinkel, Anita Aceves, Jim McNiece, Earline Hittel, Aurthur Anderson, Catherine Howell, Kristen Painter, Wendell Funk, Robin Smith, Cynthia Wutchiett, Max Kessler, John Sqanson. Another 29 individuals sent in cards but the names were illegible.*

Writing to express opposition to oil and gas exploration and drilling activities of any kind in the Adobe Town area of southwest Wyoming. Wyoming's basins are too often viewed as expendable in spite of their incredible beauty, their importance for protecting the full range of biodiversity in the State, and their relatively untouched character. We need to protect these examples of unique ecosystems rather than exploiting them for short term economic gain. Urge BLM to:

- S *Drop the project;*
- S *Assess the wilderness qualities of the proposed citizen's proposed Adobe Town Wilderness;*
- S *Adobe Town WSA as de facto wilderness and to not permit oil and gas exploration to trespass inside the boundaries;*
- S *Complete a full EIS which should assess how oil and gas development would affect all vulnerable or rare animals (e.g., midget faded rattlesnake, black-footed ferret, great basin gopher snake) and plants, and how the regions wilderness values and natural character would be affected.*

Thank you for your comments. Adobe Town WSA is managed in accordance with BLM's Handbook 8550-1, *Interim Management Policy and Guidelines for Lands Under Wilderness Review*. Any action that takes place within WSAs must meet non-impairment criteria. Hand-laying geophones (recording devices), and the use of helicopters, within WSAs meets the non-impairment criteria. Laying these geophones within the WSA is needed to get accurate data for privately held and federally leased minerals located adjacent to the WSA. No shotholes or exploratory oil or gas wells are proposed to be drilled in Adobe Town WSA. Although Congress precluded issuing new oil and gas leases on public lands under wilderness review, it did provide ". . . nothing in this section shall affect any authority of the Secretary of the Interior . . . to issue permits for exploration for oil and gas . . . by means not requiring construction of road or improvement of existing roads if such activity is conducted in a manner compatible with the preservation of the wilderness environment" (30 U.S.C. 226-3(a) (Supp. V 1987)). No roads are proposed for construction or improvement. Only Congress, with Presidential approval, can designate an area as wilderness.

National Environmental Policy Act (NEPA) requires preparation of an EIS if the action is considered "major" and/or impacts are "significant." Department of the Interior Manual 516 DM, Appendix 5, Section 5.3 defines major actions that normally require preparation of an EIS by BLM (see Federal Register Notice, Vol. 57 No. 62, starting pg. 10913 for latest version). Geophysical operations do not meet the criteria set forth for actions normally requiring preparation of an EIS nor are the impacts of conducting geophysical operations significant. Therefore, preparation of an EIS is not necessary.

It should also be noted that geophysical operations provide valuable information on where, as well as where not, to conduct exploratory drilling for energy resources. Further, a large portion of the area proposed for geophysical operations is located on private (or state mineral) lands (checkerboard land pattern) with the remaining on public lands, most with valid, existing federal oil and gas leases. Some of the area involved is currently being analyzed for natural gas exploration and development in a project known as the Desolation Flats Natural Gas Project in which an EIS is under preparation. The northern portion of the project area has already been analyzed (EIS) and approved for natural gas development in the Continental Divide/Wamsutter II Natural Gas Project EIS.

2. *Dave Kennedy, Howard Robertson, Keith Stevens, Mack Johnson, Ernie Williams, Greg Wood, Colleen and Stephen Leeson, John Linn, Mike and Pat Dighans, James Barlow, Nickalus Junt, Mike Poirier, Jim Olsen, Edward Hernandez, Jim Piaoah, Mark Wagaman, Krista Torres, Richard Trevino, Mike Bertness, Vincent Dewolf, Allan Sander, Luis Bonsembiante, Lisa Trevino, Howard Turuis, Sandy Schultz, S. Brooks, Nadviodad Vazquez, Dave Purcell, Scott Hoenmans, Dan Siegel, Shelly Watt, Debroah Sycauve, Dan Dooley, Troy Roach, Beverly Matthews, Dan Whitman, Brant Carwright, Chad Kalk, Byron Tegrdine, Chris Peck, Dave Dutchover, John Deruberger, Henry Biggart, Cory Gifford, Faucto Blarco, Donnie Stone, Steve Potter, W. Rigby, Brad Hurt, Cooper Reiger, Juan Martinez, Jim Phillips, Donald Stafford, Tracy Nessler, Davion Bonnetts, Chevy Chase, Virginia Simmons, Joe Esparaza, Adrian Royos, Carlos Duque, Alfredo Malonado, Vicki Mauoz,*

Joe Rosas, Kennell McMillin, Frank Hall, Joe Cartwright, Greg Huey Patrick Payne, David Grunter, Paul and Marlene Sibley, Marty Hall, Hugh Fraser, Tom Makris, Jeff Harwell, Jennifer Schwartz, Daniel Murphy, James Morgan, George Crawford, Steven Mills, Willie Koenig, James Wooldredge, Alfonso Munoz, Daniel Hutt, Ricky Gonzales Jr., Robert Ramos, Jose Monor, Frank Garza, Graham Anderson, Juan Trevino, James Crawford, Javier Camarillo, Terry McCloud, William Sewando, Terry Donze, Jay Carmichael, Jon Allen, Kermit Krily, Thomas Hivoues, Teresa Tranum, Roger McGarry, Patrick Harts, Kirt Miller, Howard Robertson, Josh Nunn, Jerry Hasuer, Charles Webb, Matt Roth, Nancy Gilsar, John Harts, Juan Carrillo, Willie James Jr., Roger Lopez, Keon Allen, Sergio Sanchez, Roger Witt, Juan Martinez, Harry Chapman, Gwen Docelson, Tina Perez, Clarence Haws, Tony Orthmam, Carrie Senanet, Billy Zucker, J Albill, David Bittle, John Cotton, R. McKay, Derrell Marintez, Albert Hardy, Francisco Jauierreyes, Douglas Goodwin, Deanna Goodwin, Mills Lange, M. Willie, Raz Bams, Martin Ortiz, O. Robinson Jr., G. Pettinger, Julie Martin, Orlando Rodriguez, Anthony Perry, Michael Lege, Cerilo Carrillo, Martin Bails, Joe Aluter, Joe Ayalu, Richard Andersen, Arden Bach, Johnny Ruiz, Allejandro Martinez, Alvaio Pealez, Larry Pike, Will Huff, Cheyenne Miller, Mike Mayne, Nathan Williams, Larry Shoeini, Kevin O'Connell, S. Machuey, Vicente Salinas, Christopher LaPlante, Michael Bienevour, Scott Rothwell, David Coddling, Dave Moysey, Scott Harman, Rob Horine, Richard Rosencrans, Richard Garcia, Melissa Mrazek, Danielle Porter, David Cruz, Dan Chavry, Jessica Mrazek, James Devlin, Rebecca DuPont, Fred Meendsen, Karen Malick, Roy Bennett, Rick Woodward (Bentwood, Inc.), John Ellis. The same letter was received by another 14 individuals whose names were illegible.

Support the Haystacks 3-D geophysical project being proposed by Veritas. Seismic information gathered on 3-D projects allows oil and gas exploration companies the opportunity to eliminate the expense and surface impact of drilling and reclaiming multiple exploratory wells. The short-term impact is minimal and the long-term impact is negligible.

Current energy demand will continue to grow in the future and projects such as this will go a long way in helping to meet this demand. Geophysical data gathered with 3-D projects is crucial in the exploration effort required in drilling successful wells. A hundred individuals will be needed to conduct the operations and each crew spends thousands of dollars that bolster the local economy.

Thank you for your comments.

3. Bill Spillman

Geophysical operations should be denied. This is a continuing attempt to chisel around the edges of the unique landscape that southwest Wyoming. One can see a steady stream of oilfield trucks when traveling north of Rock Springs and this is what BLM would subject all of Wyoming to. This desert will show scars of development for lifetimes, litter, and industrial waste. These out-of-state companies have no respect for the values of this land and are only here to take the cream. One issue that wasn't addressed at all is black-footed ferrets that I have personally seen in Sweetwater County over the past 10 years. As prairie dog populations continue to decline, it is more important than ever that any possible infringement of territory that may provide shelter for this endangered species needs quashed. There are many other issues that can be discussed for not allowing planning or outright development of this desert area and most or ignored by BLM as it rushes headlong to suck every last royalty dollar. This is a WSA and should unequivocally remain free form industrial consideration for development.

Thank you for your comments. BLM invites you to contact us to discuss your sightings of black-footed ferrets. Please see response to Comment #1.

4. *Julie Kay Smithson, Joe and Phyllis Bell*

While the area you are considering for [geophysical operations] is beautiful, it also very likely contains resources that can help our country provide its citizens with oil and gas, without importing it from halfway around the world. I seldom see a decision that puts the needs of the American citizens before the “deep ecology” individuals who purport to “speak for the plants and animals.” I urge you to consider that oil and gas exploration will help keep our country healthy.

Thank you for your comments.

5. *Warren Anderson*

Drew an area 57 antelope license. Area 57 has historically been the hardest to draw and the best trophy area for antelope hunters in Wyoming. There are only 75 licenses in this vast area. This is one of the best wilderness hunting opportunities in America. Part of this area is the Adobe Town WSA. Horrified to discover that you have given preliminary authorization to the Veritas Haystacks project.

Wyoming Game and Fish Commission 2001 regulations set the limit for type 1 (bucks, does, fawns) antelope licenses at 300 and type 6 (doe/fawn) at 25 in area 57 for 2001. Type 1 antelope season runs from September 20 to October 15, and type 2 runs from September 1 to October 14. The Haystack project area affects only a small portion of area 57. During geophysical operations approximately 20 to 30 individuals will be needed for drilling the shotholes and laying geophones, and another 50 to 60 individuals will be required during recording. The EA acknowledges that geophysical operations would occur during antelope hunting and that hunters in the vicinity of geophysical operations could be slightly inconvenienced.

