

The Wyoming Farm Bureau is an agricultural organization which represents over 2,500 members state-wide. Many of our members live in proximity to the area near Sand Creek which is being petitioned to the Environmental Quality Council (EQC) to be designated Very Rare and Uncommon. The petition is being brought by Biodiversity Conservation Alliance (BCA). Wyoming Farm Bureau does not support this petition. The petition should not be considered by the EQC for many reasons.

Several assertions made by BCA are incorrect. For example, on page 7 BCA asserts that those holding grazing leases do not hold property rights. Grazing leases, whether private or public land, can be bought, sold, and used as collateral when borrowing funds. I ask the EQC's Attorney General the question if indeed leases are considered property.

On pages 17-18, the petition lists scenic values purports that the values exist only on the lands being proposed for very rare and uncommon status. This is once again either a fabrication or stretching the truth. While the views in the petitioned area are spectacular, they exist in many areas of Wyoming. Many of the same type of views in the Sand Creek area exist on private lands in Crook and Weston Counties. While the views will not be exactly the same, the views in other areas are extremely similar, and are on private lands.

On page 35, Attachment 1, BCA claims that ponderosa pine- bur oak is a type of rare vegetation association. This is either a fabrication or at least a strong stretching of the actual situation. From personal observation, several 1,000's of acres of this type of vegetation association. If one would observe the vegetation along Wyoming State Highway 24 from Devils Tower Junction through Hulett, Alva, and Aladdin to the Wyoming-South Dakota, several 1,000's of acres of this association would be evident. Other roads where this type of plant association can be observed include the Mona Road, Oak Creek Road, Hay Creek Road, which are county roads. Several 1,000's of acres of this type of plant association also exists in South Dakota and Montana. A similar type of plant association also exists in Carbon County, WY, (bur oak and lodge pole pine). If this many instances occur of this or a very similar plant association exists in Wyoming and surrounding state, it cannot be termed "rare". If this assertion can be so easily discounted, concerns should exist regarding all assertions made by BCA.

On pages 18-22, the petition outlines current and historical land uses of the area. The information given by BCA is inadequate at best. No numbers or level of use by various industries are shown. Given that this is all land managed by a federal agency, the U.S. Forest Service, numbers are available for several uses including grazing, timber harvest, and recreation. These numbers must be included.

This petition should not be considered by the EQC. BCA has not adequately provided information that should be included or have included information that is misleading.

FILED
JUL 08 2010
Jim Ruby, Executive Secretary
Environmental Quality Council