



SHERIDAN COUNTY CONSERVATION DISTRICT

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Protecting Sheridan County's Water and Land Quality through Assistance Programs, Information and Outreach, Monitoring, and Planning

February 20, 2020

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

Re: Draft 2020 Integrated Report Comments

Dear Ron:

Thank you for the opportunity to review and provide input on the DRAFT 2020 Integrated Report Comments. As you know, the Sheridan County Conservation District (SCCD) has been monitoring multiple waterbodies for several years and will continue to provide monitoring information for use in report preparation.

General/Format:

Overall, the format and inclusion of the fact sheets and links to assessment records, TMDLs, and other supporting information is useful. At times, however, it is a bit cumbersome to navigate back and forth for multiple stream segments on the same waterbody. For future reports, it may be helpful to combine some of these in a way that makes sense.

The List of Completed TMDLs in Appendix B and the 303(d) List in Appendix D do not include any links to the TMDLs, Fact Sheets, or other sections of the report; that may be intentional as those links are available in other parts of the document. Again, it becomes a bit cumbersome to navigate back and forth to other sections for the appropriate links. Additionally, for ease of use in the tables, it might be helpful to include a title or reference to the appropriate TMDL. For example, the TMDL for McCormick Creek is part of the Goose Creek TMDL.

303(d) list:

The 303(d) list includes segments for waterbodies that have existing TMDLs on the same or adjacent segments for the same parameter, including, Little Goose Creek (WYTR100901010207_04 and WYTR100901010208_04) and Prairie Dog Creek (WYTR100901010401_02) segments listed for recreation in 2018. The Goose Creek TMDL, which was completed in 2010, included Little Goose Creek from the confluence past Big Horn (15.3 miles). It is unclear why the segment included in the current "List of TMDLs" table has been reduced to the 3.5 miles from the confluence to Brundage Lane and why the two new segments (which should have been included within the original 15.3 miles) are now listed on the 2018 303 (d) list.

The Prairie Dog Creek TMDL, which was approved in 2018, used load duration curves and reduction estimates prepared by SCCD for the Prairie Dog Creek Watershed Plan Update (2016). That plan and associated priorities included the full length of Prairie Dog Creek. Though the 2018 segment is, arguably, a separate segment, it seems redundant to initiate a duplicate effort when the characterizations and potential sources for those segments would be similar to the adjacent segments already included. Some thought should be given to developing a mechanism for incorporating segments, such as these, into existing TMDLs.

Susan Holmes
Chair

Edith Heyward
Vice-Chair

Orrin Connell
Secretary/Treasurer

Emerson Scott, III
Supervisor

Doug Masters
Supervisor

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Fact Sheets:

The fact sheets for the various segments were helpful. However, there were some inconsistencies and opportunities to improve their content. Understandably, it may not be possible to update all of these for this report, but it is something that should be considered moving forward.

- Some segments of Prairie Dog Creek are listed for Temperature based on data collected by SCCD. However, segments of other waterbodies with similar results (using the same methods) are identified as “Not Assessed”.
- For waters assessed by SCCD, there appears to be some inconsistencies in the Listing Dates, Assessment Cycles, and Rationale. While these inconsistencies may not change listing status, having consistent and updated information for them certainly demonstrates continued interest and effort by local entities (see attached table). Even if not possible to include links to all monitoring reports, an effort should be made to at least include the most recent, which would have the most current information (and include past results as well).
- For some parameters, like Manganese, previous reports described the potential source as due to natural factors. While this is mentioned in the Probability Survey Results of Appendix A, it would be helpful to include on the Fact Sheets also. Similarly, the Source Information, which is included on the 303(d)list table, would be useful.

Thanks again for the opportunity to provide input. This was a large undertaking and is a good first step to improving the overall format and utility of the Integrated Report.

