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**Jim Ruby, Executive Secretary
Environmental Quality Council**

August 22, 2008

TO: Wyoming Environmental Quality Council

FROM:  Gene Gade – Senior University of Wyoming Extension Educator – Northeast Area

RE: Petition for Designation of a Sand Creek “Rare and Uncommon Area”

I wish to comment specifically on the petition that is proposing to designate an area of the Sand Creek watershed in Crook County Wyoming as “Rare and Uncommon” Area. However, I first want to state more general positions related to issues of this type and a bit about my credentials.

I have three university degrees, all of which emphasized botany and the two graduate programs emphasized ecology and its application in natural resource management, especially in rangelands. I am very interested in and respectful of biodiversity, the development, history and geographic distribution of plant species and ecosystems, the existence of relic areas and “refugia.” I believe in science-based land-use planning, including the need for restriction of some human activities on truly sensitive areas. I also believe that livestock grazing is a legitimate use of many public lands that is sustainable ecologically and economically...if it is well managed. Reasonable regulation is often desirable, but redundant regulation is unnecessary and burdensome. I do not believe that these positions are contradictory or incompatible.

Now, specifically with regard to the Sand Creek area: The US Forest Service has spent many years and dollars creating and implementing a Forest Plan for Black Hills National Forest. A great deal of technical expertise has been applied in this process, including a very good inventory of ecological types and sensitive areas. The public and many stakeholder groups have also had abundant opportunity for input. The understanding and acknowledgement of the Sand Creek drainage as an “Ice Age Refuge” with numerous rare plant species and important wildlife, watershed, archaeological and scenic values is important. I am strongly supportive of the protection given to the Dugout and Upper Sand Creek (Spotted Tail) areas (over 2,000 acres) along with the six other “Botanical Areas” under the Forest Plan. I also share the concern of many people that mining in the Sand Creek area would almost certainly have major and unacceptable environmental consequences in that sensitive area. However, outside of the Botanical Areas, well-managed grazing and logging should not threaten the biodiversity, watershed, wildlife habitat, scenery or other values.

Therefore, in my opinion, the proposed “rare and uncommon” designation is an unnecessary duplication of restrictions that are already in place under the Forest Plan. Redundancy of this type will increase the cost of bureaucracy and it will increase the costs and efforts of those who are trying to manage legitimate economic activities (grazing permits) that have long been recognized among the “multiple uses” of public lands. Livestock grazing has been practiced in the area for over a century, with little undesirable impact. I favor restrictions on mining in the area, but I believe it will be a mistake if the Wyoming Environmental Quality Council applies another layer of restrictions to this already protected area. Therefore, I urge you **not** to take favorable action on the petition.