

BOARD OF COUNTY COMMISSIONERS

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PARK COUNTY, WYOMING
ORGANIZED 1911

ORIGINAL PARK COUNTY COURTHOUSE
CODY, WYOMING
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November 5, 2008

County of Park

Commissioners Office

Environmental Quality Council
122 West 25th St., Herschler Bldg.
Cheyenne, WY 82002

RE: Comments on the Proposed Agricultural Use Protection Policy Revisions of Chapter 1, Water Quality Rules and Regulations

Dear Council Members,

The Park County Commissioners want to go on record supporting Chapter 1 of the Agricultural Use Protection Policy as recommended by the Water and Waste Advisory Board on March 28, 2008 and that the Environmental Quality Council adopt the WWAB recommendations with non-severability of the rules.

The reasons we support the WWAB recommendations are:

- 1) 97% of total private land in Park County is in agricultural use
- 2) Agriculture is economically important to Park County; In 2002, the gross agricultural receipts totaled \$72.4 million; directly supported 815 jobs & generated \$10.3 million in labor earnings
- 3) Livestock production on ranches is a major component of agriculture in Park County; and 60% of the income from agriculture marketing is from livestock production

(This data is from UW's Economic Analysis for Park County – 8/5/2005)

The agricultural industry has lost some productive cropland due to development but mostly to drought. Ranchers are unable to raise the same number of cattle due to drought conditions. A year ago, both the Larsen Ranch and the Renner Ranch at Meeteetse used the discharge water from oil wells as that was the only water available for their cattle.

The discharge water from these wells is crucial for livestock and crop production. Common sense tells us that farmers and ranchers would not jeopardize their livestock or crop production by using water that would have an adverse affect.

EQC Comments

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Park County Commissioners recommend that specific problems related to CBM development should not be allowed to impact the entire State of Wyoming and that CBM water discharge problems be addressed separately.

4) Economic impact to Park County

In 2004, the assessed valuation for Park County was \$445 million; the largest source of assessed valuation was minerals; which was 51%.

(UW's Economic Analysis for Park County – 8/2005; Local Govt. Revenue)

If the oil wells are forced to stop production in order to comply with discharge water standards, Park County will lose millions of dollars in assessed valuation. This is our largest source of revenue to operate our County and would be a major impact to Park County.

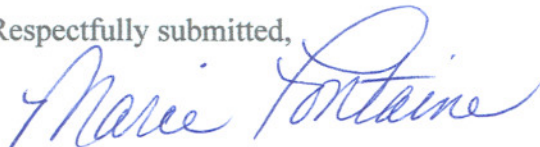
It is our understanding that the State Environmental Quality Act requires a balance analysis; (net environmental benefit versus social, economic & cultural) As you can tell, with more stringent requirements, Park County's tax base will be immensely affected with a decline in oil & gas production as well as agricultural production.

Lastly, Dr. Raisbeck's recommended limits for water quality is zero risk which does not represent Wyoming's open range conditions. Penny Hunter's risk analysis study shows the current limits protective & not harmful to livestock and crops.

Again, Park County supports Chapter 1 of the Agricultural Use Protection Policy as recommended by the Water and Waste Advisory Board on March 28, 2008. We hope you can understand the serious ramifications that will occur economically to ranchers, farmers and to Park County.

Thank you for holding this public meeting in the Big Horn Basin.

Respectfully submitted,



Marie Fontaine, Park County Commissioner
On behalf of the Board of Park County Commissioners

Attachments: 2

this land is privately owned. This means that 97 percent of the total private land in Park County is in agricultural use. Because of its dominance, what happens to agriculture in the county has important implications for private land use in Park County, particularly in terms of maintaining open space, preserving wildlife habitat on private lands, and the cost providing local government services.

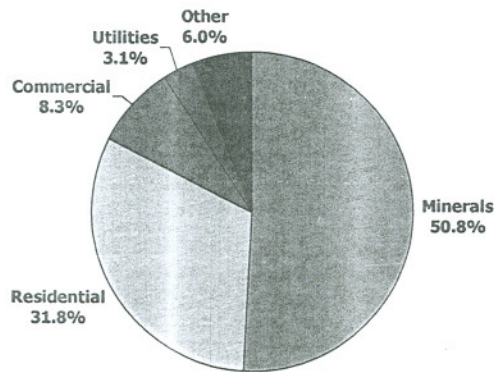
Agriculture is also economically important to Park County. In 2002, gross agricultural receipts for the county totaled \$72.4 million, down from \$74.9 million in 2001 (U.S. Department of Commerce, 2004). Agricultural production directly supported 815 jobs in the county and generated \$10.3 million in labor earnings in 2002. The average earnings per job for agricultural proprietors in the county for 2002 were \$9,673. For hired agricultural labor the average earnings per job were \$29,088. The earnings per job for proprietors were substantially lower because many proprietors are only involved in agricultural production on a part-time basis, earning the majority of their income from other sources.

Livestock production, especially ranching, is a major component of agriculture in Park County. The Department of Revenue's Annual Report indicates that 83 percent of the agricultural land in Park County is classified as rangeland (563,414 acres). This implies that more than 80 percent of the total private land in Park County is used for ranching. From an economic perspective, 60 percent of the cash receipts from agriculture marketing are from livestock production (U.S. Department of Commerce). The Census of Agriculture estimates that there were 221 agricultural operations with beef cows and 60 agricultural operations raising sheep in Park County in 2002. Most of the livestock production in Park County occurs on fairly large operations. Nearly three-fourths of the cattle were on ranches with 200 head or more of cows. The average size for these 200 plus cow ranches was 570 head. Over 80 percent of the sheep were located on ranches with 1,000 or more sheep and lambs. The average size for these 1,000 plus sheep ranches was 2,280 head.

Because the federal government manages nearly 80 percent of the land area in Park County, management decisions made by federal land management agencies can have important implications for Park County. As an example, 82 percent of the agricultural land in Park County is controlled by an agricultural operation holding a grazing permit (1997 Census of Agriculture). Three-fourths of these permits are for either Forest Service or BLM grazing. Because these federal grazing permits are generally part of a ranch's overall grazing system involving other sources of forage including state and private land, a change in federal grazing can affect the operation of the entire ranching enterprise. As a result what happens to federal grazing can have important implications for private agricultural land and private land use in Park County.

The loss of ranchland is a concern in Park County. Census data indicates that more than 60 percent of the county's population growth between 1990 and 2000 occurred in rural areas. In addition, the number of second homes in the county (which are not counted in the population numbers) increased by more than one-third. Much of this second home growth has likely occurred in rural areas of the county. In response to this growth, the

Assessed Valuation in Park County, 2004



Summary

- In 2004 the assessed valuation for Park County was \$445.0 million.
- The largest source of assessed valuation for the County was Minerals (51%).
- Following Minerals was Residential (32%).
- These two sectors represent more than 80 percent of the County's tax base.