This betrays your commitment to study this area as a BLM wilderness as directed by Congress. Given that part of the area involved is a WSA requires an EIS before this project can take place. Failure to do an EIS opens the door to have the project stopped by litigation. You should consider the Citizens' Adobe Town Wilderness Proposal. The area contains unique and remarkable resources including desert landscapes and wildlife. The Museum of Natural History (New York) has identified portions of the area [BLM does not identify specific locations] as one of the four most important fossil collecting locations in the US. Authorizing this project in an area that has been considered as a national park is a sharp stick in the eye to the people of the Wyoming and the US.

Actions proposed in WSAs do not necessarily require an EIS. Analysis of wilderness proposals normally requires completion of an EIS in accordance with Department Manual 516, Appendix 5, Section 5.3, Actions Normally Requiring Preparation of an EIS. As stated in item 19 (Proposed Action, other commented measures) of the EA, the proponent has contracted with a BLM-permitted paleontologist to map all known paleontological sites located on public lands. All known sites will be avoided during operations. In the unlikely event that the proponent wanted to change their operations to include activities such as road construction or ground excavation of any type, a field survey would be required prior to surface disturbance. Appropriate measures would be taken at that time to protect the resource. Thus, there will be no impact to paleontological resources. Please see response to comment #1.

6. *Tom Clayson*

RME Petroleum, a subsidiary of Anadarko Petroleum Corporation, owns a considerable portion of the minerals located in the proposed exploration area and the proposed project will affect RME and its interests in the area. Acquisition of subsurface data through 3D seismic technology will positively affect management of the nation's mineral and biologic resources as well as those of the intermingled non-federal lands. The project is a first step toward industry's ever increasing ability to reduce its footprint on the ground. Using 3D technology results in a thorough understanding of the subsurface in a minimally invasive manner.

With data obtained from the project, operators can better determine those locations where not to drill and often leads to a reduction in the overall cost and surface impact of a drilling program. Reduced costs will foster affordable and reliable energy for our nation, while imparting minimal impact to the environment. Overall, public land will benefit due to the high potential for less surface disturbance to occur.

BLM Manual 3150, Onshore Oil and Gas Geophysical Exploration Surface Management Requirements, provides that geophysical exploration by helicopter or other means not requiring road construction may be authorized in a WSA if it satisfies the non-impairment criteria. The 3D survey meets the non-impairment criteria for the following reasons:

- Temporary presence in the WSA and no new surface disturbance will occur;*
- Operations inside the WSA will occur on foot and only consist of placing geophones and cables on the surface;*
- Impacts will no more damaging than that inflicted by recreational use of the land;*
- Compaction of soils or vegetation in the WSA will not occur, thereby negating the need for any reclamation;*
- When 3D activity is completed, the area will remain suitable for wilderness designation by the US Congress should they decide that wilderness management is appropriate for the area.*

RME has concerns with the mitigation measure on page 7, item 20 (avoidance of Overland Trail, no shotholes allowed within 300 feet of trail, no visual disturbance the trail corridor, and crossing the trail in disturbed areas only). RME understands the conflicts between cultural resources and other resource uses require resolution. Nevertheless, we believe that federal mitigation measures for the Overland Trail should not be applied to non-federal lands. RME view conflicts over resource use and impacts to the Overland Trail on non-federal lands as civil matters between the [private] landowner and operator.

RME believes that a finding of no significant impact for the Haystack/Monument Valley Geophysical Project EA is supportable and urges timely action on the project.

Thank you for your comments. The Overland Trail (48SW1226) as a general historic property has been determined to be eligible for inclusion in the National Register of Historic Places in previous consultation between the BLM and the Wyoming State Historic Preservation Officer (W-SHPO). However, specific places along the Overland Trail may ultimately be determined to be eligible or not eligible during future consultation efforts with the W-SHPO. BLM, in the GRRMP has determined that avoiding effects to the Overland Trail by not allowing shotholes within 300 feet of the trail is an appropriate mitigation measure given the trails historical nature and likely NRHP eligibility of any given segment of trail.

Since the geophysical project is a federally permitted undertaking, it is covered by regulations governing implementation of the National Historic Preservation Act (especially Section 106 of 36 CFR 800). Pursuant to Section 106 of 36 CFR 800, potential effects to all NRHP eligible or potentially eligible historic properties must be taken into account by the BLM when permitting any federal undertaking. In other words, the BLM

must consult with the W-SHPO concerning eligibility and effects of the undertaking upon NRHP eligible properties whether they be on private or federal lands. In order to expedite processing of the Notice of Intent for this project the BLM applied the same avoidance stipulations it applies to protect the Overland Trail on federal lands to portions of the trail on private lands.

The private landowners are free to deny application of this stipulation on the trail on their lands. Refusal to allow this protective stipulation would cause the BLM to consult with the W-SHPO acknowledging the potential for an *adverse effect* to occur to the Overland Trail on private lands as a result of permitting the federal undertaking. This option is entirely up to the private landowners involved; however, a determination of "adverse effect" would trigger a much extended consultation effort, possibly involving the Advisory Council on Historic Preservation and obviously would greatly delay implementation of the project.

7. *Michael Evans*

Based on the reports that have been in the Rawlins newspapers and on the radio. You are considering the possibility of allowing seismic exploration in the Adobe Town WSA. If you are going to honor the status of any WSA, you cannot allow motorized vehicles. Otherwise, the BLM are admitting you will next permit oil and gas drilling and simply ignore and destroy the wilderness attributes of the area. I know of no place whether there has seen recent seismic exploration and that drilling is not planned or already taking place.

In the past several years, I have seen the Powder Rim and all the country north to the Haystacks repeatedly "explored" by countless surveys and the thumper buggies. These project have left tracks everywhere you can ride a horses and thousands of yards of fluorescent tape. Three weeks ago from the north slope of Powder Rim in the dark of night, you could see the lights of at least 10 drill rigs, except in the area of Adobe Town. In the light there are constantly dust trails as vehicles roar up and down roads that were not even there five years ago. All of this commencing before the so-called energy crisis we are suppose to be having today. I know you are under great pressure from your agency's leaders and the current administration's energy plan to open up all potential oil and gas areas to drilling. Please respect WSAs. You and the oil companies can explore, drill, and trespass 90% of Wyoming now and if there is any potential, somebody will for very short term gain. Please protect the Adobe Town WSA. The whole area is still wild and supports all the wildlife it did when Butch Cassidy and his pals rode through there. It deserves recognition and protection of wilderness status.

Thank you for your comments. BLM must manage WSAs and all public lands in accordance with the mandates of Congress. As stated in BLM's response to comment letter #1, while Congress precluded further oil and gas leasing in WSAs (Adobe Town contains existing oil and gas leases), it did allow for mineral exploration via geophysical operations within WSAs as long as it meets the non-impairment criteria. Hand-laying geophones to record seismic sound waves is considered a non-impairing activity. No vehicles will be used in the WSA and no natural gas or oil wells are proposed to be drilled in the WSA. Approximately 50 percent of the project area was analyzed and approved for oil and gas exploration and development in the Continental Divide/Wamsutter Natural Gas Project. Part of that analysis included transportation planning and road maintenance including dust abatement. We have notified the Rawlins Field Office of your concerns about dust.

8. *Leo and Rosemary Benson*

Read about the project in the Casper Star-Tribune and learned that BLM received a citizen proposal from conservationists and that the document contains more than 950 pages of documentation. We understand that

the Adobe Town WSA contains 85,710 acres, the document includes evidence that it should have been and still could be expanded to twice the size or more. It is possible that errors of omission were made back in the 1970s when BLM inventoried these lands. The wilderness proposal deserves a thorough inspection before you start in motion any activity that might develop an unstoppable momentum of its own. We read that the minerals industry won't bother to disturb the area at all if seismic mapping finds little promise of oil or gas. The article didn't mention what would happen if oil and gas is indicated. We know it would likely resemble what is happening all over in Sublette County. Perhaps you would hear that many wells could be developed from 1 pad, then later hear that oops, that wouldn't be economical. And all the roads and pipelines would adversely affect wildlife. If you were to reaffirm your directive to maintain the wilderness aspect of the WSA for now and in your mandate managed public land for its highest use, there would always be chances in the future to request again the opportunity to explore and to develop what might be found. You must work to enlarge the current WSA. Oil and gas won't go away and the future owners of public land will have the opportunity to prioritize the treasures of their land. A majority could always reconsider and decide against wilderness as the best use of these lands or they might instead applaud and retain wilderness protection if you work for it now. At least they would have a choice. Start development with an EIS, the area is too important to be changed forever because of negligence.

Thank you for your comments. The proposed geophysical project will not adversely affect potential wilderness characteristics, should they be identified, and therefore would not disqualify the area from further consideration as a WSA.

9. Bill Phelps

Wyoming's greatest economic asset is not energy sales. In the future, wild land will be the greatest economic boom. The continuous population increases projected of the next 50 years will eventually use up the scant energy supplies we can find as we must also eventually find more efficient technology to consume less energy. Once we develop wild land, it is gone forever. No efficient technology can bring it back. Please preserve the wild land that remains in your corner of Wyoming, especially the Adobe Town WSA.

Thank you for your comments. Please see BLM's response to comment letter #8.

10. Marvin Brittenham, Flying J Oil & Gas

Flying J Oil & Gas supports the acquisition of the Haystacks geophysical project as proposed by Veritas. Seismic data gathered in areas such as this helps properly locate exploration wells thereby minimizing the surface disturbance and impacts otherwise caused by drilling exploratory wells. Surveys with 3D seismic data also further enhance the potential for eliminating unnecessary development wells and their associated impacts. The Washakie Basin has a tremendous resource base of clean burning natural gas to help fuel our Nation and the data gathered from this survey is crucial in the exploration efforts of our extraction industry.

Thank you for your comments.

