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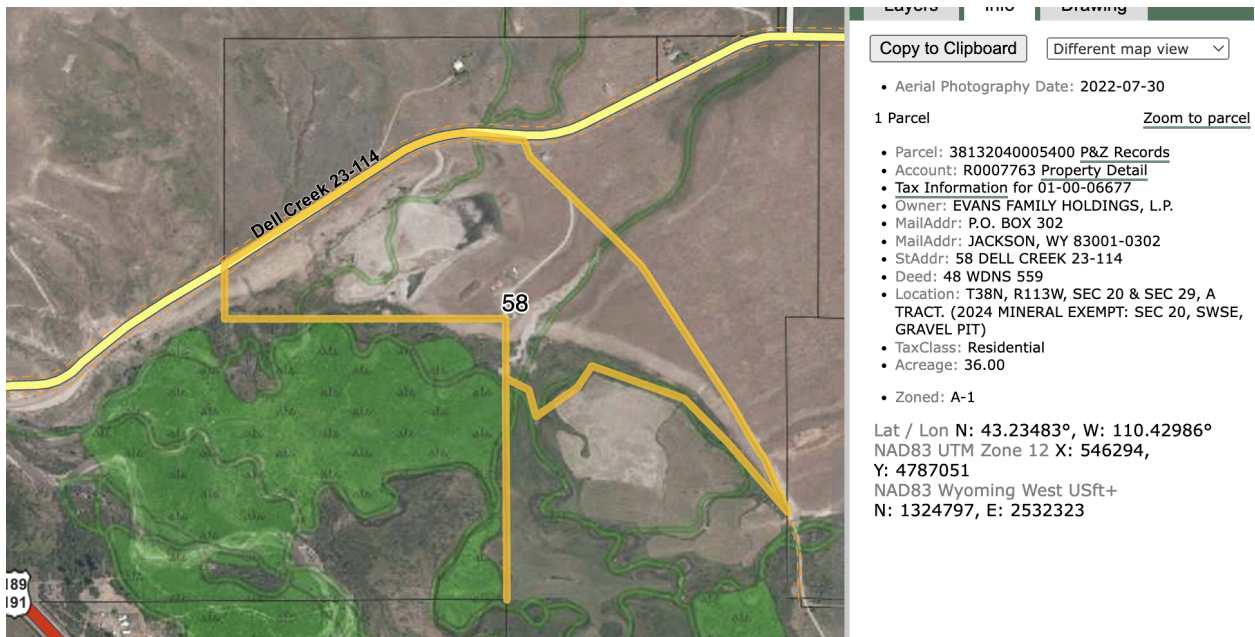
Date: September 5, 2024

