



Wyoming  
DEPARTMENT OF *Agriculture*

Matthew H. Mead, *Governor*  
Doug Miyamoto, *Director*  
2219 Carey Ave. • Cheyenne, WY 82002  
Phone: (307) 777-7321 • Fax: (307) 777-6593  
Web: agriculture.wy.gov • Email: wda1@wyo.gov

*The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.*

September 22, 2015

Richard Thorp  
WDEQ/WQD Herschler Building 4-W  
122 West 25<sup>th</sup> Street  
Cheyenne, WY 82002

Dear Mr. Thorp:

Following are the comments from the Wyoming Department of Agriculture (WDA) on Wyoming Department of Environmental Quality's (WDEQ) 2<sup>nd</sup> DRAFT 2014 Integrated 305(b) and 303(d) Report.

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As the Draft Integrated Report affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important you continue to inform us of proposed actions and decisions and provide us the opportunity to express pertinent issues and concerns.

The WDA would like to thank WDEQ for the opportunity to comment on the 2<sup>nd</sup> Draft Report. WDA appreciates the time and detailed attention WDEQ put towards ours and other organization's comments provided during the first comment period. WDA collaborates with our Conservation District partners by funding water quality monitoring projects and watershed planning activities. Collection of credible water quality data remains a high priority for WDA and our partners.

The WDA has the following general comment:

The WDA appreciates and strongly supports the WDEQ's decision to remove from the 2014 303(d) list; Clark's Draw, Lander Creek, and Pacific Creek, due to data quality concerns associated with the original listing decision. It is imperative the data utilized for listing determinations meet the statutory and regulatory requirements. To that end, the WDA believes it is crucial for WDEQ to maintain consistency with W.S. 35-11-103(c) (Xi) and Chapter 1, Section 35 of the WDEQ's Water Quality Rules and Regulations to assure water quality monitoring is conducted in a manner that allows collection of credible, and scientifically defensible data to make determinations. We commend WDEQ for confirming laboratory and field methods and equipment were being properly utilized, ensuring proper Quality Control/Quality Assurance procedures are followed, ensuring individuals had the required specialized training needed to perform monitoring activities, and ensuring there are no preconceived biases associated with the data collection process. Clarity in these areas will only help WDEQ in the integrity and defensibility of data submitted.

WDA remains concerned regarding data collected and submitted by special interest groups with a significant bias against Wyoming's livestock or other industries. WDA, together with our partners, works to ensure that our water quality monitoring programs provide credible and representative data to help characterize Wyoming's water. Agenda driven

*Equal Opportunity in Employment and Services*

**BOARD MEMBERS**

Jana Ginter, *District 1* • James Rogers, *District 2* • Shaun Sims, *District 3* • John Moore, *District 4* • Alison Lass, *District 5*  
Bryan Brost, *District 6* • Kevin Schieffer, *District 7*

**YOUTH BOARD MEMBERS**

Kendall Roberts, *Southeast* • Richard Schlenker, *Northwest* • John Hansen, *Southwest* • Cameron Smith, *Northeast*

9/22/2015

Page 2 of 2

data collection will be an ongoing problem and we are committed to assist WDEQ in any way to maintain the integrity of the State's water quality monitoring program.

Again, we would like to thank WDEQ for their decision to remove the three listed Creeks', and for the opportunity to comment.

Sincerely,

*Stacia Berry*  
*for Doug Miyamoto*

Doug Miyamoto

Director

DM/jc

CC: Governor's Planning Office Wyoming  
Wyoming Game and Fish department  
Wyoming Board of Agriculture  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board  
Wyoming Association of Conservation Districts