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April 11, 2018

Ronald Steg
Wyoming Department of Environmental Quality
510 Meadowview Drive
Lander, WY 82520

Re: Wyoming's Draft 2016/2018 Integrated 305(b) and 303(d) Report

Dear Mr. Steg:

The Campbell County Conservation District (CCCD) would like to submit the following comments in response to Wyoming's Draft 2016/2018 Integrated 305(b) and 303(d) Report (IR). Our comments are specific to our mission: To provide leadership for the conservation of Campbell County's soils and water, protect the agricultural resource base, promote the control of soil erosion, promote and protect the quality and quantity of Campbell County's water and all other natural resources, preserve and enhance wildlife habitat, protect the tax base and promote the health, safety and general welfare of the county through responsible conservation ethic. Thus our comments will be limited to the streams within Campbell County.

Since 2002 the CCCD has taken a leadership role in water quality assessment, planning and implementation within Campbell County. Specifically CCCD has worked to address waterbodies that are listed on the state's section 303(d) list of impaired waterways. This includes Little Powder River, Donkey Creek, Stonepile Creek and Middle Prong of Wild Horse Creek¹. This draft IR contains several inconsistencies in tables and narratives leading to confusion of the direction that will be undertaken by Wyoming Department of Environmental Quality (WDEQ) and its partners. The Draft IR lacks information on the designated use changes approved by the Environmental Protection Agency in 2017 through the Use Attainability Analysis. That decision will have bearing on the future listing of some of the streams listed in the document and acknowledgment of those proposed changes should be mentioned either in the introduction, or

¹ Wyoming Department of Environmental Quality. *Wyoming Water Quality Assessment and Impaired Waters List*. Cheyenne: WDEQ, 2012.

in the information about the streams that the changes would apply to. Please see specific comments below:

1. Pg. 3, 2.2 Designated Uses and Classifications
 - The CCCD suggests that this would be an appropriate location for further discussion on the Environmental Protection Agency's 2017 approval of changes to Wyoming's designated uses, through the Use Attainability Analysis. This would aid in supporting sections including the Water Quality Prioritization Framework and Wyoming's 2022 Vision.

2. Pg. 12, Table 4.1 Wyoming's 2022 Vision Priorities.
 - Assessment unit ID WYBF101202010504_00 is duplicated in the table two times.
 - Assessment unit ID WYBF101202010601_01 is duplicated in the table three times.
 - There is only one cause of impairment (Phosphate) listed for the Gillette Fishing Lake. Gillette Fishing Lake is listed for total phosphorus and sediment and the TMDL in place covers both impairments². Adjustments should be made to the table to reflect phosphorus and both causes of impairment.

3. Pg. 14, Table 4.1 Wyoming's 2022 Vision Priorities.
 - Assessment unit ID PR100902080500_01 Little Powder River is listed as having a TMDL ready in 2019. It is the CCCD understanding that a TMDL Alternative, Watershed Based Plan, was being developed for the Little Powder River. Corrections should be made to the TMDL status, and consistency with other tables on the target date of completion should also be made.

4. Pg. 16, 5.0 Wyoming's Non-point Source Program, first paragraph last line.
 - Consider adding wildlife to the list of bacteria and nutrient sources.

5. Pg. 17, Climate Change, paragraph 2
 - "Aging forests, prolonged drought and warmer winters have allowed populations of pine beetle in Wyoming to reach epidemic status."
 - ◊ WDEQ should consider updating this statement to reflect the current situation with respect to pine beetle in Wyoming. Consider, "In recent years Wyoming's forests have experienced increased mortality due to epidemic levels of Mountain pine beetles. This can be attributed to overstock conditions, drought, and other climactic factors which have resulted in weak and stressed forest stands. Currently the level of Mountain pine beetles have decreased back to endemic populations."
 - "USFS estimates that 3.3 million acres of national forest have been infested by pine beetle in Wyoming since the 1990's."

² HDR. *Gillette Fishing Lake TMDL for sediment and Total Phosphorus*. Cheyenne: WDEQ, 2013.

- ◇ This number is not accurate and should be updated. According to the Wyoming State Forestry Division, 3,480,000 acres of Wyoming's forests were affected by Mountain pine beetle from 1996-2017³.
- "Rapid deforestation may result in elevated water yield (Potts 1985, CCSP, 2009) and soil erosion (CCSP, 2009) in effected watersheds..."
 - ◇ CCCD recommends improvements to this paragraph. While deforestation can result in increased erosion potential it is not directly connected to pine beetle mortality. Pine beetle mortality leaves standing dead trees with intact root systems. After a period of time the trees will fall which can assist in soil stabilization of these sights. WDEQ should, at a minimum, clearly separate pine beetle and deforestation from one another.