To: Wyoming Department of Environmental Quality

OBJECTION: Small Mine Permit Application - Evans Construction Inc

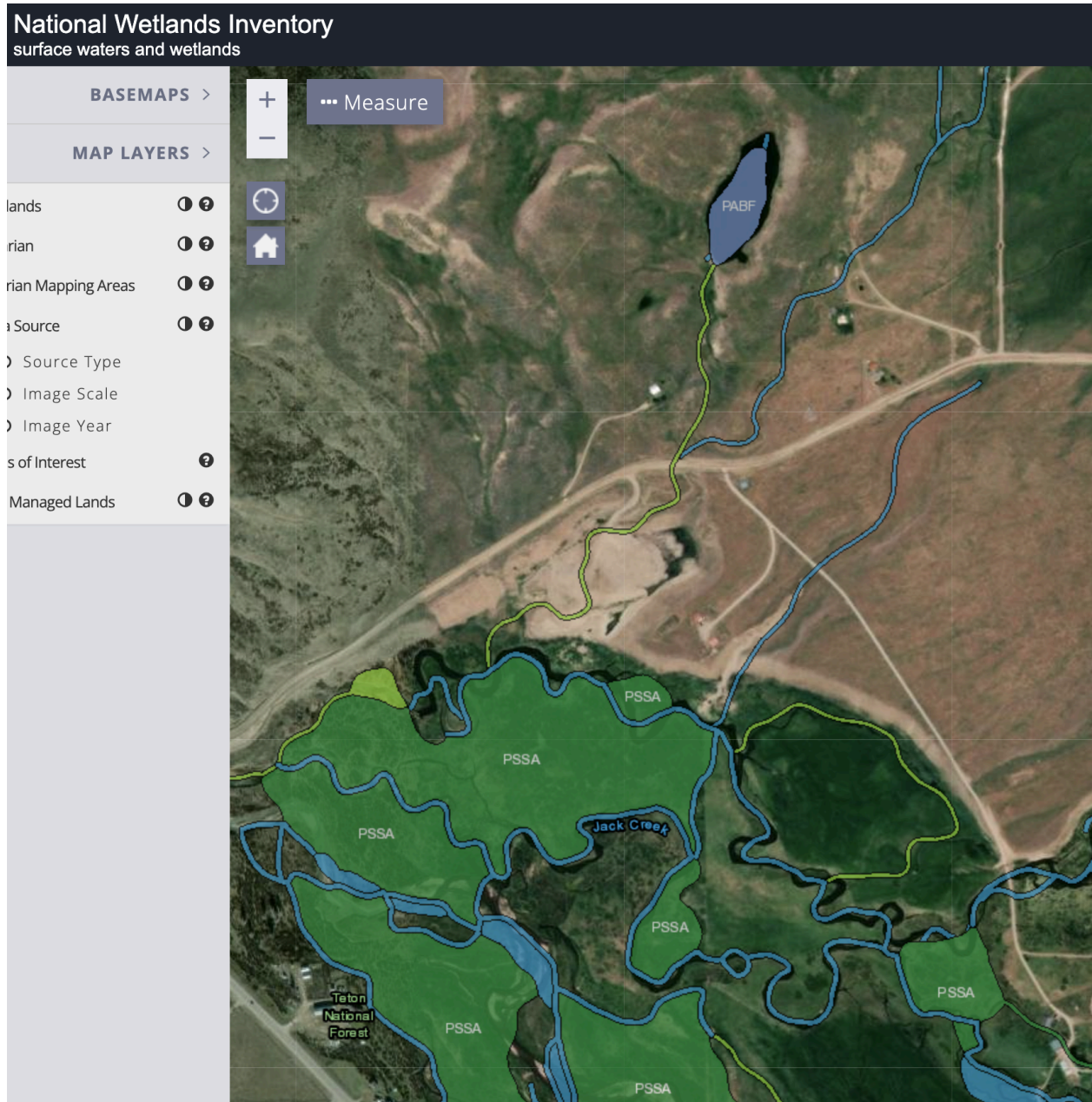
I am a Bondurant resident, who just became aware of the Evans Family Holdings application to develop their property at 58 Dell Creek Rd in Bondurant into a variety of mining and industrial uses including cement and asphalt processing plants. Do you all know where this is located? It is in the middle of critical wetlands habitat identified and mapped by the National Wetlands Inventory of the Fish and Wildlife Service. Do they know what is being proposed on this site? I'm sure some people there would be vehemently opposed as well.

The Evans Family property from the Sublette County GIS viewer is shown below:



Their property from the National Wetlands Inventory website is also shown below:

(<https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>)