11. Duane Keown, Katherine Fitch

Writing regarding the lack of an EIS concerning the Adobe Town WSA and possible impact prior to the Varias [sic] Haystack Seismic Exploration Project. I understand that this exploration will be within the Adobe Town WSA. You have protected and preserved this area as a possible wilderness area and now you are preparing to risk its wilderness character for oil exploration. Exploration with seismograph risks the

potential for designated wilderness area of course if the exploration finds good probability of oil or gas, drilling will take place and the land's wilderness designation potential will forever be lost, especially if oil or gas is found in an amount that is profitable.

Even more shortsighted is the sacrifice of this land's wildness in view of the longevity of fossil fuel as our primary source of energy. The best estimates even by the oil companies do not give oil and gas 100 years as our primary source of energy for transportation and heating. Of the industrial and developed nations, only the US is projected to double in population in the next 100 years, primarily from immigration. The best use of this land for the next 100 years is no use at all.

Like to add another version of our energy use and production in the near future, one that public land managers would do well to consider. It certainly is not the vision for public land and energy needs held by the current administrations, federal or state. This description of a conservation path for energy production and use was published as a guest editorial I wrote for the Casper Star Tribune May 27, 2001 under the title "Burning Issues." Adobe Town Wilderness can be serving the 500 million Americans in 100 years and for posterity. If it is opened to oil exploration now, 100 years the fossil fuel it contains will have contributed to the carbon dioxide increase in the atmosphere and the wildness character of the land will have been sacrificed. Probably 100 years hydrogen will be our primary fuel. The earth's fossil fuel remaining will have uses of higher priority than to be burned as energy.

Thank you for your comments. Please see BLM's response to comment letters #1 and #8. No exploratory wells for oil or gas are proposed within the Adobe Town WSA.

12. Jason and Linda Lillegraven, William and Jane, Bigler.

Wyoming has vast areas that are unique. These areas serve a refuges for the full range of native biota and provide attraction for the human citizenry who wish to experience ecosystems that elsewhere are becoming restricted essentially to the point of loss. Adobe Town gained its name because of the pale rocks, when viewed from a distance, look like scattered ruins of Mexican desert villages. The badlands landscape becomes ever more spectacular as one actually enters the Adobe Town. The area is relatively unspoiled, with a minimum of existing roads and a maximum of natural quiet and peace and endemic life-forms. There exists no more remote area in all of Wyoming, and its environmental fragility is extreme. The general vicinity of the Adobe Town that was considered for national park status and is presently is an official BLM WSA. Adjacent areas to the WSA represent part of the citizen's proposed wilderness. Although the WSA is official for your agency, the existence of the latter has not yet been acknowledged by BLM.

What would justify BLM to allow active energy exploration (using off-road motorized vehicles) within a WSA prior to satisfactory completing an EIS? BLM is not mandated to put the economics of energy development above intangible values of preserved lands. At the very least, the process of study of environmental impacts should proceed to completion prior to allowing trespass upon these public lands of oil and gas corporate interest. The citizen's proposed wilderness should be acknowledged by BLM as being relevant to considerations of this WSA.

Thank you for your comments. Please see BLM's response to comment letters #1 and #8.

13. Jerry Devin

In my visits to the Red Desert, I have observed many wells being drilled and gas wells that have been completed. I have seen antelope laying o the completed wells and grazing closely to wells being completed. I feel with proper safeguards and following environmental policies already in place, this area can be explored and drilled for production value oil and gas without harming the environment. I have seen restored areas where coal was previously mined and those areas all had more vegetation and better vegetation than the adjacent, untouched areas. I agree with BLM, giving preliminary authorization for exploration of this area as long as all appropriate environmental safeguards are followed.

Thank you for your comments.

14. Darrell Gillen, Williams Energy Services

William Energy Services supports the Haystacks 3D geophysical project as proposed by Veritas. Seismic information gathered on 3D projects, such as the Haystacks, allows companies the opportunity to eliminate exploratory wells. The geophysical data gathered with these types of 3D projects is crucial in the exploration effort required in drilling successful wells.

Thank you for your comments.

15. Rick Obee, CPC Energy

Energy demand for our country has continued to expand and that the supply and demand concerns which have been exhibited in California are only a snapshot of the problem. All forecasts that I have seen predict a continued increase in energy demand by the US public. Californians have stated the cost of energy must be kept low and that requires the energy industry to utilized efficient, innovative, and cost efficient means to locate and develop the needed fuels to generate this energy. Three-D seismic surveys are efficient and are designed to aid in defining the hydrocarbon accumulation which fuel our domestic energy needs. Geophysical data will be used for years to come to define and refine drilling locations for oil and gas wells. I share concerns for the environment and believe the use of advanced technologies to more successfully locate and refine locations for hydrocarbon is positive for the environment.

Thank you for your comments.

16. Wendy Keefover-Ring, SINAPU (Southern Rockies Carnivore Restoration Project)

The discussion and mitigation measures in the EA are woefully inadequate to handle the kind of damage that oil and gas exploration, drilling, and other activities proposed for these federal lands. These harmful activities will occur in wilderness-quality lands which have been identified by citizen's groups, located adjacent to the Adobe Town WSA. The damage to lands, cultural artifacts, water, and wildlife have not been adequately analyzed in any meaningful way and yet, it appears that the BLM is willing to move forward with the project.

Geophysical operations are not equal to nor the same as oil and gas exploration wells where roads, wellpads, and associated facilities are required. Geophysical operations entail drilling a small (3½ to 4½-inch) hole 60 feet deep, placing low-level explosive material, and repacking the hole with the drill cuttings. No disturbance is needed other than the hole.

We provide a few examples to illustrate some of the inadequacies of the EA. The EA only give big game an abbreviated season on “crucial...winter range” from only mid-November until April 30th. Getting adequate forage and browse in the wintertime is fundamental to the survival of big game species. Stressing animals with auditory and visual stimuli will ensure that animals will spend their precious energy budgets fleeing instead of foraging which may result in a decrease in the herd’s fitness.

The commenter misunderstands the purpose of the crucial winter stipulation. Veritas is planning on completing their geophysical operations before November 15 when BLM stipulations for protection of crucial winter range apply. Should Veritas not complete their operations by November 15, then the stipulation to protect such ranges would apply. Crucial winter ranges for mule deer and pronghorn antelope occupy only a small portion of the project area.

Impacts to rare fauna including swift fox, ferruginous hawk, burrowing owl, greater sage grouse, mountain plover, black-footed ferrets, the Great Basin gopher snake, and the midget faded rattlesnake are either not discussed in any meaningful way nor are mitigation measures adequately addressed in this plan. The proposed oil and gas activities ensure these sensitive species, threatened, or endangered species decline.

BLM has considered all special status species potentially affected by the proposed geophysical operations. Some of the mentioned species do not inhabit the area and the hole density in prairie dog towns or complexes found in the area do not meet the criteria developed by the U.S. Fish and Wildlife Service for black-footed ferret habitat. Thus, species that do not inhabit the area are not affected by the action. For other special status (sensitive) species, important life events (e.g., rearing young) have been completed for the season. The great-basin gopher snake (*Pituophis melanoleucus deserticola*) is very uncommon in the Haystacks area. During summer this species seeks subterranean habitats to avoid dessication and to seek food. Shothole seismograph activities should not adversely affect this species. Veritas has been instructed to advise their field crews that reptiles are not to be harmed or destroyed within the project area. The midget faded rattlesnake (*Crotalus viridis concolor*) does not occur in the project area. The uncommon rattlesnake found on the southern two-thirds of the project is the prairie rattlesnake (*Crotalus viridis viridis*). Therefore, the impact of conducting geophysical operations is not likely to have an adverse effect on these species or lead to the listing of sensitive species that inhabit the area.

BLM has failed to show how monitoring and compliance for the protection of water resources and riparian areas will occur. How will BLM prevent silting and erosion. What mitigation measures will be in place where vegetation grows slowly? Will Veritas replant and water vegetation. Or will it extract what it needs leaving the landscape scarred and poisoned. The EA does little to assure that Veritas will comply with environmental laws, let alone BLM regulations.

Veritas voluntarily committed to use heliportable drills on approximately 20 percent of the project. Although expensive, it precludes vehicles from the Haystacks and adjoining badlands which reduces erosion and human-made scars. The project proponent contracted a geologist/hydrologist to review geologic literature and apply hydrologic criteria to protect seeps and springs in the project. Field surveys for spring and seeps identified 11 small water sources in and on the Haystacks. An elliptic circle was drawn upslope from each seep to provide about 1/4 mile protection from the shothole. Adverse effects to water sources from the Haystacks project would be negligible.

The discussion for the protection of and mitigation for cultural and historical artifacts is inadequate. BLM has neither catalogued nor inventoried what artifacts lie above the surface and it hopes that Veritas will

notice BLM permitted Archeologist's flags or marker and avoid crushing or otherwise destroying irreplaceable relics.

A Class I literature review and Class III on-the-ground cultural resources inventory was performed on all federal lands involved in the project area, and a Class I literature review was performed on all private lands. All eligible or unevaluated historic properties on both federal and private lands will be avoided by modification of the geophysical plan of operation to provide for all vehicle traffic to drive around those locations. No shotholes will occur on any eligible or unevaluated historic property identified in the literature search or the Class III inventory, or in the case of private lands in the Class I literature review.

The determination as to whether or not to require a Class III level inventory on private lands is made by the Field Manager following receipt of information from the Class I literature review on both federal and private lands. The private landowners are also consulted regarding whether or not they would prefer to have an on-the-ground inventory done on their lands and their comments are taken into consideration when the Field Manager makes his determination.

Factors that would likely trigger the BLM requirement for an on-the-ground inventory on private lands are:

1. The request of private landowners to have such an inventory done on their lands.
2. A much higher than normal density of historic properties (regardless of eligibility determination) in any or all of the project area. Normal site density (from the GRRMP) is generally considered to be six (6) to eight (8) sites per section, or per 640-acre tract.
3. A high potential for especially sensitive site types such as human burials and/or other sites of concern to Native Americans.
4. Knowledge of any eligible historic property or property type that would be especially vulnerable to effects that could occur from this specific type of undertaking whether that property is on federal or private land.

