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**Wyoming Association of Conservation Districts**

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June 26, 2013

Lindsay Patterson  
Wyoming Department of Environmental Quality  
4<sup>th</sup> Floor West, Herschler Bldg.  
Cheyenne, WY 82002

**FILED**

**JUN 27 2013**

**RE: Chapter 1 Surface Water Quality Standards; May 13, 2013**

Dear Ms. Patterson,

Jim Ruby, Executive Secretary  
Environmental Quality Council

The Wyoming Association of Conservation Districts (WACD) appreciates the opportunity to provide additional input on the proposed revisions to Chapter 1, Surface Water Quality Standards.

**General comment in regard to modification of "waste" to "pollution" Section 24. Dissolved Oxygen; modification of "effluent" to "pollution" Section 25. Temperature; "wastes" to "pollution" Section 26. pH**

**COMMENT:** The Association understands based on conversations with DEQ personnel that the modification is intended to address both traditional point source "wastes" and "effluent" as well as nonpoint source contributions thereby bringing the language into conformance with current application of the standards and the overall water quality program.

In essence the change from "waste" and "effluent" to "pollution" would not have any practical impact to how DEQ would evaluate data in terms of a standard exceedence. Further, WACD understands that as it pertains to the temperature and pH standard that DEQ would utilize a weight of evidence approach in making an impairment determination. WACD appreciates confirmation in response to comments that this understanding is correct.

**Section 27. E. coli Bacteria**

**COMMENT:** WACD continues to support DEQ's modification to the E. coli standard to a 60 day period versus a 30 day period. WACD also understands DEQ's decision to place the sampling frequency and duration in the Methodologies document. WACD does want to reiterate the importance of this methodology being modified so that sampling occurs over the 60 day period which is more representative of the contact recreation season. During the WACD September 2012 area meetings this change was discussed and there was broad based support among the local Conservation Districts for this change and most all have their sampling plans established to collect data over the recreation season.

WACD understands and supports DEQ's decision to include the sampling frequency and geometric mean criteria in the Listing Methodologies. WACD continues to support efforts to modify the sampling from 5 samples separated by 24 hours to the longer separation period.

**Section 33. Reclassifications and Site Specific Criteria**

**COMMENT:** WACD appreciates DEQ's work on the UAA model to date. The Association and the member districts are hopeful that this model will be released for public review and comment in the near future as it is extremely important that this effort move forward so that accurate water body classifications can occur. This will ensure that resources can be targeted towards the state's priority water quality issues.

Thank you for the opportunity to comment.

Sincerely,



Shaun Sims  
President

cc: Department of Agriculture  
Conservation Districts