



**Teton  
Conservation  
District  
Est. 1946**

RE: Comments on the DRAFT 2020 Integrated 303(d) and 305(b) Report

January 28<sup>th</sup>, 2020

Dear Mr. Steg and the Wyoming Department of Environmental Quality Watershed Protection Program,

Thank you for undertaking the monitoring effort to categorize *E. coli* concentrations in Fish Creek, Flat Creek, and the Snake River. Teton Conservation District (TCD) is particularly interested in supporting the forthcoming University of Wyoming microbial source tracking study in order to guide implementation of best practices. In general, TCD would like to compliment the new format of the Integrated Report. It is well constructed, and facilitates the connection between the listings, relevant narratives, and underlying data.

TCD's purpose of this letter does not pertain to the text currently included in the Draft 2020 Integrated Report. Instead, TCD would like to encourage the inclusion of additional language about Wyoming Department of Environmental Quality's (WDEQ) ongoing analysis of potential degradation in Fish Creek due to nutrient enrichment. The 2016/2018 Integrated Report clearly outlined the process that was underway to complete that assessment. TCD asks that the Draft 2020 Integrated Report build upon the previous report by identifying WDEQ's current plan to assess nutrient enrichment and the existing data.

The background for our comment is that TCD made substantial effort to complete nutrient enrichment data collection alongside the U.S. Geological Service. Three reports were subsequently published characterizing Fish Creek's hydrology, chemical makeup, and biological communities. Because this data collection did not meet WDEQ's Quality Assurance/Quality Control guidance, we partnered with WDEQ through the 205j Grant Program and worked in collaboration with WDEQ staff and a stakeholder group to develop a Sampling and Analysis Plan and begin sampling. This jointly-orchestrated and jointly-funded endeavor produced a dataset that was analyzed by Richard Thorp. He went as far as to create a draft final report prior to his departure from your department.

After Mr. Thorp's departure, Lanny Goyn was tasked with finalizing the report. It is TCD's understanding that Mr. Goyn felt that the existing data could not be used for its intended purpose due to fundamentally differing views regarding the study design. TCD then worked with Mr. Goyn to develop a new Sampling and Analysis Plan, and collected additional years of data. TCD had assumed that a final report would have been completed at this point in time, considering that the final pieces of data were submitted to WDEQ roughly one year ago.

Being that we have not heard otherwise, can TCD assume that Fish Creek nutrient enrichment data analysis and reporting are underway? Inclusion of this project within the Draft 2020 Integrated Report would help memorialize this status. Given the scale of this undertaking and its associated complexities, and the large dedication of resources TCD believes doing so would be appropriate. If the lack of inclusion of this project indicates that WDEQ does not plan on completing this analysis, communication in writing as to why would be beneficial to TCD and its numerous partners on this project.

Thank you for the opportunity to provide comment on the Draft 2020 Integrated Report.

*Teton Conservation District is a local government entity whose mission is to work with the community in the conservation of natural resources for the health and benefit of people and the environment.*



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Sincerely,

A handwritten signature in blue ink that reads "Carlin Girard".

Carlin Girard  
Water Resources Specialist and Associate Director

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