

Wyoming Environmental Quality Council
Herschler Building, Room 1714
122 West 25th Street
Cheyenne, Wyoming 82002

October 25, 2010

re: Sand Creek Very Rare or Uncommon Petition

I am writing to ask the EQC to grant Very Rare or Uncommon status for the Sand Creek area. This feels risky. Whenever I've asked the Council to take certain actions in the past, it has always ended up doing the opposite. But this is a special place, and it is too important not to speak out.

I have spent quite a bit of time in the Black Hills and many of the other National Forests around the country. The Black Hills is probably the most heavily impacted National Forest in the USA. Over 8,000 miles of roads now crisscross those public lands. Most were created for logging. Nearly every forested acre has been logged at least once and the majority of stands have been logged multiple times. As a result, there is virtually no old growth habitat left. Nor are there any areas remaining that offer truly "primitive" or natural qualities. The one – and I emphasize, one – exception is the Sand Creek area you are now considering for VRU. It is still roadless. I believe it is the very last roadless area of any size in the Black Hills. The Black Elk Wilderness has a wide, road-like trail running through it, along with a large CCC building right in its core, so even that small and isolated "wilderness" is more developed than Sand Creek. The area you are considering may also have the highest proportion of fire-resistant old growth trees left in the entire Forest. On top of all this, it has a pristine stream (home to the very rare finescale dace) and unique plant communities.

VRU status should be granted for all these reasons. Sand Creek is not just special because of what it contains, but also because of how much damage has been done to the rest of the Black Hills.

You will no doubt be getting many comments from industry reps telling you it would be a bad idea to grant VRU status for Sand Creek. But the reality is the timber, livestock and mining industries – as well as ATV users – have about 98% of the rest of the Black Hills to use for their own profit or personal interests. It is not going to hurt any industries, local economies or private citizens to simply designate this place VRU and formally recognize the rare and unique values it possesses.

In addition, the Forest Service has designated this part of the Sand Creek area for low-intensity management, and largely to protect the unique qualities I listed previously. The VRU status would compliment this management emphasis, whereas denying VRU would work against it.

Thank you for considering these comments. Please do the right thing on this. Sand Creek is a very special place and deserves this important recognition from the State of Wyoming.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D.J. Duerr', with a horizontal line extending to the right.

D.J. Duerr
P.O. Box 1668
Pinedale, Wyoming 82941