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# Wyoming Department of Agriculture

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May 4, 2000

Art Reese, Director
Office of Federal Land Policy
Herschler Building, 1W
122 W. 25th Street
Cheyenne, WY 82002

Dear Art:

Following are our comments on the Draft Policy on the ***"Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management"*** published for comment in the federal register on February 22, 2000. These comments regarding this Draft Policy are specific to WDA's mission within state government which is to assist the citizens of Wyoming to live safe and healthy lives, promote and preserve our agricultural community, be responsible stewards of our natural resources, and achieve integrity in the market place. In that regard, these comments are meant to, in association with all other agency comments, assist in defining the State Position. These comments defer to and are subordinate to the State Position.

The Wyoming Department of Agriculture supports the watershed planning concept to achieve natural resource goals and objectives. We have been working with the Wyoming Association of Conservation Districts (WACD) and other state agencies and partners toward achieving this goal. Local conservation districts in Wyoming have taken the lead in this process and are working hard to include local producers, state and federal agencies, and all other stakeholders in this process. They have made great strides in achieving this goal. At this time, there are approximately 25 watershed planning efforts at various stages in the state. Where federal lands are part of these watersheds, federal land management agency representation has been invited, and present, from the initial planning stages. In addition, in 1998 the Wyoming State Legislature funded $379,000 to local conservation districts to be trained and equipped to collect credible data. The 2000 Legislature also funded $200,000 for water quality concerns in the state.

All of the above are examples of the commitment and efforts at the local level aimed at pursuing comprehensive watershed planning utilizing sound science.

Our comments are submitted based on a review of the policy coupled with information obtained from the public meeting held in Denver, Colorado on March 13, 2000.


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**GENERAL COMMENTS:**

The Association has several concerns with some of the intents and purposes of this policy. These concerns are based on several factors, including, but not limited to the following:

• The narrative language contained in the Clean Water Action Plan prefacing this particular key action, contains the following statement: ***"Activities such as road building, logging, mining, grazing, hydrologic modification, or excessive recreational use can degrade the integrity of these watersheds and require actions to reduce their harm."*** (Clean Water Action Plan, page 30).

**Comment:** Based on the above language it is apparent to us that the purpose for this policy may have been determined. The intent is obviously based on the notion that virtually all land use activities can be degrading to the watershed, regardless of the method in which they are conducted. The states develop Best Management Practices to ensure that all of the above activities are conducted in a manner to protect the resource while meeting multiple use objectives. The above language indicates that regardless of how the activity occurs it may be degrading the watershed. It appears that the focus of the policy may be geared toward eliminating multiple use activities.

• The policy is extremely vague and lacking in specifics. Adequate NEPA analysis could have identified and defined the specific issues. This concern was solidified during the public meeting held in Denver in March. An attendee questioned how the agencies would know how they achieved the intent of the policy. One of the presenters who was involved in developing the policy, had great difficulty responding. If individuals involved in developing the proposal cannot respond adequately to this question, it is unclear why the policy is being developed.

• The policy is calling for actions and processes to be completed that are redundant to initiatives already being mandated by EPA through "authority" directed by the Clean Water Action Plan. More specific comments will be provided under the applicable section of the proposed policy.

• The policy ignores the primacy of states that have delegated authority for implementing the Clean Water Act. It appears the policy is another attempt to circumvent the role and primacy Congress intended for the states in implementing the provisions of the Clean Water Act.

• The policy appears to substantially modify the management approach to federal lands. However, as indicated at the meeting in March, there is no intent to issue planning regulation amendments. We question the agency's determination that rule changes are not necessary and that substantial changes in federal land management processes can be implemented with a two-page policy.

**Specific comments on the policy:**

1) **Page 8837; Introduction** The introduction states ***"The goal of the Clean Water Action Plan is to accelerate the progress this Nation has made in improving the quality of its waters since passage of the Federal Water Pollution Control Act of 1972, as amended (commonly referred to as the Clean Water Act). Federal agencies manage large amounts of public lands throughout the country. In the interest of protecting water quality, the Clean Water Action Plan announced the intention of Federal agencies to adopt a policy***

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***that will reduce water pollution from Federal activities and foster a unified, watershed-based approach to land and resourc3e management. Implementation of the following proposed policy will improve water quality and aquatic ecosystems on Federal lands and will further the use of a watershed approach to federal land and resource management activities."***

**Comment:** Again, it is troublesome that the introduction repeatedly refers to the Clean Water Action Plan as if it was a law that was enacted, investing additional authorities to the federal agencies. If the intent is truly to address resource planning and management on a watershed basis, then it is incomprehensible why the policy ignores the fact that it is highly unlikely that watersheds contain only federal resources and that this watershed approach can be applied strictly to federal lands and still accomplish the intent of watershed planning. This leads to the next concern, which is the impact of the policy upon private lands. At the meeting held in Denver, the attending public was reassured that the policy has no affect on private lands. A review of the policy shows it will affect private lands and landowners.