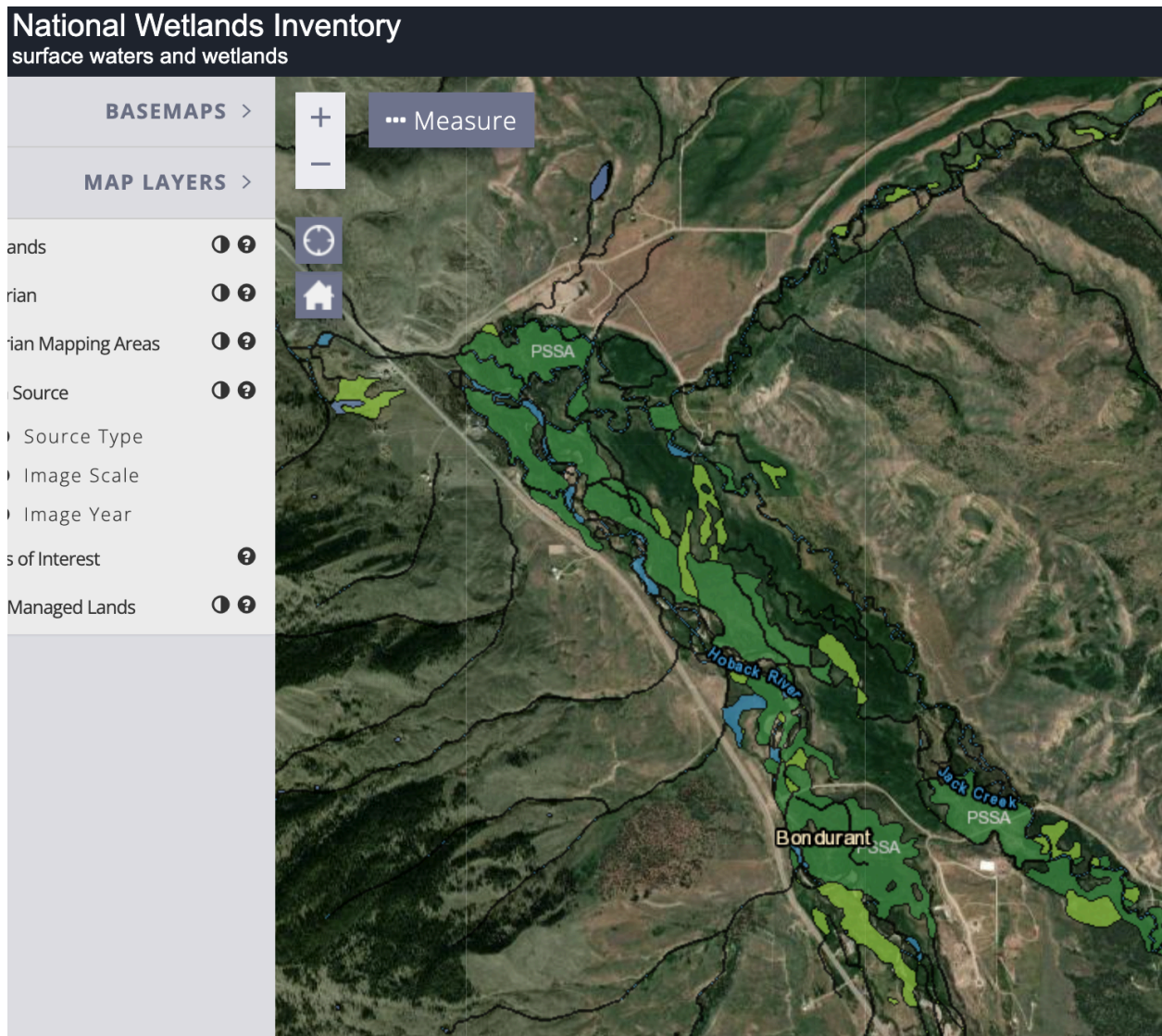


Their property is directly adjacent to the confluence of the Hoback River and numerous creeks, two of which flow through the property. One creek that flows directly through the old gravel pit is identified as Freshwater Emergent Wetland habitat and connects an upstream pond to the extensive wetland area.

