



Wyoming Association of Conservation Districts
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May 8, 2018

via: <http://wq.wyomingdeq.commentinput.com/>

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

RE: Draft Comments on 2016-18 Integrated Report

Dear Ron,

Thank you for the opportunity to provide comment and feedback on the above referenced draft report. We appreciate our partnership with DEQ and the work the agency puts into the assessment report and listing process.

The Association recognizes that staff changes occurred at the Department and as a result anticipate several of our comments may not reflect that transition. There are several areas of the narrative that are very outdated. WACD would like to work with DEQ to increase the amount of data and information submitted by Conservation Districts when DEQ issues the notice and request. We anticipate that additional outreach with districts would help ensure the information contained in the report is as current and relevant.

General Comments

Category 4(c) – WACD appreciates the modification and re-categorization of waters that have legally protected and appropriated water rights affiliated with them. Re-designating these waters to Category 2 is a much more appropriate. We look forward to continuing to work with DEQ on a modified designated use support process to reflect the conditions and uses appropriately after consideration of water rights.

Page 3 – Historic Data. WACD appreciates the addition of the section on Historic Data.

Page 8 WACD references – Section 3.2 and throughout the document DEQ provides reference to WACD's Watershed Progress Report. We appreciate the Department's recognition of the report and the

information contained therein, however the version cited is the 2011 publication. There was an updated Watersheds Progress report published in 2015. The report can be found here http://www.conservewy.com/docs/15_watershedrpt.pdf. Each of the reports builds upon the previously published report. The report serves as a synopsis of on the ground work being implemented to address impairments and threats as well as a summary of data. The Association suggests that it may be beneficial to reference these reports and provide a link to our website along with a statement indicating that for additional information on implementation and monitoring activities to visit the website. That may be a more efficient method for providing this information versus DEQ pulling pieces from various reports and maintain current status.

WACD is currently in the process of compiling and creating a story map version of the 2018 Watersheds Progress Report and will be sending DEQ the final report and link when completed. The report will be available via our website as well.

Pages 13-15 – Table 4.1. Wyoming’s 2022 Vision Priorities

Laramie River & Little Laramie River – WACD request clarification on status of delay on this TMDL as we were under the impression it was in progress.

Little Powder River – WACD is unclear on the designation of “TMDL Ready” when the steering committee has initiated planning for “TMDL Alternative” and both Pages 164 and 210 indicate it as a Watershed Based planning effort or TMDL Alternative. Please clarify the status.

Prairie Dog Creek and tributaries – Again, the TMDL Status is listed as “TMDL Ready” however our understanding is this TMDL been completed.

Page 16 – 5.0 Wyoming’s Nonpoint Source Program

“Common nonpoint source contaminants include...and bacteria and nutrients from livestock and pet waste or failing septic systems.” Please add wildlife to the list of possible bacteria and nutrient sources.

Page 17 – Climate change and Forest Health – WACD incorporates by reference those comments submitted by the Campbell County CD. The district is very involved along with the Crook and Weston districts in Forest Health management and Forest health policy matters at the local, state, and national levels. Based on the information the district provided, WACD suggest this section be updated.

Specific Comments

Page 21 – Smiths Fork – The Lincoln Conservation District submitted information on implementation activities occurring in this area. There is a newer allotment management plan and the District, Game & Fish, grazing permittees and others have been conducting annual willow re-establishment planting efforts for past 3 years. The narrative for the Smiths Fork is over (X) years old and does not reflect current conditions and activities. We suggest removing this narrative. WACD would be happy to work with the local district and others in providing more current information for the next IR.

Page 34 Twin Creek – Emailed Kelsey for additional info on stream bank stabilization project

Page 46 – Just for DEQ’s information, WACD is working with the SBHCD to complete additional analysis of data and update SAP and review qa/qc.

Page 51 – There is a repetitive sentence in the narrative on Bitter Creek.

Page 61 - LaBarge Creek – WACD suggest the last sentence of this paragraph be removed from the narrative. This would be consistent with the Department’s decision to recognize legally protected water rights and the Environmental Quality Act’s limitation with interference of those rights.

Page 66 – Big Sandy River – The last sentence in this section indicates that the Little Sandy River Watershed Based plan was completed in 2017. The Little Sandy River Watershed Based plan was completed in 2018 with a public comment period beginning May 8, 2018 for 45 days.

Page 69 – Bitter Creek and Killpecker Creek TMDL Development – There is no mention of the completion of the Bitter Creek and Killpecker Creek (Fecal coliform) TMDLs. The TMDLs were completed in 2017. Page 163 indicates it is “Pending submittal to EPA”.

Page 72 - Willow Creek – Indicated DEQ began monitoring in 2013 Willow creek to re-assess designated use support. WACD would like to discuss the status of that monitoring and lend any assistance to DEQ that may help complete this assessment.

Page 100 – WACD incorporates by reference the comments submitted by Laramie Rivers Conservation District.

Page 111-112 – WACD incorporates by reference the comments submitted by the Campbell County Conservation District.

Page 114 Murphy Creek – WACD understands a field tour was held with DEQ, EPA and the District in the summer of 2017. WACD further in discussions with the district understands no decision has been rendered on the site specific criteria. WACD is requesting an update on the status of this petition.

Page 133 – Flat Creek – This narrative indicates in 2013 data was collected by DEQ in cooperation with DEQ but that the data has not been evaluated.

Page 134 – Stump Creek – This narrative may have an error in referencing “Autumn”. Believe this should be Auburn?

Page 143 – WACD suggest this narrative be updated with the status of the ongoing Tongue River TMDL.

Page 150 – WACD requests that the narrative be updated and reflect the completion of the Prairie Dog TMDL. This was completed in 2017 and as indicated on page 163 it is “Pending submittal to EPA”.

Page 155 – Bighorn – Yellowstone Survey – WACD requests further discussions on the results of the Departments data results pertaining to E. coli. The report indicates 70% of stream miles in the Bys had concentrations in the least disturbed condition exceeding the 126 colony forming units. This data may be important as additional work is done to attempt to restore water quality that is exceeding the criteria.

Page 165 - North Branch North Fork Crow Creek – The narrative indicates the Laramie Rivers Conservation District is monitoring this Creek; however Laramie Rivers indicated they are not. The Laramie County Conservation District had been monitoring the Creek; however they have opted to cease monitoring.

Page 167 – Waters moved from 303(d) list to Category 2(De-listings) – WACD supports this delisting based on the data results from the Natrona County Conservation District. This de-listing is a significant testament to the local work being done by the Conservation district, irrigation district, city and county. WACD appreciates the support and funding provided by DEQ to this project.

Page 169 – Waters Moved From Category 4C to Category 3; Soldier Creek – There appears to be an error in that the narrative is discussing Soldier Creek however Crooked Creek referred to as well.

Page 200 – Brooks Lake and Twin Creek should be moved to the next section “Big Horn River Basin - 2016/2018 303(d) List”.

Again, thank you for the opportunity to provide input. WACD looks forward to continuing work with DEQ on Wyoming’s Watershed health.

Sincerely,



Bobbie K. Frank
Executive Director

Cc: Wyoming’s Conservation Districts
WACD Board of Directors