6. Pg. 23, 8.2 Belle Fourche River Basin

- In the first paragraph of this section the sources of discharge which result in the perennial flows in Donkey Creek are listed. CBM production is listed as one of the major contributors. The CCCD suggest that this be further explained. As with the Powder River Basin, the Belle Fourche River Basin has experienced a decrease in the number of WYPDES permits for CBM, which likely has an effect on the overall contributions from CBM. The CCCD encourages WDEQ to discuss this as they did in section 8.10 of the document.

7. Pg. 24, Donkey Creek (WYBF101202010600 01) and Stonepile Creek (WYBF101202010602 01), Class 3B, second paragraph

- The IR states that CCCD developed a watershed plan for Donkey Creek and Stonepile Creek in 2006. This is correct, however in 2017 the CCCD and the Donkey Creek Watershed Steering Committee updated the document. See link: http://192.168.1.1:8181/http://www.cccdwy.net/uploads/2/5/8/1/25810027/approved_dc_watershed_plan_2016.pdf. Please update this information.
- In the second sentence of paragraph two it states that the implementation strategies identified in the Donkey Creek Watershed Plan were developed by CCCD alone. This was done by the Donkey Creek Watershed Steering Committee and should be revised.
- The last sentence of the paragraph states that the high chloride numbers source, "...may be the City of Gillette WWTP..." according to a report generated by the CCCD. In the "Powder River and Belle Fourche River Watersheds Monitoring Project: Data Analysis Report" it does not directly state that the cause of the elevated chloride to be solely a result of the City of Gillette WWTP. However, it does state that sources could be, "...wastewater treatment plants using chlorination, oil and gas discharges, and deicing agents used on roads."⁴

³ Wyoming State Forestry Division. "MPB Damage Recorded by Aerial Survey". 4/6/18, <<https://sites.google.com/a/wyo.gov/forestry/forest-management/forest-health/highlights>>.

⁴ Campbell County Conservation District. *Powder River and Belle Fourche River Watershed Monitoring Project: Data Analysis Report*. Gillette: CCCD, May 2014.

Furthermore these potential sources of chloride are highlighted in the Belle Fourche River Watershed TMDLs. The TMDL document also states that, “The elevated chloride loads from Stonepile Creek are the major source of chloride load to Donkey Creek.⁵”

8. Pg. 111, Middle Prong Wild Horse Creek (WY100902020808 01), Class 3B
 - After the approval of the of designated use changes approved by the Environmental Protection Agency in 2017 through the Use Attainability Analysis this stream should have been re-categorized as a secondary recreational use stream. There is no discussion about this occurring, or the future of this occurring. The CCCD encourages WDEQ to consider adding additional language to this section in order to clarify this topic.

9. Pg. 209, Powder River Basin – 2016/2018 303(d) List
 - This table needs clarification as far as how it relates to other tables. In Table 4.1 there is information on “Wyoming’s 2022 Vision Priorities” in regards to TMDLs that will be completed by 2022. In the text prior to the table it states that low priority TMDLs were not brought forward into the vision priorities. This causes confusion because Middle Prong of Wild Horse Creek has a 2022 TMDL date on page 209, but there is no mention of the creek in Table 4.1. The reader is left to assume that it is a low priority TMDL and thus not included in Table 4.1. In order to clarify this WDEQ should add an additional column in the 2016/2018 303(d) List table that would include additional information for the prioritization of TMDLs (i.e. Low Priority TMDL, Site-Specific Criteria Recommended, Designated Use Change Recommended, and High Priority TMDL).

10. Finally there are inconsistencies in a number of tables in the document. Specific to the Little Powder River, the document states two different dates for document completion (i.e. 2019 and 2022), and three different types of documents (i.e. TMDL, TMDL alternative, and Watershed Based Plan). The CCCD encourages WDEQ to revise the draft to include consistent language to ensure transparency on the requirements/ expectations for what is to be completed in the Little Powder River. It is the CCCD’s understanding that the Little Powder River Watershed Steering Committee will be completing a watershed based plan. This plan is to be completed by the end of CCCD’s current 319 grant “Little Powder and Belle Fourche Watershed Implementation Project Phase II” in 2020. CCCD requests that WDEQ update the following tables to reflect this information:
 - Pg. 12, Table 4.1 Wyoming’s 2022 Vision Priorities.
 - Pg. 164, Table 10.3 Active TMDL/ Alternative Projects
 - Pg. 210, Powder River Basin- 2016/2018 303(d) List

⁵ Tetra Tech, Inc. Belle Fourche River Watershed TMDLs for Pathogens, ammonia, and Chloride. Cheyenne: WDEQ, August 2013.

The CCCD appreciates the opportunity to comment and we look forward to working with you in the future.

Sincerely,



BJ Clark
Chairman, Campbell County Conservation District

Cc: Wyoming Association of Conservation Districts
Campbell County Commissioners
City of Gillette