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February 20, 2020

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

Re: Wyoming's 2020 Integrated 305(b) and 303(d) Report

Dear Mr. Steg:

The Campbell County Conservation District (CCCD) would like to submit the following comments in response to Wyoming's 2020 Integrated 305(b) and 303(d) Report (IR). Our comments are specific to our mission: To provide leadership for the conservation of Campbell County's soils and water, protect the agricultural resource base, promote the control of soil erosion, promote and protect the quality and quantity of Campbell County's water and all other natural resources, preserve and enhance wildlife habitat, protect the tax base and promote the health, safety and general welfare of the county through responsible conservation ethic. Thus, our comments will be limited to the streams within Campbell County.

Since 2002 the CCCD has taken a leadership role in water quality assessment, planning and implementation within Campbell County. Specifically, CCCD has worked to address waterbodies that are listed on the state's section 303(d) list of impaired waterways. This includes Little Powder River, Donkey Creek, Stonepile Creek and Middle Prong of Wild Horse Creek¹. Please see specific comments below:

1. Watershed maps throughout
 - The CCCD believes that consistency throughout a document will allow for better comprehension. In the first map Figure 7. Wyoming basin and assessed lakes and streams the author establishes the color scheme that should be utilized throughout the document.

¹ Wyoming Department of Environmental Quality. *Wyoming's 2016/2018 Integrated 305(b) and 303(d) Report*. Cheyenne: WDEQ, 2019.

- Other maps should be updated to provide consistency by making category 2 purple, category 3 gray, category 4A green, and category 5 red.
2. Use Support Decision Fact Sheets
 - For ease of use by the reader, CCCD suggests that Wyoming Department of Environmental Quality (WDEQ) format the document so that fact sheets open in another tab and do not take the reader away from the main document.
 - Use Support Decision Fact Sheet: Little Powder River
 - ◊ The “Listing Rationale” should include information about the TMDL alternative. As the sheet currently reads it appears that a TMDL must be completed this year. It is CCCD’s understanding that a “reasonable amount of time” is being allotted for improvements to the watershed post TMDL alternative development.
 - ◊ The third paragraph should be revised to state that best management practices were implemented in the watershed from 2005-2007 and included 12 septic systems and 8 animal feeding operation projects. There were no BMP’s implemented in 2010 by CCCD.
 3. Pg. 4, 2.2.1 Designated Uses and Classifications
 - Under the recreation subheading the CCCD suggests that a reference to the definition/ distinction of primary and secondary recreation be added. This is a common question that comes from the general public as well as from watershed steering committees. Consider referring to USEPA’s Water Quality Standards Handbook².
 4. Pg. 15, Table 2. Wyoming’s 2022 Vision Priorities.
 - On page 14 it is stated that “an updated long-term vision and prioritization schedule will be presented in future IRs.” Although it would have been nice to have a better understanding of the vision that WDEQ is taking over the next two years we will assume that this strategy will be unchanged. We look forward to looking at the longer-term vision and prioritization in the next IR and working with WDEQ to implement their vision.
 5. Pg. 23, Table 3. Waters Moved from the 303(d) List to Category 2 (De-listing)
 - In the line for Middle Prong Wildhorse Creek the highlighted assessment record link does not function. This makes it challenging to comment on its content and accuracy.
 6. Pg. 36, Figure 11. Belle Fourche Basin- Summary Statistics
 - This statistical summary occupies a large portion of the document and only depicts a fraction of 2%. This renders the information statistically insignificant.

² United States Environmental Protection Agency. *Water Quality Standards Handbook, Chapter 2: Designation of Uses*. Washington D.C.: Office of Water, 2012.

CCCD believes that the narrative provides enough information to fully cover the content of the pie charts. If these pie charts are depicting another conclusion, consider stating that in the narrative above.

- If these summary statistics were removed or minimized additional details could be provided to the readers about the progress and timeline for TMDLs or TMDL alternative plans.

7. Pg. 75, Figure 26. Powder River Basin- Summary Statistics

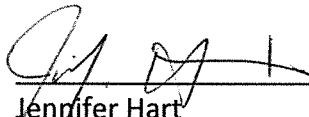
- Same comments as comment number 6.

8. Appendix

- Consider adding an additional table that depicts the waters that have a TMDL alternative plan. This would also allow for information in regards to a “reasonable amount of time” for a TMDL review to be listed so that watershed managers would have a timeline to work towards. At this point the “reasonable amount of time” is not defined in the document.
- Appendix B. List of Completed TMDLs consider adding a footnote to provide explanation for “cycle first listed” as this may not be obvious to all readers.

The CCCD would like to express our appreciation to the WDEQ for moving Middle Prong of Wild Horse from the 303(d) list to category 2. The CCCD looks forward to continuing to work with WDEQ on our other impaired waterbodies in the future. On behalf of the CCCD board of supervisors we appreciate the opportunity to comment and we look forward to working with you in the future.

Sincerely,



Jennifer Hart

District Manager, Campbell County Conservation District

Cc: Wyoming Association of Conservation Districts
Campbell County Commissioners
City of Gillette