

# Patricia Ehrman

2024-09-06

Land Quality Division  
Department of Environmental Quality  
200 W. 187th Street, Suite 10  
Cheyenne WY 82002

Re: EVANS CONSTRUCTION  
Bondurant Pit  
Sections 20 & 29, T38N R113W 6th PM

Administrator, Land Quality Division -

Our property is within the 1/2 radius of the Evans Construction of Jackson WY parcel, currently undergoing DEQ review for an expansion of existing gravel mining operations.

We have no objections to the existing operations, except for the inadequacy of their reclamation efforts, which are addressed below. We do have concerns if the expansion results in significant additional truck traffic on Dell Creek road and the highway.

## 1. Water Quality.

Regarding the proposal for expanded mining, the existing creeks (Jack Creek, Dell Creek, unnamed spring creek), drain directly into the designated Wild & Scenic Hoback River. We are concerned that the gravel dike at the low end of the ponds may be susceptible to erosion and failure in the event of a heavy rain/runoff year. In which case, silt and other pollutants would flow directly into the Hoback.

We suggest the DEQ consider requiring that the settling ponds be lined.

## 2. Reclamation Plan

Page RP-2, paragraph 5, states that topsoil will be distributed, then scarified. We suggest that the compacted subgrade be scarified prior to topsoil distribution.

Page RP-3 states that "standard farming equipment" will be used to seed the site. This is not a useful practice on the slopes, since they will be too steep for "standard farming equipment".

Page RP-3, paragraph d. lists a Reclamation Seed Mix, consisting of six grass species and two wildflower species. The total pounds seeding rate PLS (pure live seed) per acre for the grasses, given each species' seeds per lb and proposed seeding rate, comes to only 71 seeds per square foot. This is completely inadequate, and it explains the sparse and inadequate "reclamation" on the existing reclaimed slopes on the site.

I was taught by the Conservation District professionals that a minimum of 1 seed per square inch is barely adequate, given predation and typical rates of germination. A better mix would result in up to 200-250 seeds per square foot.

The proposed reclamation seed mix seeding rate should be tripled.

Elsewhere in the report, it is stated that temporary seeding of stockpiles will consist of 20 lbs per acre of Wheatgrass. Although the specific Wheatgrass species is not revealed, nevertheless, 20 lbs of wheatgrass seed over an acre comes to approximately 64-73 seeds per square foot. This is inadequate to compete with weeds or retain soils in the face of precipitation or wind.

The proposed Wheatgrass seeding rate should be tripled.

Page RP-5 states that "the two permanent ponds will be wildlife ponds". The anticipated side slopes of these ponds are way too steep for wildlife ponds. The majority of the pond's banks should have side slopes no steeper than 1:10, to allow wildlife to safely access the ponds. Teton County Wyoming's LDRs provide extensive analysis of safe pond construction for wildlife use.

Thank you for the opportunity to comment on the proposed plan.

Patricia Ehrman and Richard Collard

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14487 Highway 191

Bondurant WY 82922