

Comments to the Environmental Quality Council
Regarding Surface Water Quality Standards

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I'm Len Cannella, a landowner on Cottonwood Creek between Hwy 20 and Hwy 120. We utilize surface discharge waters for irrigation during the growing season and year round for livestock watering. This water is also used by and provides habitat for deer, sandhill cranes and numerous other species of waterfowl, small animals and birds. If new standards are applied and this water source is diminished or goes away entirely you will put us and many other tributary landowners out of business as well as severely limiting wildlife. I therefore wish to encourage the EQC to take the following actions in regard to surface waters within the State of Wyoming being used for agricultural purposes.

1. Retain the existing livestock standards. These have been in place since at least the 1970's without complaint or instances of harm. In fact, many producers rely upon the discharged water for both livestock watering and irrigation of hay and pasture land. Furthermore, there has certainly been no "measureable decrease in crop or livestock production"
2. Keep the rules non-severable and retain the grandfathering provision. This process has taken several years and gone through numerous revisions. Any further changes only serve to decrease the flexibility landowners and operators need in managing this water for beneficial purposes. Many properties have been developed and improved based upon the availability of the discharged water. To change the existing standards would render all current business plans obsolete.
3. Respect private property rights. One of the great privileges of living in a democratic republic is that of private property rights. These rights should not be infringed upon.
4. Economic concerns. It is my belief that to change the existing standards would do enormous and irreparable harm to the economy of the Big Horn Basin. Great quantities of water which are now being used in a beneficial manner for crops, livestock watering, local flora and wildlife would no longer be available. Numerous homes, farms and ranches would suffer significant decreases in values as well as reduction in goods and services produced. The oil and gas industry would curtail production resulting in less employment opportunities. Both of these situations would in turn drastically reduce the tax revenues collected.
5. Lastly, I would remind you that according to WYO. STAT. 35-11-302, the EQA requires balance between environmental protection and socio economic concerns. I do not feel that equal weight has been given to the socio economic concerns and I am also convinced that you would see a devastating impact to the environment as it relates to the number of plants and wildlife that this discharged water provides for.

Thank you for your time and consideration.

Len Cannella