*2)* **Page 8837; Policy Goals** - The policy refers to the ***"managing the Federal lands, resources, and facilities in our care".***

**Comment**: The glossary section does not provide a definition of "resources". To clearly understand the policy's intent and application, a definition needs to be provided.

The policy goals recognize that there are existing programs for watershed protection and improvement currently underway and the policy is intended to enhance these programs. The policy goes on to identify six guiding principals to achieve the two identified goals.

***Principle A. (.17.1)*** ***"Use a consistent and scientific approach to managing federal lands and resources and to assess, protect, and restore watersheds."***

**Comment:** Although this principle states a very laudable intent that we support, the policy lacks specific detail on how this will be accomplished. We suggest that if the policy is truly intended to bring consistency among the federal agencies that the agencies incorporate the following:

A. Watershed Assessments: One of the basic fundamental challenges in efforts to pursue watershed assessments is the lack of consistency between local, state and federal entities on the level of science being collected for determination of watershed health. In addition, the federal agency monitoring process does not appear to consider geology, climate, soils, hydrology, stream succession, etc. Nor are the protocols, and ultimately the analysis of resource health, consistently applied. In addition, both the Forest Service and BLM monitoring activities are lacking in adequate science to determine water quality. BLM tends to make determinations on water quality without any water quality data (Proper Functioning Condition). They utilize subjective physical information solely. Although we do not oppose the collection and use of this information, it should not be misapplied to make water quality determinations or watershed health assessments. Wyoming BLM state office personnel have made efforts to work cooperatively with Wyoming's local conservation districts. A staff

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person has attended the watershed management and water quality monitoring training that WACD and we provide. In addition, WACD representatives have attended BLM staff meetings to present the watershed planning effort and discuss methods for working together. As well, Wyoming DEQ has begun to convene meetings to discuss watershed based activities. These meetings are being held primarily to coordinate with local, state, and federal agencies. In addition, several watershed-based efforts initiated by local conservation districts include federal agency personnel. Among these are the Muddy Creek Watershed, Big Horn River, Willow Creek, North Fork Crazy Woman, Reardon Draw, and Loco Creek. At the meeting in Denver, based on questions posed to the presenters, it was apparent that the intent of the policy is not to provide additional training and dollars to be targeted towards monitoring activities. Based on the above, we suggest that the following actions should be addressed in order to bring consistency:

All of the agencies agree to and utilize a set level of scientific data when making various resource health decisions and specifically water quality determinations. Wyoming's legislature adopted language to define credible data in 1999. ***(Attachment A)*** This is a common definition that is being utilized by the Wyoming Department of Environmental Quality and local conservation districts. The language is consistent with the following federal regulations for implementing provisions of the Clean Water Act:

**40 CFR § 130.0(b)** **Water Quality Planning and Management**. Water quality standards (WQS) are the State's goals for individual water bodies and provide the legal basis for control decisions under the Act. **Water quality monitoring activities provide the chemical, physical and biological data needed to determine the present quality of a State's waters and to identify the sources of pollutants in those waters.** The primary assessment of the quality of a State's water is contained in its biennial Report to Congress required by section 305(b) of the Act. **(emphasis added)**

**40 CFR § 130.4(b)** **Water quality monitoring.** **The state's water monitoring program shall include collection and analysis of physical, chemical and biological data and quality assurance and control programs to assure scientifically valid data. The uses of these data** include determining abatement and control priorities; **developing and reviewing water quality standards**, total maximum daily loads, wasteload allocations and load allocations; assessing compliance with National Pollutant Discharge Elimination System (NPDES) permits by dischargers; reporting information to the public through the section 305(b) report and reviewing site-specific monitoring efforts. **(emphasis added)**

We recommend that the information necessary to determine watershed health be based on the above language, therefore providing consistency in the watershed assessment, planning, and implementation process.

B. Training/Education: In order for the above data to be collected with a consistent method, We recommend that the Departments not only encourage but require federal agency personnel who are responsible for these watershed management activities or related resources management, to attend training sessions. Although some states may not provide such a curriculum, the

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federal agencies could certainly take the initiative among their own staff. In Wyoming, the WACD offers five phases of training. Participation of local Forest Service or BLM staff in this training would be welcome. This would enable all to approach the assessment of our watersheds with a common understanding of concerns.

