



February 20, 2020

Wyoming Department of Environmental Quality
200 West 17th Street
Cheyenne, WY 82002
Re: Draft Wyoming 2020 Integrated 305(b) and 303(d) Report

To Whom it May Concern:

Sublette County Conservation District (SCCD) has the following comments regarding the Wyoming Department of Environmental Quality (WDEQ) Draft Wyoming 2020 Integrated 305(b) and 303(d) Report. SCCD has the mandate 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 general comments as well as supporting rationale regarding the plan.

- 1. SCCD requests that the Use Support Decision Fact Sheet for Little Sandy River (linked on page 54, Table 13) include a link to the Little Sandy Watershed Plan.**

Rationale: The Little Sandy Watershed Plan was developed by SCCD and the Little Sandy Watershed Steering Committee. It provides the most up-to-date information of the state of the Little Sandy Watershed and includes valuable information for stakeholders and land managers. Because it is an impaired water and the watershed plan was developed as part of the TMDL process, it should be easily accessible to the public, and linking the information in the fact sheet would make it easily accessible.

- 2. SCCD requests that the proposed impaired segment of Lander Creek in Sublette County be added to the watershed map of the North Platte River Basin (page 65 of the integrated report).**

Rationale: This segment is proposed for listing in the 2020 draft report but is not visible on the watershed map. Adding it to the map will make it easier for resource managers and the public to see the location of the proposed stream impairment.

- 3. SCCD requests that WDEQ exclude the headwaters of Lander Creek from the segment of Lander Creek that is listed as impaired.**

Rationale: Based on the GIS shapefiles provided by WDEQ, the headwaters of Lander Creek are designated for secondary recreational contact and should not be included in the proposed impairment. The model designates primary recreational contact at the confluence of Lander Creek and an unnamed tributary upstream from Ord Creek. The waters upstream of this unnamed tributary should be excluded from the impairment because they are listed as secondary recreational contact waters, and the samples analyzed by WDEQ did not exceed the standards for secondary contact. This would reduce the length of the impaired section from approximately 6.3 miles to approximately 2.5 miles.

4. SCCD requests WDEQ re-evaluate the recreation designation for Lander Creek.

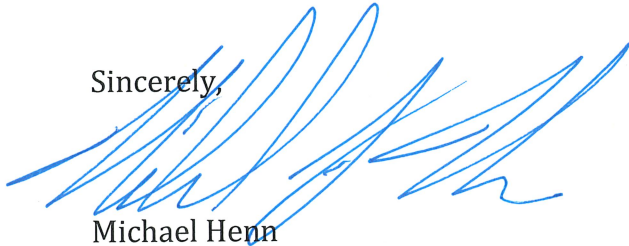
Rationale: The segment of Lander Creek that is proposed for listing due to *E. coli* impairment is a small headwater stream. Despite the small size of this stream, it is listed for primary recreational contact (full body immersion or equivalent). The WDEQ publication *Categorical Use Attainability Analysis for Recreation* states that "Wyoming has thousands of miles of ephemeral, small intermittent, and small perennial streams and ditches that do not have sufficient water to support full body immersion that are not used for child's play with a level of contact with the water equivalent to swimming during the summer recreation season." This description is accurate for Lander Creek. Based on local knowledge of Lander Creek, we do not believe it qualifies for primary recreational contact and should be classified as a secondary contact stream. Approximately 60% of the segment of Lander Creek that is proposed for impairment is already classified for secondary recreational contact based on the WDEQ GIS model. The flow is highly seasonal and does not permit full body immersion or equivalent activities. The geometric mean of the samples from Lander Creek was 318 cfu, which is above the primary contact threshold of 126 cfu but far below the secondary contact threshold of 630 cfu. Proper classification of this stream segment as a secondary recreational contact stream would prevent Lander Creek from being classified as impaired. SCCD requests a meeting with WDEQ staff to explore the options and requirements needed to reclassify this stream properly.

5. SCCD requests to be informed of all WDEQ management decisions regarding impaired waters in Sublette County.

Rationale: There are two stream segments in Sublette County that are listed as impaired in the 2020 draft report: Little Sandy River (previously listed) and Lander Creek (proposed in 2020 draft report). SCCD works with federal agencies, state agencies, local authorities, and private landowners to help monitor and manage water resources in Sublette County. We have relationships with the landowners and lessees in this region, and we believe it would be beneficial for SCCD to be involved in decisions about these streams related to monitoring, remediation, restoration, TMDL development, and other management activities.

SCCD appreciates WDEQ giving the opportunity to review the Draft Integrated Report. If you have any questions regarding our comments, feel free to contact Bradley Blackwell, Surface Water Program Manager, or myself at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael Henn', is written over the word 'Sincerely,'.

Michael Henn
District Manager

Cc Wyoming Association of Conservation Districts
Wyoming Department of Agriculture
Little Sandy Grazing Association
Sublette County Commissioners