

July 7, 2010

Environmental Quality Council
Mr. Tim Flitner, Chair
122 W. 25th Street, Herschler Bldg., Rm. 1714
Cheyenne, WY 82002

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Jim Ruby, Executive Secretary
Environmental Quality Council

Mr. Flitner and members of the Environmental Quality Council,

We, the Crook County commissioners are aware that a petition has been submitted to your council to designate approximately 17,000+ acres of the Sand Creek watershed, Black Hills National Forest (BHNF), as Very Rare and Uncommon. This petition is based on a compilation of various resource data, much of which was extracted from the Black Hills National Forest (BHNF) Management Plan. Obviously, the Forest Service is already using the data to manage the area. The petition, in our opinion, fails to make a compelling nexus between the wonderful but common natural resources of the Sand Creek area and the potential for resource damage from mineral exploration, possible development and production. We support the BHNF being managed under the Multiple-Use Sustained Yield Act of 1960 along with the subsurface management by the Bureau of Land Management. The Crook County Commissioners do not support granting to the Upper Sand Creek Area Very Rare and Uncommon Status by the Wyoming Environmental Quality Council.

Granting the Very Rare and Uncommon designation for the Sand Creek Area in Crook County will have no advantage to the citizens of Wyoming, those in Crook County in particular. This designation will restrict certain types of potential resource utilization and could have negative implications for current and historical resource uses.

Types of future resource utilizations include gold and uranium mining. Gold and uranium are known to be located in the area. Should this Very Rare and Uncommon designation be granted, many types of mining could severely restricted. This will deprive Crook County area residents needed jobs. Crook County and the State of Wyoming will also be deprived of needed property valuation which drives local tax revenue. Crook County does not enjoy the benefits of the current mineral boom to the extent of other Wyoming counties. Stopping mining will keep current and future Crook County and Wyoming citizens from enjoying a higher quality of government services.

The area under consideration for Very Rare and Uncommon status is currently utilized by agricultural producers. We realize that this type of designation should technically not affect agricultural uses. However, reality shows that similar types of designation have provided impetus for reducing historical uses, including agricultural utilization. For example, wilderness designations have directly or indirectly caused decreases in livestock grazing within lands with that designation. This will affect other lands farmers and ranchers use, decreasing agricultural income in the area. This decrease in income will lower local purchases, which in turn will lower income to local governments.

The area under consideration could maintain its current characteristics without granting it any special status. Technologies exist which allow resource utilization without causing

environmental damage. Granting Very Rare and Uncommon status to the upper Sand Creek area will provide no advantage to Crook County citizens and, in fact, would provide several serious disadvantages to citizens we have been elected to serve.

We also request an economic analysis of the potential effects to the Crook County economy should this petition go forward. This type of information is vital to Crook County residents. We, as decision makers, must know what type of ramifications decisions such as these can have on persons that elected us. The EQC has funded other types of studies when additional information was needed. We feel additional information is needed for this petition.

Again, this Very Rare and Uncommon designation is not needed and we urge you to stop this process now by not accepting the petition for consideration.

Sincerely,


John Moline, Jr., Chair Kelly Dennis, Member James Hadley, Member

CC: Governor David Freudenthal
Dept. of Environmental Quality
Rep. Mark Semlek
Sen. Charles Townsend