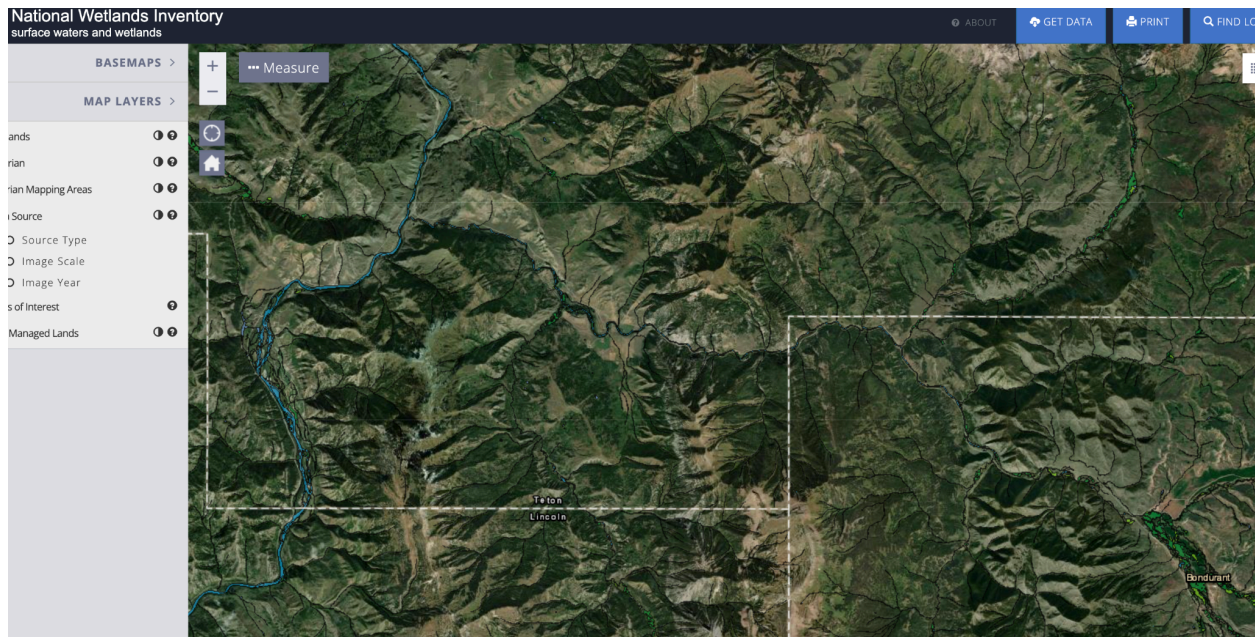
The screenshot displays the National Wetlands Inventory web application interface. The top navigation bar includes the title "National Wetlands Inventory" and "surface waters and wetlands", along with links for "ABOUT", "GET DATA", and "PRINT". On the left, a sidebar contains "BASEMAPS" and "MAP LAYERS" sections, with a "Measure" tool button. The main map area shows a satellite view with wetland boundaries overlaid in green and blue. A yellow line highlights a specific wetland feature. A pop-up window is open over this feature, displaying the following information:

- General** | **Description** | Reports | About
- This 1.16 acre **Freshwater Emergent Wetland** habitat is classified as a **PEM1C**. For a complete code description, click [here](#).
- The wetlands and deepwater habitats in this area were photo interpreted using 1:58,000 scale, **color infrared** imagery from 1982.
- [Zoom to wetland](#)
- [Zoom to project area](#)

As shown below, the wetlands adjacent to the Evans Family tract extends miles upstream and through Bondurant.



Downstream from the Evans property. Hoback flows through bridger Teton National Forest and merges with the Snake River in Teton County Wyoming. Although difficult to see at the scale shown below, it is interesting to note the dearth of downstream wetlands:



As a Bondurant resident and avid outdoorsman, I find it highly objectionable to allow such industrial uses in such a critical location. Two streams cut directly through the property, which will carry pollution directly into the Hoback River adversely affecting everyone and everything downstream.

The application discusses these two streams, but generally brushes them off because “Both drainages flow seasonally (spring-late July) according to the OWNER”. The OWNER is not a dis-interested party and that statement is not true. There is water in the pit now for instance. Based on this false statement by the OWNER, “no wetlands specialist was employed to complete a survey, nor was the US Army Corps of Engineers contacted.” Further, a portion of “the proposed permit area is identified as an Aquatic Crucial Habitat Priority Area (ACHPA)”.

The Storm Water Pollution Prevention Plan also appears to be inadequate and not based on data. Water from at least one of the creeks “will be captured .. by .. a dewatering ditch .. approximately four feet in depth.” “The ditch will continue along the southwest side of the pit and cross under the access road.” Presumably, from there the water flows directly into the Hoback River untreated. Was the upstream watershed modeled with flows calculated for 100 year floods? I don’t see any information on that. On the contrary, the application states “No flow data exists for Dell and Jack Creeks” and that for the Hoback River, “there were no readings taken from 1958 to 2022.” It appears that the SWPPP was arbitrarily created and not based on facts and data.

The adjacent wetlands per the National Wetlands Inventory map are the most extensive wetlands for many many miles. It's crazy to consider this location when there are plenty of alternative locations at least further southeast toward Daniel and Pinedale. Runoff from the proposed facility at this location will certainly pollute the Hoback River. The only question is by how much. Without a thorough analysis by the appropriate experts, that amount is just a guess.

Please do not put our beloved and pristine Hoback River in jeopardy!!!

Please at least send the application back for analysis by the appropriate experts.

Thank you,
Dave
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