In the case of the Veritas Haystacks 3D Project, none of these factors were involved. The private landowners specifically requested that no Class III on-the-ground inventory be conducted on their private lands. After taking these factors into account, the Field Manager made the determination that the Class I literature search on private lands would adequately meet BLM obligations for private lands under the National Historic Preservation Act.

A full EIS is clearly warranted because of the number of sensitive or rare flora and fauna that inhabit Adobe Town WSA and the wilderness qualities of lands nearby. The EIS must expand the scope of now identified, like whether Adobe Town WSA and adjacent lands are a potential dispersal corridor for species, including canis lupis. We can not know what impacts this project will have on historical artifacts and relics because no inventory has been disclosed by the EA. BLM must work with professional archeologists to determine what historical resources it may forever lose if those items are not catalogued and provided adequate protection. We request a full EIS to take into account Biodiversity's wilderness proposal.

BLM disagrees with the commenter's claim that an EIS is necessary due to the number of sensitive or rare flora and fauna that inhabit Adobe Town WSA. Wildlife and plant species habitat found within the Adobe Town WSA are also found outside the WSA. The conclusions reached in the EA are valid. Other measures

are in place to protect big game habitat, raptor nesting habitat, and greater sage grouse and mountain plover nesting habitat. No impacts are expected to these species since the proposed geophysical operations will be outside the time frames important for the rearing of young. No gray wolves inhabit the project area.

The commenter fails to acknowledge the private lands and more importantly the private land and/or mineral owner wishes for the use and enjoyment of their private lands. “A Citizens’ Wilderness Inventory of Adobe Town” (Biodiversity, et al.) shall be reviewed and field checked as time and workload allow. Since seismic activity proposed in this EA will not affect wilderness characteristics, further review is not immediate in relation to the proposed action.

17. Dru Bower, Petroleum Association of Wyoming (PAW)

Veritas has agreed to numerous committed measures which go beyond the required protective measures established in the current land use management plan. They have demonstrated their willingness to work with BLM in protecting the environment. PAW believes the project is mitigated to insignificance. These applicant committed measures are voluntary action agreed to by Veritas and should not establish precedent for future similar projects. Currently, Veritas is bound by the mitigation measures in the land use plan along with existing terms, conditions, and lease stipulations. Mandatory mitigation in effect is more than adequate to protect resources. There is minimal surface disturbance proposed and no significance criteria is exceeded to indicate that an EIS is necessary. Specific comments include:

BLM has worked diligently with Veritas to assure that all resources are protected. All committed measures are voluntary on their part.

Page 12, Monument Valley Management Area. The nature of 3D seismic activity will not change the VRM classification and not have an adverse impact on the viewshed.

Thank you for your comment.

Page 12, Manage WSA’s as Class I viewshed. Veritas is not proposing to drill any shotholes in the WSA, only hand lay geophones on the surface and use of a helicopter to transport personnel and equipment. There will be no surface disturbance or change to the VRM status; therefore, no adverse impact will occur within the WSA.

Thank you for your comment.

“Wyoming Statewide Wilderness Study Report, Wilderness Study Areas Specific Recommendations” (Sept. 1991) states that of the 85,710 acres of BLM land in the Adobe Town WSA, the report recommended that only 10,920 acres be recommended as wilderness and that 74,790 acres be released from designation. Because Congress has not made a final determination regarding wilderness, BLM continues to manage the entire WSA as wilderness. The proposed action does not impact the 10,920 acres recommended for wilderness. It affects only a small portion of the acreage BLM recommended to be released from wilderness designation. There are valid existing rights that must be honored and the project should not be delayed based on concerns regarding impacts in the WSA as no adverse impacts will occur.

Although BLM recommended 10,920 acres for wilderness designation in the Adobe Town WSA, Congress will be ultimately responsible for determining whether the area will be designated as wilderness and if so, how many acres the wilderness area will encompass.

Page 15, paragraph 4, Overland Trail will be avoided regardless of land ownership. PAW strongly opposes BLM's mitigation regarding surface disturbance on private property. Unless BLM or the applicant has received permission from the landowner to mitigate impacts on private property, this language should be removed.

Veritas has agreed as part of their proposed action to avoid the Overland Trail regardless of land ownership. It is voluntary on their part and BLM is grateful that Veritas has been willing to work with BLM to protect resources found in the area.

On page 7, BLM states "in no case would there be any visual disturbance to the trail corridor." While the Overland Trail is protected in the RMP with a "1/4 mile or visual horizon, whichever is less," it is not a Congressionally designated historic trail. According to the BLM Wyoming State Office, only congressionally designated historic trails will be subject to a viewshed analysis, but there is no discussion as to the protection of a corridor for this trail. PAW opposes additional protective measures for the Overland Trail that are not reflected in the RMP. The project will not directly effect the trail and 3D seismic will not effect the viewshed from the trail within the 1/4 mile restriction. No adverse impacts directly effecting the trail will occur.

The Overland Trail is not a Congressionally designated trail. Veritas has voluntarily agreed to avoid the trail corridor regardless of surface ownership and is aware of the 0.25 mile RMP requirement.

Page 18, Wildlife. Three-D seismic is to the oil and gas industry as a cat-scan is to the medical profession. It is quick and painless way to avoid unnecessary and intrusive exploratory surgery. A detailed image of the subsurface that 3D provides allows the operator to target the most promising areas while avoiding areas that would otherwise require exploratory drilling, which must be analyzed as an alternative to seismic activity. This technology is short term, temporary disturbance, and does not require the construction of surface facilities or roads. Impacts to vegetation and soils is temporary and will be eliminated after 1 growing season. The short term and disperse nature of the 3-D seismic and its minimal need for vehicles will not create a significant impact.

Thank you for your comment.

Socio-economics was not addressed in the EA and PAW believes that an analysis should be included. While the proposed action may not stimulate tremendous growth in the economy, residents of Wyoming and the participating counties will benefit by directly creating new jobs and additional revenue if further development is determined to be economically feasible after the exploratory project is completed. PAW believe that this project creates minimal disturbance to the environment and has been mitigated to insignificance. PAW supports the proposed action with modifications.

Drilling of oil and gas wells is not dependent upon geophysical operations and future social or economic impacts cannot be determined at this stage. If the data shows that there are commercial quantities of energy and if the private and/or federal lessees want to develop the resource, socio-economic impacts would be analyzed at the time of proposed development. Approximately 50 percent of the geophysical project has already been analyzed, including social and economic impacts, in the Continental Divide/Wamsutter II Natural Gas Project EIS. Another portion of the project area is currently being analyzed in the Desolation Flats Natural Gas Project but the EIS is not ready for public release.

18. Carol Kruse, State of Wyoming Office of Federal Land Policy

We have several concerns regarding the distribution of the document. We did not receive the EA until August 1 and comments were due to BLM by August 20th. State agencies need a minimum of 30 days to review documents. It is also of concern that the project was allowed to proceed before an EIS and NEPA comment period were completed.

The public comment period reflected deadlines for completion of the geophysical project prior to winter wildlife restrictions. BLM has not allowed geophysical operations to occur on public lands; no such activity would be allowed on public lands until the permit is approved. An EA has been prepared for this proposal which concluded that there are no significant impacts; therefore, preparation of an EIS is not necessary.

There is no quantification of acreage to be disturbed and no indication of how long “temporary” might be regarding impacts and disturbances to visual, vegetative, and wildlife resources. Neither is there detailed discussion of what type and duration of disturbance might occur for area users, such as hunters and ORV riders. It is difficult to determine how BLM arrived at repeated conclusions that impacts can be mitigated to a non-significant level. We saw no cumulative impact discussion from this plus other concurrent or reasonable foreseeable project such as the Continental Divide/Wamsutter II development.

As explained in the EA (see Proposed Action), no surface disturbance is required other than the 3½ to 4½-inch drill hole which is drilled to a 60-foot depth, packed with low-level explosive, and then repacked with the drill cuttings. The end result is there is no surface disturbance associated with this geophysical project and once the hole is drilled and repacked with the cuttings, there is no further impact to the area where the hole was drilled. Once all the shotholes have been drilled and repacked, geophones are set out to record the sound waves produced as the explosive material at each shothole is detonated. After the shotholes are detonated, the geophones are picked up and any flagging or other material is removed and the project is completed. If reclaimed areas (e.g., reclaimed roads) are disturbed due to rutting, the proponent is required to reseed the ruts. Geophysical operations would likely be conducted during hunting season and those hunters within the immediate area of operations could be slightly inconvenienced. Cumulative impacts were addressed with each resource. With the exception of the potential for future exploratory or development wells (the number of which is unknown), no cumulative impacts are expected to other resource values due to geophysical operations. It is likely that unnecessary exploratory wells would be drilled if geophysical operations are denied (p. 19, EA).

Given the less than optimal condition of both big game and their forage due to our recent drought, Veritas is encouraged to complete the operation, at least within crucial winter ranges, prior to seasonal occupation of those ranges. Please note Wyoming Game and Fish’s safety recommendation that workers wear hunter orange should the project not be completed prior to hunting season.

BLM has added a measure to encourage Veritas to protect worker safety as most likely, operations will occur during the hunting season.

We acknowledge the need for 3D exploration in this high natural gas potential area. Such images will provide valuable knowledge of the extent and location of reserves, and the economic and technical feasibility of recovery.

Thank you for your comment.

19. Lance Cook, Wyoming State Geological Survey

The area under consideration has an extremely high probability of occurrence of natural gas resources. Productive fields are found to the north, south, east and west of the two WSAs. The proposal lies directly in the heart of the productive Washakie Basin. Seismic surveys require recording data outside of a specific boundary and hand-laying receiver lines within the WSA does not require drilling or vibrating in the WSA. This will allow collection of vital seismic data up to the edge of the WSA. Without gathering this data, areas up to a mile away from the WSA boundary will be inadequately imaged by the seismic project resulting in a possible waste of the natural gas resource.