C. Resources for collection of credible data - The agencies should provide adequate resources, redirected from other redundant programs if necessary, to allow their personnel to actively collect the necessary science for land and water resource management. An example of opportunities to redirect funds is the meeting held in Denver. There were 18 federal employees present at the meeting. Of the 18, seven were from Washington, D.C. There were approximately eight members of the public attending the meeting. The monetary expenditure to conduct the meeting in Denver was substantial. These funds could have been redirected to the field level where they could be more beneficially used. We are not purporting to support an increase in appropriations to agency budgets, however, we would support and encourage a redirection of resources to ensure a science-based, on-the-ground approach is being implemented.

The policy states that there are two basic goals to promote a watershed approach to prevent and reduce water pollution from federal land and resource management activities and accomplish this in a unified and cost-effective manner. The above comments should be given serious consideration if the agencies intend to achieving the above goals.

In addition, it is questionable why the process of evaluating, categorizing and prioritization for the focus of resources and actions will occur long before any effort is made to collect data and information. Based on the method proposed, there will be no effort or activity to collect data until 5 years into the process.

**Principal B (.17.2):** ***"Identify specific watersheds in which to focus our budgetary and other resources and accelerate improvements in water quality and watershed condition."***

***Comments:*** EPA directed states in May 1999 to complete "Unified Watershed Assessments". These assessments, as described in EPA's memos and directives, mirror the assessments described in the draft policy. Based upon our review of various western states' Unified Watershed Assessments (UWA), the states included federal agency personnel. Obviously, based upon a sampling of these assessments, the process was conducted regardless of jurisdictional boundaries. When the question of duplication was posed to presenters at the Denver meeting, four separate and distinctly different answers were provided. One answer indicated the policy was the next step after the assessment process. When questioned, how that next step, described as planning for the watershed, was different than EPA's other directive for Watershed Restoration Action Strategies, a different agency representative indicated that they understood the policy was to focus on smaller sub-watersheds than those being addressed by states. However, Wyoming resisted the UWA process given that insufficient data existed on an 8 digit hydrologic unit to make a watershed health determination. EPA's response to this was: "We note first, you do not have to work at the 8-digit HUC scale; several states have opted to work at a smaller scale." ***(Correspondence from Region VIII EPA dated January 12, 1999)***

This again demonstrates the lack of understanding among the federal agencies on the purpose of the policy.

The policy does not define the size of watersheds being discussed. It is assumed that the specific scale will be determined at the state level. In Wyoming, the various agencies are currently in the process of

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developing a common 14-digit hydrologic unit map, which will take at least another year to accomplish. This is the scale of watershed that is utilized by the USDA Natural Resources Conservation Service. There is a major problem with inconsistency from one agency to the next as to the size of the watershed. Given the one-year effort to initiate and process this policy, the agencies drafting this policy should have recognized that existing approach.

**Principle C (.17.3).** ***"Use the results of watershed assessments to guide planning and management activities in accordance with applicable authorities and procedures."***

**Comments:** The ultimate actions that may be taken as a result of this policy may pose conflicts between applicable authorities and procedures.

**Principle D (.17.4).** ***"Work closely with states, tribes, local governments, and stakeholders to implement this policy.***

**Comments:** We question if this policy is necessary, given the actions and activities related to water quality and resource management on a watershed basis that have been initiated either by state or local governments. At the meeting in Denver, agency officials said state water quality agencies supported the policy. However, we understand that only six states submitted comments, one of which recommended that the policy be withdrawn until pending Clean Water Action Plan litigation was resolved.

**Principle E (.17.5).** ***"Meet our Clean Water Act responsibility to adhere to Federal, State, Tribal, interstate, and local water quality requirements to the same extent as non-governmental entities."***

**Comments:** It is obvious that the federal agencies clearly need to address their contribution to water quality impairments. However, it is unclear how this particular policy will result in federal agencies adhering to water quality standards. As an example, the Yellowstone National Park has been issued notices of violations from the Wyoming DEQ for water quality violations as a result of sewage spills into surface waters in the park. These spills occur due to outdated and dilapidated treatment facilities. However, the state can do nothing more than issue a notice of violation. The state cannot assess any monetary penalties against the federal government. We recommend that if agencies are as committed to adhering to water quality standards as any other individual or entity would be, then the state's should be allowed to assess penalties just as they would to any other individual or entity.

**Principal F (.17.6).** ***"Take steps to ensure that Federal land and resource management actions are consistent with Federal, State, Tribal, and, where appropriate, local government water quality management programs."***

**Comment:** We endorse the intent of this language. However, it is unclear why the policy is necessary to achieve this means. Quite frankly, several local conservation districts and other local and state governments have attempted to be involved in federal land management planning activities. Conversely, local governments invite and involve federal agency personnel where federal lands are within a watershed,. Where these partnerships occur, great success in resource management is made. However, it is continually frustrating that although the agencies purport coordination, they consistently ignore provisions of NEPA which provide that where state and local governments have jurisdiction by law or special expertise, they should be granted cooperating agency status on federal land management planning activities. Merely following the intent and mandate of NEPA, coupled with encouragement and empowerment of local field personnel to participate in locally initiated watershed planning efforts

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would accomplish this "principal."

