

SUMMARY OF THE WYOMING OUTDOOR COUNCIL REPORT “EVIDENCE OF IMPAIRMENT OF AIR QUALITY RELATED VALUES IN THE BRIDGER WILDERNESS AREA, WYOMING”

1. The 428,169-acre Bridger Wilderness Area is located in west-central Wyoming near the Town of Pinedale, in the Bridger-Teton National Forest. It is administered by the U.S. Forest Service.
2. Just to the west of the Bridger Wilderness lies the Upper Green River Valley where significant oil and natural gas development is occurring, especially in the Jonah and Pinedale Anticline fields.
3. Under the Clean Air Act, the Bridger Wilderness Area is afforded special protection to safeguard “air quality related values,” which includes protecting visibility from impairment by haze. Protected airsheds such as the Bridger Wilderness Area are designated as “Class I” areas. The Forest Service as the Federal Land Manager of the area has an “affirmative responsibility” to protect air quality related values in the Bridger Wilderness Area. In addition to the Clean Air Act, the Wilderness Act provides additional direction to the Forest Service, requiring it to insure Wilderness Areas are “unimpaired for future use and enjoyment as wilderness.”
4. There is increasing evidence that visibility and perhaps other air quality related values have been impaired in the Bridger Wilderness and that additional impairment is likely in the future, especially due to the intense oil and natural gas development that is occurring in this area.
5. Evidence of impairment comes from a number of sources that are addressed in the report, including:
 - A Forest Service report that analyzed approximately 3,000 photographs from monitoring stations in the area which found that “In some cases the photographs pretty clearly show a haze in the class I area” The analysis could not definitively show the haze was caused by local natural gas development; however, the camera stations were not designed in a way that would allow such attribution.
 - Citizens living near the Bridger Wilderness Area have taken a number of photographs that show haze in the area. Some of these photographs show haze that is associated with oil and gas development activities. These photographs were taken during the late fall, winter and early spring when forest fires were unlikely to have contributed to the haze. Some of the photographs show that when haze fills the Upper Green River Valley, it is readily apparent from within the Bridger Wilderness Area. A number of these photographs are included in the report.
 - BLM has prepared numerous environmental impact statements (EIS) that predict the impacts of oil and gas development on visibility conditions in the Bridger Wilderness. These EISs have repeatedly predicted substantial and significant impacts to visibility in the Bridger Wilderness due to the direct impacts of the oil and gas development projects, as well as due to cumulative impacts—the impacts of an oil and gas development project added to the impacts from other

emissions sources in the region. The oil and gas projects analyzed in these EISs will lead to the drilling of more than 80,000 additional oil and gas wells in Wyoming, approximately 31,000 of these wells will be drilled in southwest Wyoming, and nearly 10,000 wells will be drilled in the Upper Green River Valley in close proximity to the Wilderness Area. Evidence shows that oil and gas development in close proximity to the Bridger Wilderness has a disproportionate effect on air quality, that is, “proximity counts.”

- There are also many anecdotal observations of increasing air pollution and haze that have been made by residents in the Upper Green River Valley. Some of these observations have been reported in numerous newspaper reports. Many residents and newspaper accounts attribute this haze to oil and gas development. Some of these newspaper accounts are included with the report.
 - While the local monitoring station for regional haze impacts in the Bridger Wilderness (the IMPROVE site) has not documented visibility trends in the area, this site is acknowledged by the Forest Service to be located in a way that would not allow it to document the impacts of local natural gas development. Moreover, a related website supported by the Western Regional Air Partnership (WRAP) shows that visibility in the Bridger Wilderness Area is currently reduced compared to natural conditions.
 - An additional report from the Forest Service and another from a Bureau of Land Management working group that deals with natural gas development on the Pinedale Anticline have also provided evidence of impairment of air quality related values. The report from the BLM working group shows that some alpine lakes in the Wilderness are showing signs of being acidified and other lakes are showing signs of excess fertilization (eutrophication is starting to occur). The Forest Service report from the Bridger-Teton National Forest confirms these findings.
6. The weight of the evidence from these sources shows that: (1) impairment of air quality related values (especially visibility) has already occurred in the Bridger Wilderness Area; and (2) oil and natural gas development in the area, especially development in close proximity to the Bridger Wilderness Area, either already has or is likely to cause significant impairment in the future.
 7. Consequently, the Forest Service should meet its “affirmative responsibility” to protect air quality related values in this remarkable and wild area. An important component of meeting this responsibility should be certification of impairment to the Wyoming Department of Environmental Quality. The Forest Service should certify that impairment has occurred so that the strongest pollution controls possible can be put in place so as to meet the requirements of the Clean Air Act and the Wilderness Act for protection of this priceless “Class I” Wilderness Area.