Thank you for your comments.

20. John Robitaille, Wyoming Business Council

The Wyoming Business Council has reviewed the EA and feels it is in Wyoming's best interest to pursue the proposed project. If seismic exploration is successful, the opportunities for further development increase dramatically. Although not addressed in the EA, benefits for Wyoming include increases in tax revenue and decreases in the jobless rate.

Thank you for your comments. Please see response to comment letter #17 with regard to socio-economic impacts.

21. Tom Collins for Bill Wichers, Wyoming Game and Fish Department

The EA notes that the disturbance of shrubs is expected, is considered a short-term disturbance, and notes the vegetation will eventually recover in a few years. Shrub recovery is dependent on several factors and in arid climates takes longer to recover than in higher precipitation areas. Older age-class shrubs that are disturbed could take 30-40 years to return to their pre-disturbance size and function. Accordingly, shrub dependant wildlife species could be affected longer than expected. Considering the size of the area and the grid spacing of the project, a large area of vegetation disturbance could be created in the short-term. We have concerns about the cumulative impacts on wildlife populations and would like to see the EA quantify the potential amount of disturbance in the project area. The cumulative impact analysis should include other adjacent activities (CD/WII project, feral horse populations, etc.).

The Haystacks project area is characterized as arid with sparse vegetation. Part of the area will be drilled with heliportable drills regardless of land status. Veritas has indicated that pickup trucks and recording trucks would primarily be restricted to existing roads and trails. Buggy drills and ATV's (used by surveyors) would be allowed off road and on shallow slopes. The shothole geophysical method would cause less crushing of vegetation than vibroseis methods; however, past experience with geophysical projects indicates that neither have created long-term adverse impacts to sagebrush or other vegetation. The only surface disturbance associated with the project is the 3½-inch to 4½-inch drill holes. Some vegetation may be crushed.

The EA has no section on upland game birds, or sage grouse in particular, but mentions that the project timing should have no impact on this species. Sage grouse have been observed in and around the project area during the late summer. Although we have no record of any sage grouse leks in the project area, if the project continues into the spring sage grouse leks searches should be done to confirm that no disturbance of this species would take place.

Sage grouse are known to inhabit about two-thirds of the project area during the spring. As water sources dry up by July, less than half of the area is suitable for use by sage grouse. During early April 2000, an early morning search for new sage grouse leks was conducted from Eagle Nest Draw through Manuel Gap. At that time no strutting grounds were located. Several early morning surveys to delineate this crucial habitat are planned during 2002; any new information would be shared with the Department. The proposed action incorporates measures to survey and protect sage grouse leks and nesting habitat (p. 6, EA). Activity is scheduled to occur between August 1 (or approval) and end by November 15. Should seismic operations be resumed in the spring (not likely as other wildlife stipulations would apply), surveys for sage grouse and other special status species would be required (p. 5, DR).

Although the operator plans to stagger vehicle use patterns to reduce vegetation disturbance, we expect new roads to be created since there are currently few roads in the area. Powder Rim had several miles of new roads created after a similar seismic operation in 2000, despite the area having a high density of road before the project. The EA should address reclamation of any new roads.

The operator has committed to stagger vehicle use patterns to minimize impacts to vegetation. Thus, no new roads will be created. Should any areas become disturbed, they would be reclaimed to the satisfaction of the BLM authorized officer.

The activity caused by this project could have a negative effect on hunters and animals during hunting seasons. Nonresidents and resident hunters spend significant amounts of money and time traveling to and within Wyoming to hunt big game. Antelope in this area are currently managed as a trophy population. Although the project is an temporary impact, the potential impacts to this recreational activity should be addressed in the EA. Ideally, the project should be completed before the hunting season or postponed while these seasons are ongoing. Because of safety is also an issue, we encourage all seismic crew members to wear hunter orange if the project continues during the hunting seasons.

Due to wildlife issues, the only time frame that geophysical operations can occur is August 1 through November 15. The EA recognized that hunters may be inconvenienced if hunting in areas where geophysical operations are occurring (p. 16). Not all of the area will have human activity on it at one time. Fourteen receiver lines of geophones will be laid at one time. After the center input line is shot, the outer geophone line is picked up by helicopter and dropped along a new line 3½ miles away. Aside from helicopter activity, two crews with ATV's will remove and reset geophones along the line. Disruptive activities on the ground should be minimal and only temporary animal displacement is anticipated. BLM added a measure to encourage Veritas to require wearing of hunter orange during the hunting seasons.

22. *Jill Morrow, Wyoming Chapter Sierra Club, Barbara Rugotzke*

We believe this project will not be compatible with the intent of the WSA designation. The project would authorize off road vehicles to pound the earth, destroy vegetation, create new roads, disrupt and possibly ruin habitat for wildlife and mare scenic values.

The respondent is misinformed about the proposed action. No off-road vehicles will be used in the Adobe Town WSA. The *Interim Management Policy and Guidelines for Lands Under Wilderness Review* specifically allows for geophysical operations, including the use of helicopters within WSAs if it meets the non-impairment criteria. Non-impairment means “a temporary use that does not create surface disturbance or involve permanent placement of facilities” can be allowed if such use can be easily and immediately

terminated upon wilderness designation. Hand laying geophones will not disturb the surface, trample vegetation, or otherwise detract from the wilderness characteristics found in the area.

Beyond the immediate damages expected from the exploratory project, it poses long-term threats to the wilderness values of the area. An oil and gas company is not going to invest money in exploration if the presence of oil and gas isn't likely. After exploration, oil and gas wells could soon pop up all over this pristine landscape. We urge BLM to consider Biodiversity's wilderness proposal in the Adobe Town region. We believe the area "as is" is worth more than the oil and gas it may yield. We remind BLM of its commitment to protect the WSA, not exploit and destroy these fragile lands.

As stated before, much of the geophysical project area lies in checkerboard lands where every other section is privately owned. Approximately 50 percent of the area has already been analyzed and approved for oil and gas development in the Continental Divide/Wamsutter II project and another portion of the project area is under analysis for oil and gas development in the Desolation Flats EIS. Geophysical operations also provide information on where not to drill exploratory wells, thereby eliminating unnecessary surface disturbance. Also see response to comment letter #16, last paragraph.

We urge BLM to undertake an EIS to determine how this proposed action will impact the environment. Law requires an EIS whenever impacts may significantly harm the environment as this project surely will. An EA is not sufficient for the scope of harm this exploration project will have. The EIS must study what will happen to the many vulnerable or rara animals and plants in the area (midget faded rattlesnake, black-footed ferret, Great Basin gopher snake). The EIS must address the effects of oil and gas exploration on the other wildlife species that call the area home, mountain lions, ferruginous hawks, black-tailed prairie dogs, wild horses, and burrowing owls. A full scale EIS would determine how the regions wilderness values and natural character would be affected. It is extremely important that this beautiful area receive full consideration for its irreplaceable values and wildness. It would be a travesty for oil and gas exploration to destroy its wildlife and wild character for short-term gains.

Please see BLM response to comments #5 and #16.

23. *Mike Long, U.S. Fish and Wildlife Service*

The EA does not provide sufficient information for the Service to concur with determination that this project is not likely to adversely effect any species listed under the Endangered Species Act of 1973, as amended. We request the following information in the form of a biological assessment.

Based on coordination with your staff, the following response has been submitted to your office. It is our understanding that a letter of concurrence will be forthcoming.

Blowout Penstemon. The EA states no listed plant species are present within the project area, but does not provide the survey information used to arrive at that determination. Given the presence of suitable habitat for the endangered blowout penstemon, we request the survey results for this species. If blowout penstemon is present, the Bureau should prohibit seismic activities in those areas.

Information for potential plant species was derived from the Wyoming Natural Diversity Database (WYNDD). According to their information, Blowout penstemon grows in "wind-carved depressions in sparsely vegetated active sand dunes." They also report that "*Penstemon haydenii* is absent from gently undulating dune fields that are not associated with steep mountain slopes or rocky ridges." It is found in

Wyoming south of the Ferris Mountains, around 60 miles away. Steep, blowing slopes with sparse vegetation are not present in the Haystacks Project area. During the BLM botanist's field survey of the area, no habitat was found for the species and no plants were detected.

Black-Footed Ferret. The EA does not identify if the seven white-tailed prairie dog towns within the project area are part of a larger complex of prairie dogs. If these towns are part of a larger complex which contains suitable habitat for the black-footed ferret (200 total acres of prairie dogs with a density of 8 burrows per acre), then black-footed ferret surveys in these towns may be necessary. We request information which describes the prairie dog complex, and whether or not that complex has sufficient size and burrow density to support ferrets. Alternatively, these towns, along with a buffer sufficient to prevent collapse of underground burrows from the shot blast, can be excluded from the seismic activity, or black-footed ferret surveys can be conducted prior to seismic activity in these towns.

Of the seven identified white-tailed prairie dog towns found within the project area, two are on private land, two extend across both private and public, and the other three are entirely on public land. Hole densities range between 3 and 7 holes per acre. These prairie dog towns do not constitute a complex because they are disjunct and are not part of a larger prairie dog complex.

Two and three miles north of the Haystacks are two prairie dog colonies which are about 3/4 mile apart. Each colony is twelve acres or less. Hole density averages are less than seven holes per acre.

A third colony of 27 holes covers about 12 acres and is just off the east side of the Haystacks and averages seven holes per acre. The nearest known colony to this town is about three miles farther east, near Mulligan Draw and outside the project area.

A fourth prairie dog colony is about four miles southwest, with 14 to 16 burrows on one side of a low ridge and 20 to 30 additional burrows on the other side of the ridge, with an average hole density of five holes per acre.

Another three colonies are mostly within the Adobe Town WSA. They may really be considered a single colony as the holes are widely dispersed, with some holes on saltbush flats and some holes on the sides of stable sand dunes. Hole densities are four to five holes per acre or less and the total surface area is less than 95 acres. Neither geophysical shot charges nor vehicle activity would occur in this area.