Sincerely,

/s/

Carrie Rogaczewski
District Manager

Comments for Fact Sheet Assessed Cycles and Listing Rationale

Waterbody/Segment	Date Listed Recreation	Cycle Last Assessed	Listing Rationale	Comments
Columbus Creek WTR100901010106_01	2002	2001	SCCD 1996-1999 Assessment Report	SCCD submitted reports for 2003, 2006, 2010, 2013, and 2016 monitoring; 2013 report was referred to on other segments.
Smith Creek WYTR100901010106_02	2002	2001	SCCD 1996-1999 Assessment Report	SCCD submitted reports for 2003, 2006, 2010, 2013, and 2016 monitoring; 2013 report was referred to on other segments.
Five Mile Creek WYTR100901010108_01	2002	2001	SCCD 1996-1999 Assessment Report	SCCD submitted reports for 2003, 2006, 2010, 2013, and 2016 monitoring; 2013 report was referred to on other segments.
Little Tongue River WYTR100901010107_02	2002	2006	SCCD 1996-1999 Assessment Report	Reference is to the Assessment Report, the link is to the 2003 Monitoring Report, and the cycle last assessed is 2006. Another segment, which also has 2006 as cycle last assessed, is based on 2004 WDEQ data.
Wolf Creek WYTR100901010110_01	2002	2008	SCCD 1996-1999 Assessment Report	Reference is to the Assessment Report, the link is for the 2013 Monitoring Report, and the cycle last assessed is 2008.
Tongue River WYTR100901010108_02 (Wolf Ck to Smith Ck)	2018	2018	SCCD 2013 Report	
Tongue River WYTR100901010111_01 (Monarch to Wolf Creek)	2002	2009	SCCD 1996-1999 Assessment Report WDEQ 2003 data, where designated uses not assessed	From 1996-2006; SCCD's lowest sampling station was at the Town of Ranchester, which is approximately 4 miles upstream of Monarch road. Sampling below the Town of Ranchester to Monarch began in 2006.
Tongue River WYTR100901010111_02 (Goose Cr to Monarch)	2018	2018	SCCD 2013 Report	
Park Creek WYTR100901010204_01	2000	1999	Based on WDEQ data No assessment record available	SCCD submitted the 2001-2002 Assessment Report and subsequent interim monitoring reports for 2012 and 2015.
Rapid Creek WYTR100901010204_02	2000	1999	Based on WDEQ data No assessment record available	SCCD submitted the 2001-2002 Assessment Report and subsequent interim monitoring reports for 2005, 2009, 2012, 2015; some of which were included for other segments.
Beaver Creek WYTR100901010205_02				
Sackett Creek WYTR100901010207_01				
Jackson Creek WYTR100901010207_02				
Kruse Creek WYTR100901010208_03				
Soldier Creek WYTR100901010209_02				
Big Goose Creek WYTR100901010205_01	1996	2005		
McCormick Creek WYTR100901010208_02	2004	2003	SCCD 2001-2002 Assessment Report	SCCD submitted reports for 2005, 2009, 2012, and 2015 monitoring; some of which were included for other segments.

Little Goose Creek WYTR100901010207_03	2018	2018	SCCD 2015 Monitoring Report	
Little Goose Creek WYTR100901010208_04	2018	2018	SCCD 2012 Monitoring Report	
Prairie Dog Creek WYTR100901010401_02	2018	2018	SCCD 2014 Monitoring Report	Link is to the 2014 report, rationale also includes a reference to the 2011 monitoring and implies that the link includes a description of both periods; there was a separate report for 2011.
Prairie Dog Creek WYTR100901010400_01	2004	2010	WDEQ referenced for bacteria	The fact sheet also references Manganese and Temperature Impairments based on the SCCD 2007-2008 Assessment Report; does not reference SCCD Assessment or subsequent 2011, 2014, 2017 monitoring reports for bacteria
Meade Creek WYTR100901010401_01	2012	2010	SCCD 2007-2008 Assessment Report	SCCD submitted reports for 2011, 2014, and 2017, none of which were referenced
Wildcat Creek WYTR100901010402_02				
Dutch Creek WYTR100901010405_01				