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Terri A. Lorenzon, Director
Environmental Quality Council

Crook County Farm Bureau
P.O. Box 488
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June 20, 2008

Mr. Dennis H. Boal, Chair of the Environmental Quality Council
122 West 25th Street, Herschler Bldg., Room 1714
Cheyenne, WY 82002

Dear Mr. Boal,

The Crook County Farm Bureau Federation represents almost 400 agricultural producers in Crook County and we are the voice and advocate for the agricultural industry in Crook County. As such we have become aware that your council is considering a petition to overlay a state designation of Rare and Uncommon upon 11,000+ acres of the Black Hills National Forest in the Sand Creek watershed. We feel that this petition for such a designation is not only unnecessary, but flies directly in the face of the Multiple Use and Sustained Yield Act of 1960.

We understand that the petitioners, Friends of Sand Creek, are among the members of the Sand Creek Country Club and we appreciate their concern for the water quality of Sand Creek which rises just above them on Ranch A and flows through and past their dwellings on the Country Club. We certainly do not want to see Sand Creek compromised any more than they do.

This petition appears to be based mostly on four criteria, the first being scenery. The area is beautiful, but not any more so than most other areas of the Black Hills National Forest. The attribute of scenery is certainly not a compelling reason to restrict mineral exploration or development in this area any more than the entire Black Hills.

The second criteria is wildlife values, especially critical winter habitat for mule deer. Even though some of the 11,000 plus acres are classified as winter big game habitat in the Forest Plan, our rancher members assure us that you will find very few deer in this high elevation area in the winter. Most of the winter habitat is in the lower elevation areas and are mostly comprised of private lands. The deer population in this area is almost entirely white tail deer and they are at very high population levels, thanks in large part to the excellent habitat provided on private lands in their historical wintering areas.

A third criteria is fisheries, including finescale dace in the upper regions and potential effects on the Class I trout stream in the lower reaches. After European settlement of the Black Hills, upper Sand creek was a hotbed of both placer mining and some underground mining. The finescale dace are still there 100 years later and with the environmental safeguards now in place, which were not there even 50 years ago, the potential harm to their habitat is virtually nil. There is even

some question whether Sand Creek is still listed as a Class I stream by Wyoming DEQ as one of their recent revision of the standards maintained that no streams in the state would be given that status. For a majority of its reach, Sand Creek is an ephemeral stream, with live water at the head and only rising to the surface again on Ranch A, immediately above the Sand Creek Country Club. Below the springs on Ranch A, Sand Creek is a brown trout fishery, separated by over 10 miles of mostly dry streambed from the headwaters. The potential for properly managed mineral development in the headwater region to adversely affect this fishery is mostly conjecture.

A final criteria for Rare and Uncommon status is based on botanical values such as late successional forest and some "ice age refugia" plant associations considered rare. These same plant associations are also present on the nearby South Dakota side of the Black Hills Forest. The Forest Plan of the Black Hills has a significant portion of this area designated as late successional forest management emphasis and the Forest Plan has already designated two Botanical Areas, in Dugout Gulch and Spotted Tail drainages. The fear of mineral development being allowed to compromise these values by the Forest Service strains any serious level of credibility. There is a real concern that using these botanical values to restrict other multiple use activities will lead to further restrictions on the grazing privileges upon which the grazing permittees rely for a livelihood.

Our ranching members, many of whom have grazed in this portion of the Black Hills since it was formed, have great faith in the ability of the Forest Service to manage all the resources of this area without overlaying a state restriction in addition. Also, the Bureau of Land Management has strict permitting processes for subsurface minerals as well as the State of Wyoming regulatory processes already in place. This petition for Rare and Uncommon status just does not have valid and compelling rationale behind it.

In summary, the Crook County Farm Bureau Federation urges you not to consider the Rare and Uncommon petition for the Sand Creek area of the Black Hills National Forest.

Sincerely,

Frank Hawken, President