Based upon past experience with 2-D shot hole geophysical surveys, we are unaware of burrow damage or collapse during or after shot detonation. The 15-pound detagel charge is placed 60 feet into the hole and cuttings backfilled to the surface to prevent blowout and drive the shock wave downward.

Mountain Plover. The mountain plover is proposed for listing under the Act. However, this species was not discussed in either the threatened or endangered species, or special species status sections in the EA despite the presence of suitable habitat (page 13). Although the Bureau has determined there will be no impact to nesting mountain plovers because of project timing, the Service cannot concur with this determination, because the project timing was not identified in the EA. We recommend the Bureau determine whether the project may affect the mountain plover. Regulations at 50 CFR 402.10 allow for conferencing with the Service on any action that is likely to jeopardize the continued existence of any proposed species. We request the Bureau provide this office with information regarding timing of the proposed action along with measures which would minimize impacts to the mountain plover should the project occur between April 10

and July 10. Additionally, we wish to remind the Bureau that the mountain plover is currently protected under the Migratory Bird Treaty Act (MBTA).

BLM has corrected the text to include a discussion under the Threatened and Endangered Species sections found in both the Affected Environment and Environmental Consequences/Impacts (see Appendix A of the DR, Errata). As stated under the proposed action, geophysical operations are scheduled to be conducted in the late summer and fall of 2001 (year corrected in Errata) with the project scheduled to be completed by November 15.

Several patches of suitable plover habitat were identified on the north side of the Haystacks on both private and public land. A BLM biologist conducted inventories in late May and early June of this habitat and did not locate any mountain plover. South of the Haystacks in Adobe Town is considerable habitat suitable for mountain plover. Representative samples of these habitats were driven through and given considerable viewing time with a spotting scope and no plovers were found. Since the allowable window for conducting 3-D geophysical operations within the project area is August 1 through November 15, adverse impacts to mountain plover are unlikely. Appropriate surveys for mountain plover (and other species) would be required before operations could resume if the project is not completed by November 15.

Yellow-billed Cuckoo. On July 25, 2001, a distinct population segment of the yellow-billed cuckoo was designated as a candidate species for listing under the Act. This distinct population segment includes the project area. The information presented in Attachment 2 (page 2-2) regarding this species, status is incorrect.

The EA was released July 26, 2001. We have modified the text of the EA (see Errata) to address the yellow-billed cuckoo.

The only riparian habitats found within the project area are around several seeps and springs on the south side of the Haystacks. Vegetation associated with this water consists of Nebraska sedge, rushes, and several forb species. Two of the springs provide water for limber pine. A semi-riparian habitat area formed from an annual snow cornice is located on the east side of the Haystacks. Juniper, narrowleaf cottonwood, coyote willow, and limber pine are found on this two-acre parcel. No suitable habitat for the yellow-billed cuckoo has been identified within the geophysical project area and sightings of this species have not been recorded. The species' status shown on Attachment 2 (page 2-2) will be corrected.

Interrelated and Interdependent Effects. Of the 133 square miles within the project area, 82 square miles are Bureau lands. The ownership of the remaining surface is not identified. Under the Act, the Bureau is responsible for evaluating all potential impacts to listed species (on) private and State lands within the project area. If seismic activity on State and private lands within the project area would not occur, be feasible, or would occur to a lesser extent without exploration on Federal lands, the impacts to threatened and endangered species on the non-Federal lands must be considered an interrelated and interdependent effect.

BLM has considered the potential impacts to listed, proposed for listing, and candidate species on all lands regardless of ownership. Wildlife and plant inventories, prior to and including the year 2001, were conducted on all lands within the project. Specific inventories for listed threatened, endangered, and candidate plants and wildlife were conducted in the Adobe Town area since 1981 and none of the designated species were located.

The project area including the Haystacks has been inventoried for raptor nesting since 1978, with re-inventory work conducted about every four years. The entire area, regardless of land status, was inventoried for raptor nest sites during spring 2001. Golden eagle, ferruginous hawk, red-tailed hawk, and burrowing owl were located. The Timing Limitation Stipulation (TLS) provides protection during nesting and fledging of these raptor species. The burrowing owl occupies habitat within the WSA where only geophone laying activity is permitted and thus will not be affected.

Wildlife and habitat inventories for the Haystacks Project indicate that no (listed or proposed) threatened, endangered or candidate plant or wildlife are present and are not likely to be adversely affected by the proposed geophysical project. Therefore, the BLM affirms the “no effect” determination. Until there is plant or wildlife information indicating otherwise, preparation of a Biological Assessment for this geophysical activity is not anticipated. Burrowing owls are migratory and will likely have left the area.

24. *Mac Blewer (Wyoming Outdoor Council), Erik Molvar (Biodiversity Associates), Bart Koehler (Wilderness Support Center), Scott Groene (Greater Yellowstone Coalition), Jacob Smith (Wildlands Center For Preventing Roads), Johanna H. Wald (National Resources Defense Council), Harlin Savage (American Lands Alliance), Erin Robertson (Center for Native Ecosystems), Deborah Davidson (American Wildlands), Travis Still (Oil and Gas Accountability Project), Mary Forrester.*

The Proposed Action Threatens Big Game and Endangered Species. The EA only affords big game an abbreviated season “crucial...winter range” from mid November until April 30th. It is not clear that this window will be enough to adequately ensure the well-being of big game, especially given the drought and resulting forage loss experienced over the last two years in this state. In addition, the EA only pays lip service to the impacts the project may have on rare species such as the black-footed ferret, the swift fox, the greater sage grouse, the ferruginous hawk, the Great Basin gopher snake and the midget faded rattlesnake.

The seasonal big game winter range dates were established in agreement with the Wyoming Game and Fish Department. The BLM has established a statewide stipulation for activities within designated winter ranges from November 15 through April 30 (Appendix 7, Procedures For Processing Applications In Areas of Seasonal Restriction, Green River Resource Management Plan, Record of Decision, October 1997).

In accordance with U.S. Fish and Wildlife Service guidelines for suitable black-footed ferret habitat (prairie dog colonies of densities of 8 holes per acre or greater), no habitat suitable for the listed black-footed ferret occurs within the geophysical project area.

Swift fox, their tracks, or scat have not been observed on the Haystacks or within the project area. Given the low surface impact from shothole geophysical activity, no adverse effects to this species is anticipated.

Sage grouse have been documented on approximately two-thirds of the geophysical project. As water sources dry up during spring and early summer, some of this habitat is unoccupied from July through late fall. The proposed timing for geophysical activity is August through mid-November which may displace some birds during hunting season, but does not conflict with strutting or breeding periods for this species.

Ferruginous hawks as well as other raptors have completed nesting by August and are usually foraging more productive habitats or migrating out of the area by the time geophysical activities may commence. The geophysical proponent has agreed to avoid disturbing any raptor nest regardless of land status on which they are found.

The great-basin gopher snake (*Pituophis melanoleucus deserticola*) is very uncommon in the Haystacks area. During summer this species seeks subterranean habitats to avoid dessication and to seek food. Shothole seismograph activities should not adversely effect this species. Veritas has been instructed to advise their field crews that reptiles are not to be harmed or destroyed within the project area. The midget faded rattlesnake (*Crotalus viridus concolor*) does not occur in the project area. The uncommon rattlesnake found on the southern two-thirds of the project is the prairie rattlesnake (*Crotalus viridus viridus*).

*The Proposed Action violates established off-road vehicle policy. Off-road ATV and truck use associated with the laying of geophones and the setting of charges as outlined in the Proposed Action is not only damaging to desert shrub communities, but also violates established ORV policy for the region. The EA cites the Green River Resource Management Plan, which states, "Most of the planning area is open to consideration of geophysical activities **except where off-road vehicle use or explosive charges would cause unacceptable impacts....** Geophysical activities will generally be **required to conform to the off-road vehicle (ORV) designations and management area prescriptions**" (emphasis added). But the proposed action does **not conform with the ORV designations for the areas: The Monument Valley Management Area, covering a large proportion of the proposed project, is under consideration as an Area of Critical Environmental Concern, with proposed limitation of ORV use to designated routes. The Haystacks fall within an area nominated for wilderness. Any off-road surface disturbance in either of these two areas rises to the level of "unacceptable impacts."** The BLM admits in its EA that "Off-road vehicle use designations would be exceeded on public lands within the MVMA" (at p.16). Until such time as this ACEC is fully implemented, vehicles are limited to existing roads and trails as described in the Wyoming Off-Road Vehicle Policy. In either case, the proposed seismic activity would involve driving motor vehicles in off-road and off-trail areas to lay lines and set charges, in violation of the direction provided in the RMP and the Wyoming Off-Road Vehicle Policy.*

The use of geophysical vehicles in the project area does not violate the off-road vehicle policy or the off-road vehicle designations in the Green River RMP. The policy allows for authorized uses such as those associated with seismic operations. Page 4 of the EA states some of the management direction included in the Green River RMP. Additionally, the Green River RMP states: "In areas designated as either "limited" to designated roads and trails or "limited" to existing roads and trails for off-road vehicle use, motorized vehicles must stay on designated or existing roads and trails, unless allowed an exception by the authorized officer. This limitation applies to all activities involving motorized vehicles. Except for areas that are closed to off-road vehicle travel, some types of off-road motor vehicle use may be allowed by the authorized officer provided resource damage does not occur" (p. 15). The analysis in the environmental assessment for the Haystacks Geophysical Exploration Project determined that resource damage would not occur. Thus, the use of geophysical vehicles is in conformance with the guidance provided in the Green River RMP for off-road vehicle use, geophysical exploration, and the management of the Monument Valley Management Area.

The text for the discussion on page 16 has been clarified. The statement " Off-road vehicle use designations would be exceeded on public lands in the MVMA" has been removed and the following sentence added: "Additionally, the RMP recognizes that ORV use to conduct geophysical operations in areas where there are off-road vehicle use designations can be permitted following site specific analysis." Vehicles can leave buggy paths in some areas; however, those paths recover within a couple of years depending upon weather.

