



May 10, 2018

Wyoming Department of Environmental Quality
ATTN: Ron Steg, TMDL Coordinator
510 Meadowview Drive
Lander, WY 82520

RE: Draft Wyoming Department of Environmental Quality 2016-2018 Integrated 305(b)
and 303(d) Report

Dear Ron,

The Sublette County Conservation District (SCCD) has the authority to assist, promote, and protect public lands and natural resources, soil, water, and wildlife resources, to develop water and to prevent floods, to stabilize the ranching and agriculture industry, to protect the tax base, and to provide for the public safety, health, and welfare of the citizens within Sublette County, Wyoming. SCCD offers the following specific comments regarding the Draft Wyoming Department of Environmental Quality (WYDEQ) 2016-2018 Integrated 305(b) and 303(d) Report.

Reardon Draw has been listed on the Category 3 Surface Water table based upon an assessment conducted by the WYDEQ in 2006. Reardon Draw is listed as a Class 2AB stream. Reardon Draw is an ephemeral draw that experiences short bursts of runoff due to snow melt or storm events and does not maintain constant flow. The water flowing out of Reardon Draw hits an alluvial fan just before it confluences with the Green river. This provides an opportunity for sediment to settle out of the water column and deposit onto the alluvial fan prior to the water entering the Green River (see map and photos).

SCCD received a 319 Grant from WYDEQ in the mid-1990s to reduce the sediment contribution from the Reardon Draw watershed. A metal drop structure was placed in Milleson Draw and a Manning Sampler was installed to collect sediment samples at predetermined intervals. Water quality data was collected during two storm events and SCCD submitted a final report to WYDEQ April 17, 2000.

The final report concluded the water quality from Milleson draw reflected a higher concentration of sodium ions when compared to data from the Green River collected at the USGS gaging station located near LaBarge, WY. The Green River showed a higher concentration of calcium and magnesium ions. Collected data shows that the total dissolved solids concentration in the Green River below both Reardon and Milleson Draw was 50% of the value recorded in Milleson Draw, showing that sediment has settled out before reaching the Green River. Upon receiving comments from WYDEQ,

SCCD submitted further information contained in a report entitled "Assessment of a section of the Green River from Sublette County Conservation District Surface Water Site GR21 located above the Confluence of Reardon and Milleson Draws Downstream to Sublette County Conservation District Surface Water Site GR23". SCCD requested that WYDEQ remove Reardon Draw from the WYDEQ 303 (d) list. After this assessment WYDEQ did remove Reardon Draw from the 303(d) list. Based upon data the district submitted from two established sampling sites one above and one below the confluence of Reardon and Milleson Draws, the district suggested there was no water impairment due to runoff from either draw.

SCCD would request a meeting with WYDEQ to consider changing the designation of Reardon Draw from a Class 2AB stream to a 4B designation. This suggestion is based upon the evidence that flow into Reardon Draw is ephemeral and the source is from occasional snow melt and/or storm events. The district would like to ensure Reardon Draw has the appropriate designation going forward.

There are two other creeks that SCCD has comments on in relation to the Upper Green Watershed. These include Rock Creek and LaBarge Creek. SCCD has partnered on several projects within the Rock Creek and LaBarge Creek watersheds. These projects have been on both private and federal lands working with landowners and land managers to improve water quality and riparian and upland vegetation health. The District would like to request a meeting with WYDEQ to determine what information is needed to address the designated uses for both LaBarge Creek and Rock Creek. Insufficient or inconclusive data or information is lacking to determine if these current designated uses are supported. In addition, SCCD suggests the last sentence of the paragraph on page 61, regarding LaBarge Creek, 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.

SCCD has also issued the Little Sandy Watershed Plan for a 45 day public comment period, which ends on June 22, 2018. The plan will hopefully lead to some great projects on the Little Sandy eventually leading to that reach being removed from the 303(d) list as well.

SCCD appreciates the opportunity to comment, and looks forward to working with WYDEQ on the waterbodies within Sublette County and assisting in the acquisition of needed information to have them properly classified. If you have any questions feel free to contact me at any time.

Sincerely,



Michael Henn
District Manager

Cc Wyoming Association of Conservation Districts
Wyoming Department of Agriculture