

**FILED**

JUN 18 2008

Terri A. Lorenzon, Director  
Environmental Quality Council

995 Oak Creek Rd.  
Aladdin, WY 82710

June 18, 2008

Mr. Dennis M. Boal, Chair of the Environmental Quality Council  
122 W. 25<sup>th</sup> Street, Herschler Bldg., Rm. 1714  
Cheyenne, WY 82002

Dear Mr. Boal,

I am one of the sons in W. W. Thompson & Sons, Inc., grazing permittees on the Sand Creek Allotment on the Black Hills National Forest. Our grandfather, N.H. Thompson, homesteaded in what is now part of the Black Hills National Forest (BHNF) in the mouth of Thompson Gulch in 1888. This predated the formation of the Black Hills National Forest. He traded his original homestead to the Forest Service for dry land prairie on the Rifle Pit Divide, immediately adjacent to the BHNF, but kept a grazing permit which is still in the family.

Since that time, we have seen a definite successional change in the vegetation of the Sand Creek area and in the stream flow of Sand Creek. In the homestead days it was an open stand of mature Ponderosa pine, with ample herbaceous understory and Sand Creek was a perennial stream most of the year. With each succeeding change in management policy by the government, the pine stands have become more dense and research will show that Sand Creek is now yielding approximately 40% less stream flow than it did 100 years ago. This change is due to increasingly restrictive policies on timber harvest and in the cessation of natural fire in this ecosystem. A huge percentage of the precipitation in this watershed is tied up in standing bio-mass.

In addition, the Sand Creek area has become a magnet for extremist environmental groups, all seeking to put increasing restrictions on the multiple uses of this portion of the BHNF. This started in the mid 1970s with the Roadless Area Review and Evaluation (RARE). The area was **NOT** selected by Congress to be a designated Wilderness area. It was again evaluated for wilderness status under RARE II with the same result. It was **NOT** selected for wilderness status. This area was then proposed to be a Research Natural Area by the environmental community. It was **NOT** selected for this even more restrictive status. Then it was selected as a "roadless area" under the Clinton administration despite the fact that it contains more than 25 miles of old vehicle roads and jammer roads and at least six developed springs and allotment fences. During this time, the Forest Service completed two different phases of their Forest Land Management Plan, adding two different Botanical Areas and classifying most of the remainder of our allotment as Late Succession Forest.

Now comes a proposal by the "Friends of Sand Creek", in reality certain, but not all, members of the elite Sand Creek Country Club, to have your Environmental Quality Council overlay a state designation of Rare and Uncommon over the Forest Plan of the BHNF. This petition gives a

rather lengthy description of the natural resources of the area, much of it taken from the Forest Plan. We, the grazing permittees, do not see a clear, valid and compelling argument being made in the petition that would warrant such additional restriction being placed on the area in addition to the goals, objectives, standards and guidelines of the Forest Plan. While not directly aimed at our grazing privileges of the area, these increasing restrictions undoubtedly lead in that direction.

My brother Wes (the other son in W. W. Thompson & Sons ) and the other grazing permittees have met with the instigating members of the Sand Creek Country Club and with Marsha Dunsmore and the board of the Powder River Basin Resource Council. More than once they said, "We want to do something nice for Northeast Wyoming." In our opinion, there is nothing "nice" in a Rare and Uncommon designation for the citizens and forest users of Crook County and potentially there is great harm to our fragile economy. We feel there are more than sufficient environmental safeguards built in to the current Forest Plan, the BLM requirements for mining operations and the existing state regulatory processes.

We concur with the petitioners that Sand Creek is a wonderful stream through the Sand Creek Country Club and do not want any harm to come to it. We agree that the other natural resources of the Sand Creek watershed are wonderful but entirely common and have remained so for over 100 years of management. This Rare and Uncommon designation is just plain not needed and potentially harmful. Thus, in your deliberations at the scheduled June 24 meeting, we urge you to "do something nice for Northeast Wyoming" and **NOT** select this area for consideration as Rare and Uncommon.

Sincerely,

*/s/ Hugh C. Thompson*

Hugh Thompson, Grazing Permittee

cc: Governor David Freudenthal