The Proposed Action does not set appropriate limitations on off-road travel. The EA argues that the RMP allows "site-specific authorizations for off-road vehicle use subject to appropriate limitations to protect various resources identified during the Analysis of Proposed Actions" (emphasis added). We concur with this analysis. Resources identified by BLM included wildlife, cultural, watershed, and scientific values. In

addition, most of the project area was identified by citizens' groups to possess wilderness qualities as identified in detail in the Citizens' Wilderness Inventory of Adobe Town, which was received by BLM on 7/23/01. Despite the fact that BLM has received this significant new information concerning previously undocumented wilderness resources within the proposed project area, the BLM failed to acknowledge the presence of potential wilderness in the EA. The BLM has in fact imposed appropriate limitations only within the Adobe Town WSA, which comprises a small fraction of the project area. But BLM has failed to extend these appropriate limitations to wilderness-quality lands outside the WSA identified in the Citizens' Wilderness Inventory of Adobe Town. In this failure, the BLM has proceeded in what could be argued as an arbitrary and capricious manner, withholding appropriate protections from some wilderness-quality lands while providing them to others.

The analysis in the EA documented that no long-term impacts would occur to resources in the project area. The proposed geophysical project will not adversely affect potential wilderness characteristics, should they be identified, and therefore would not disqualify the area from further consideration as a Wilderness Study Area. Similar activity has occurred in and around the project area, including portions of the area inventoried in the "Citizens' Wilderness Inventory of Adobe Town." Little or no evidence of this activity exists today.

The EA fails to accurately disclose impacts associated with 3-D seismic testing. The Veritas Haystacks EA fails to present accurate information regarding the impacts of 3-D seismic testing of the type proposed by Veritas GDC. The EA characterizes the vibrator buggies as "ATVs." Far from being one-passenger, small four-wheeled motorcycles, the vibrator buggies that form the basis of the project weigh 26 tons, and any use of such vehicles off road will create enormous impacts on desert shrub communities as well as archaeological and cultural resources. In locations where the vibrator is used, the entire 52,000-pound weight of the vehicle is brought to bear on the vibrating pad, resulting in irreversible soil compaction. There may be as many as 30 vibrator pad deployments along a given line. These vibrators are also particularly prone to hydraulic fluid leaks; the potential for toxic chemical spills has not been adequately addressed in the EA.

The shothole method, not vibroseis, will be used in this project. The drill-mounted buggies weigh less than a pickup truck and are mounted on oversized tires to dissipate compaction. In rough areas, portable drills will be transported by helicopter to avoid surface damage to steep slopes. Veritas has committed to spreading out their vehicle traffic to avoid creating permanent tracks.

The BLM has failed to consider roadless and wilderness qualities as required by FLPMA. In its Veritas Haystacks EA, the BLM has violated FLPMA and agency policy by failing to conduct and maintain an adequate and reliable inventory of roadless lands in the Adobe Town region. FLPMA requires the Secretary of the Interior to:

*"prepare and maintain **on a continuing basis** an inventory of all public lands and their resources and other values (including, but not limited to, outdoor recreation and scenic values), giving priority attention to areas of critical environmental concern. This inventory **shall be kept current** so as to reflect changes in conditions and to identify new and emerging resource and other values." 43 U.S.C. § 1711(a) (emphasis added).*

For public lands administered by the BLM, the Secretary has delegated this inventory responsibility to the BLM. Roadless areas, as potential wilderness, are known to be a significant resource and to possess significant recreation, wildlife, and scenic values. See, e.g., BLM manual H-6310-1, Wilderness Inventory and Study Procedure, Section .06 (Policy), noting that Wilderness is a resource which fits within the

framework of multiple-use on the public lands. Consequently, the BLM has interpreted the FLPMA inventory provision to require the agency to:

*“prepare and maintain **on a continuing basis** an inventory of certain public lands **to determine the presence or absence of wilderness characteristics.**”*

BLM Manual H-6310-1, Section .06A (emphasis added). The National BLM Director has also interpreted the FLPMA inventory requirement to obligate the agency to maintain a current inventory of possible roadless areas on BLM lands:

*Authority for additional [roadless] inventories is provided by FLPMA in Sections 102(a)(2) and (8), 201(a), and 202(c)(4) & (9), and land use planning in Sections 202(a), (b), and 205(c). Among other things, these sections direct BLM to “**preserve and protect certain public lands in their natural condition.**”*

The proposed geophysical project will not adversely affect potential wilderness characteristics, should they be identified, and therefore would not disqualify the area from further consideration as a Wilderness Study Area. A review of the Haystack EA shows that the proposal will not degrade the potential existence of wilderness values or the roadless character cited in the “Citizens’ Wilderness Inventory of Adobe Town”. In regards to roadless areas, there will not be any additional roads developed as part of this project. The naturalness of the area will remain the same. Although there will be some human impacts resulting from this project, they will be substantially unnoticeable in the area as a whole and will not impact the naturalness of the area. Any solitude or primitive and unconfined types of recreation opportunities will not be changed due to this project. Any supplemental values that may exist would also not be affected (pgs. 4, 5, 17, 18 EA).

Instruction Memorandum No. 96-176 (September 6, 1996, emphasis added). Most of the roadless areas identified in the Citizens’ Wilderness Inventory of Adobe Town have never been thoroughly evaluated by the BLM for roadless conditions or wilderness values in any previous roadless area inventory or wilderness study of public lands in Wyoming. The EA does not cite any such study, nor does it present any reliable analysis of these lands to document the current on-the-ground conditions with regard to roadless or undeveloped character or wilderness values. Thus, the BLM has failed to comply with its requirement to maintain, on a continuing basis, a reliable inventory of the roadless, wilderness, and recreation values of the undeveloped lands within the Veritas Haystacks project area.

See response above.

According to BLM’s Wilderness Inventory and Study Procedures, the submission of such requests from the public suggesting that existing plans do not adequately identify public lands that have wilderness characteristics requires BLM to review and field-check these materials. The Citizens’ Wilderness Inventory of Adobe Town and its accompanying cover letter constitute precisely such a request. If BLM determines that the area may have wilderness characteristics, and if actions are proposed that could degrade the wilderness values or the roadless character so as to disqualify the area from further consideration as a WSA... the BLM should, as soon as practicable, initiate a new land use plan or plan amendment to address the wilderness values (H-6310-1 at p.5). So far, BLM has failed to address these wilderness qualities, and now proposes to move forward with actions that could degrade wilderness values, in direct violation of BLMs own Wilderness Inventory Study Procedures.

The “Citizens’ Wilderness Inventory of Adobe Town” will be reviewed and field checked as time allows. Since the seismic activity proposed in this EA will not affect wilderness characteristics, further review is not immediate in relation to the proposed action. Review and field check of new information is in conformance with the Wilderness Inventory and Study Procedures Handbook. Since this action will not degrade any areas that may have wilderness values, a land use plan amendment to address wilderness values is not necessary.

In the Citizens’ Wilderness Inventory of Adobe Town, which BLM received by July 23, 2001, there is substantial evidence demonstrating that there are in fact roadless areas outside Adobe Town WSA that meet wilderness criteria. The EA does not offer any evidence or analysis to refute our conclusions concerning the presence of roadless areas. In the Veritas Haystacks EA the BLM has ignored this new information rather than evaluating it. NEPA does not allow agencies to ignore key information submitted by the public. See, e.g. 40 C.F.R.β 1502.9(c) (obligation to address significant new information) and β 1503.4 (agency’s duty to respond to public comment). These obligations have not been met for the information provided by Biodiversity Associates and others on the existence of wilderness-quality roadless areas in the Veritas Haystacks project area.

See response above and BLM’s response to comment letter #1.

*Half of the project area lies within the bounds of the Continental Divide--Wamsutter II Natural Gas Project. The Record of Decision for this project states that “Cultural resource inventories and other surveys for sensitive environmental resources will be conducted **prior** to implementation as directed by the BLM...” (emphasis added). But BLM has so far failed to survey or address wilderness values outside Adobe Town WSA as identified in the Citizens’ Wilderness Inventory of Adobe Town, and wilderness values are among the most sensitive of environmental resources. Thus, the BLM’s failure to survey for wilderness resources within the project area fails to comply with the Continental Divide--Wamsutter II ROD.*

See above response.

On December 22, 2000, the Solicitor of Interior issued an explicit memorandum in regard to potential wilderness under the management of the Rock Springs Field Office, stating that:

*“BLM **may not** refuse to consider credible new information which suggests that WSA boundaries identified in the late 1970's do not include all public lands within the planning area that have wilderness characteristics and are suitable for management as wilderness.”*

The instructions in the memorandum were amplified and reinforced in BLM Instruction Memorandum No. 2001-075, which states:

*“BLM officials must fully consider the conclusions and requirements of the Solicitor’s opinion when scoping and preparing plan amendments, plan revisions, and supporting environmental documents. They **must also comply** with the Solicitor’s Opinion with respect to wilderness study areas (WSAs) or other unique and important resources that merit protection.”*

Incredibly, even in the face of an overwhelming quantity of evidence that suggests that the Veritas Haystacks project area includes wilderness-quality lands, the BLM has failed to address wilderness at all in the Veritas Haystacks EA. This is a shortcoming of immeasurable importance in view of the legal and policy obligations that spring from NEPA and FLPMA.

See above response.

The Proposed Action would degrade roadless and wilderness qualities in the project area. Under the Proposed Action put forward in the EA, truck or buggy-mounted drilling rigs would be driven cross-country. According to the EA, past experience indicates that this type of activity leads to the following result: “some of the shrub plants in the vehicle paths are killed but the underlying grasses and forbs survive” (at p. 5). BLM further admits that “There is potential for use of buggy paths by hunters and other recreationists using ORVs, particularly in the first year” (EA at p. 16). This would potentially lead to the creation of new vehicle roads and trails that could then remain open to motorized travel indefinitely. These new vehicle routes would substantially impact the roadless and undeveloped character of the landscapes within the project area, possibly leading to the development of new vehicle routes. This activity would unquestionably degrade the wilderness qualities of the area.

See above response.

*Within Adobe Town WSA, “Walking and temporarily laying geophones along receiver lines would not detract from the naturalness...No cumulative impacts to wilderness values are expected” (EA at p.15). But a different standard is applied outside the WSA. Here, “Crushing of vegetation, and temporary impacts from use of equipment is expected and is considered a necessary and due impact when conducting geophysical operations” (EA at p.16). The assertion that these impacts are necessary and due outside the WSA is demonstrably false in light of the fact that these same impacts will be avoided entirely within the WSA. The application of different standards for “necessary and due” impacts inside the WSA and on neighboring wilderness-quality lands is potentially arbitrary and capricious. Impacts to the scenic, roadless, ecological, and recreation values contained in the Proposed Action are **equally unacceptable** on lands outside Adobe Town WSA that have been proposed for wilderness in the Citizen’s Wilderness Inventory of Adobe Town.*

See above response. Public lands outside of the WSA have not been reviewed to determine whether they contain wilderness characteristics as proposed by Biodiversity, et al.

The BLM has failed to evaluate an adequate range of alternatives as required by NEPA. NEPA requires BLM to “rigorously explore and objectively evaluate” all reasonable alternatives to proposed federal actions. See 40 C.F.R. §§ 1502.14(a) and 1508.25(c). In particular, federal agencies must explore alternatives to proposed actions that will avoid or minimize adverse effects on the environment, 40 C.F.R. § 1500.2(3), alternative kinds of mitigation measures, 40 C.F.R. § 1508.25(c)(3), alternatives that would help address unresolved conflicts over the use of available resources (e.g. roadless areas and/or potential wilderness), 40 C.F.R. § 1501.2(c), and other reasonable courses of action, 40 C.F.R. § 1508.25(c)(2).

Strangely, the Veritas Haystacks EA evaluates only two alternatives: (1) the proposed action, and (2) a “no action” alternative that assumes that wildcat drilling will take place. The BLM has failed to evaluate an alternative that would provide appropriate limitations to protect wilderness resources within the wilderness-quality lands surrounding Adobe Town WSA.

BLM considered an alternative that would deny seismic activity within the WSA (p. 8, EA). Consideration of the no action alternative recognized that denying seismic proposal could lead to proposals for wildcat wells. The purpose of geophysical operations is to acquire data on whether or not there are pockets of hydrocarbons and where they are located which results in unnecessary surface disturbance (p. 1, EA). Without that knowledge there is a likelihood that wildcat wells could be proposed. The geophysical project

will not adversely affect potential wilderness characteristics, should they be identified, and therefore would not disqualify the area from further consideration as a Wilderness Study Area.

*The BLM has failed to consider an alternative that would permanently protect the wilderness and roadless values that currently are found in the study area. The EA cites the Green River Resource Management Plan, which states, “Most of the planning area is open to consideration of geophysical activities **except where off-road vehicle use or explosive charges would cause unacceptable impacts...** (emphasis added). The off-road vehicular activity inherent to the Proposed Action constitutes unacceptable impacts that would degrade wilderness qualities within an area proposed for wilderness in the Citizens’ Wilderness Inventory of Adobe Town. For areas determined to have wilderness qualities, and the impacts from a proposed action could degrade the wilderness values or roadless character, WISP states that the BLM must consider in the NEPA document an alternative of mitigating or relocating the proposed action to avoid or minimize impacts on wilderness values; and must also consider the alternative of postponing a decision on the proposed action until the wilderness values can be addressed through a new land use plan or plan amendment, which process should be expedited and completed as soon as possible” (at p. 6). No such alternatives have thus far been considered in the Veritas Haystacks EA. New NEPA documentation is needed to draft and evaluate such alternatives.*

Since the proposed action will not adversely affect potential wilderness characteristics, additional alternatives do not need to be addressed. Should BLM review find further public lands suitable for wilderness consideration, analysis would be conducted through the land use planning process.

The BLM must now draft and evaluate additional alternatives. It must evaluate an “all-wilderness” alternative in which these lands would be withdrawn from any surface disturbance that would impact wilderness qualities. The BLM must also draft and evaluate “Minimum Impact” alternatives that would require hand-laying of seismograph cables and the use of helicopters to drill and set charges, while restricting vehicle use to existing roads and trails in accordance with the Wyoming Off-Road Vehicle Policy. Such an alternative would not only be reasonable, but also would be the alternative that best allows oil and gas exploration by private corporations while protecting wildlife, roadless, potential wilderness, scenic, and other resource values of interest to the public at large. BLM’s failure to evaluate such an alternative constitutes a violation of NEPA, which must be rectified by the issuance of additional NEPA documentation.

See above response.

*The BLM must prepare supplemental NEPA documentation, including a revised or supplemented Resource Management Plan. NEPA regulations require the BLM to prepare supplemental documentation when “There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.” The Citizens’ Wilderness Inventory of Adobe Town constitutes just such significant new information and must be considered by BLM in its planning efforts. The BLM is clearly required to postpone actions that would degrade wilderness qualities until such time as the applicable Resource Management Plan can be brought up to date. BLM’s own policy states unequivocally that, “Where the NEPA process shows that a proposed action would disqualify the area from further consideration as a WSA, BLM should, subject to valid existing rights, **postpone the action until wilderness values can be addressed through a new land use plan or plan amendment**, which process should be expedited and completed as soon as possible” H-6310-1 at p.6 (emphasis added). Thus, the Green River Resource Management Plan has been rendered obsolete by the submission of evidence of previously undocumented, undeveloped lands of wilderness quality, and a new Resource Management Plan is needed before projects that affect wilderness qualities such as the Veritas Haystacks Seismic Project can be allowed to proceed.*

See above response.

A full Environmental Impact Statement is required for the Veritas Haystacks Project. NEPA regulations explicitly delineate statutory requirements for Environmental Impact Statements. These regulations state: “As required by sec. 102(2)(C) of NEPA environmental impact statements are to be included in every recommendation or report on proposals for legislation and other major federal actions significantly affecting the quality of the human environment.”

40 C.F.R. § 1502.3. The Veritas Haystacks project meets these criteria in every way. The proposed project area covers 133 square miles of public and private lands, qualifying it as a “major” federal action. If the Proposed Action is allowed to go forward as it currently stands, it would significantly degrade the scenic and potential wilderness qualities found within the area, causing an irretrievable loss of undeveloped and wilderness-quality lands that constitutes a significant and long-term effect on the human environment. For these reasons, a complete Environmental Impact Statement is absolutely required for the Veritas Haystacks Seismic Project.

See above response.

Federal courts have ruled that federal projects that diminish the wild character of roadless areas constitute a significant impact to the human environment and an irretrievable commitment of resources, which require an EIS, not merely an EA. For example, in Wyoming Outdoor Coordinating Council v. Butz (484 F.2d 1244, 1249-1250, 10th Cir. 1973), the courts ruled that logging in a roadless area, even if not pristine and traversed by numerous jeep roads, significantly affects the human environment and requires an EIS; in National Audubon Society v. U.S. Forest Service, (4 F.3d 1072, 1078-1079, 9th Cir. 1993), the courts concluded that the decision to harvest timber on a previously undeveloped tract is “an irreversible and irretrievable decision” which could have “serious environmental consequences” therefore requiring an EIS. The area encompassed by the Veritas Haystacks Seismic Project constitutes a roadless areas under the definition of BLM Handbook H-6310-1 (at p.9), and has been shown to possess wilderness qualities in the Citizens’ Wilderness Inventory of Adobe Town. The decision to allow off-road travel by 52,000-pound vibrator buggies would result in significant visual impacts that would affect the area’s eligibility for wilderness. This constitutes an irreversible and irretrievable commitment of wilderness resources, and requires the hard analysis of an EIS.

See above response.

The initial Veritas Haystacks EA contains numerous shortcomings, and by virtue of these shortcomings, it fails to comply with federal mandates through NEPA and FLPMA. In order to comply with federal law, the BLM must either fully evaluate wilderness qualities and make the required changes to the EA, withdraw the project, or provide appropriate limitations on the project (as are provided within Adobe Town WSA) throughout all parts of the project area recommended for wilderness within the Citizen’s Wilderness Inventory of Adobe Town.

See above response.

Because of the extremely limited wilderness resources found on BLM lands in Wyoming, and because of the outstanding character of the wilderness qualities within the proposed project area, it is imprudent to proceed with industrial activities of any kind within the study area. Until BLM produces a full EIS on the proposed project, WOC stands opposed to seismic testing of any kind within Adobe Town WSA or the surrounding

lands that have been identified as being wilderness-quality in the Citizens' Wilderness Inventory of Adobe Town. Wild lands have spiritual and natural values well beyond the short-term profits reaped by energy companies from oil and gas.

Perhaps Wallace Stegner summed it up best when he stated, "Something will have gone out of us as a people if we let the remaining wilderness be destroyed; if we permit the last virgin forests to be turned into comic books and plastic cigarette cases; if we drive the few remaining members of the wild species into zoos or to extinction; if we pollute the last clear air and dirty the last clear streams and push our paved roads through the last of the silence, so that never again will Americans be free in their own country from the noise, the exhausts, the stinks of human and automotive waste. And so that never again can we have the chance to see ourselves single, separate, vertical and individual in the world, part of the environment of trees and rocks and soil, brother to other animals, part of the natural world and competent to belong in it...The reminder and the reassurance that it is still there is good for our spiritual health even if we never once in ten years set foot in it. It is good for us when we are young, because of the incomparable sanity it can bring briefly, as vacation and rest, into our insane lives. It is important to us when we are old simply because it is there-important, that is, simply as an idea." (The entire "Wilderness Letter" of Stegner from which this is taken is enclosed as an attachment.)

Thank you for your comment.