Also, the language "where appropriate" is vague. If the policy is adopted, it should be clarified.

**Page 8837; II. Agency Objectives; 1st paragraph states**: ***To accomplish these policy goals,...All agencies will implement this policy as individual agency laws, missions, and fiscal and budgetary authorities and resources permit."***

**Comment:** It would seem logical that prior to developing and issuing this policy, the agencies would have ensured that the goals and actions proposed in the policy were permissible under individual agency laws, missions, and that fiscal resources were sufficient. The mere fact that this language is in the policy indicates that there may be some conflicts or limitations that exist between the intent and goals of the policy and current authorities.

**Sections A. 1. A. through d.;**

**Comment:** We have provided detailed comments on the approach being proposed for watershed assessment procedures, watershed delineation, and coordination with watershed efforts.

**Section A. 2. A through d; states**: ***"We will conduct watershed assessments for watersheds that have significant Federal lands and resources."***

**Comment:** The term "significant" is not defined in the glossary provided. At the Denver meeting, officials said a "significant" definition had not been developed and that those submitting comments should say whether the term should be defined. In addition, it was stressed at the public meeting that the policy does not apply to or affect private property. However, unless "significant" is defined as solely federal lands there will be an impact on private property. It is assumed that in watersheds identified as "impaired", "high priority", or some other category indicating water quality impairments, some map or delineation will be published. If the federal agencies ever categorize a watershed as priority and there are private lands within that watershed, then this policy does affect private lands. It is unfathomable how the agencies could even begin to suggest that there would be no affect on private property. In Wyoming, nearly all watersheds contain mixed ownership. Therefore, if the agencies truly intend for this policy to affect only federal lands, then it should so stated. In most instances, this approach would defeat the purpose of a watershed approach. Therefore, we suggest that the policy be withdrawn. A commitment should be made by the agencies to support watershed planning efforts initiated by state and local governments. The necessary resources to accomplish these watershed-based efforts are provided to the state and local governments, without the top down edicts, which fail to recognize local conditions. This would truly reflect what Congress intended to occur in the implementation of the Clean Water Act. This is supported with the language in the CWA at § 101(b) which states: **"It is the policy of the Congress to recognize, preserve, and protect the primary responsibilities and rights of States to prevent, reduce, and eliminate pollution, to plan the development and use (including restoration, preservation, and enhancement) of land and water resources, and to consult with the Administration in the exercise of his authority under this Act**.

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**Section B. 1 a through b.6; states:** ***"We will work collaboratively to identify priority watersheds"***

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**Comment:** This section goes on to provide a list of criteria or the process in which the agencies will determine priority watersheds. It is interesting to note that of the six criteria listed for determining priority watersheds, not one is directly related to scientific data indicating water quality degradation. Even though the goal of the policy is for federal agencies to comply with the Clean Water Act. Specifically, one of the policy's goals states: "use a watershed approach to prevent and reduce water pollution resulting from federal land.."

**Section B. 1. b. (3) states**: "Magnitude of water quality impairment, impacts to aquatic resources, and/or ***changes to flow regime." (emphasis added)***

**Comment:** We are unclear what the intent is of the federal agencies to include flow regime. However, We remind the agencies that the Clean Water Act states the following: ***§ 101(g): "It is the policy of Congress that the authority of each State to allocate quantities of water within its jurisdiction shall not be superseded, abrogated or otherwise impaired by this Act. It is the further policy of Congress that nothing in this Act shall be construed to supersede or abrogate rights to quantities of water, which have been established by any State."***

If the intent is to affect in any way, legally appropriated water rights, then this language should be deleted.

**Section B. 1. b. (4)** This language was addressed above in comments related to duplication of watershed assessments being conducted by state and local governments.

**Section B. 1. b. (5) states** ***"Vulnerability of the watershed to degradation".***

**Comment:** This criterion only raises a myriad of questions as to how the agencies would determine a watershed's vulnerability to degradation.

**Page 8838; B. 2. Through its entirety to section C.**

**Comment:** Again, it is unclear, and this section solidifies this uncertainty, as to why the policy is necessary. This section discusses addressing nonpoint source pollution, implementation of Best Management Practices, total maximum daily loads, complying with state water quality standards, etc. Based on our knowledge, these efforts are already occurring in various forms such as the large comprehensive Forest or BLM area planning processes, timber management, grazing strategies and management, coordination with states on water quality standards issues, etc. We again recommend that the agencies merely make a commitment to watershed planning and involvement in such efforts.

**Page 8838; section C. in its entirety**

**Comment:** This section is too vague to even provide meaningful comment. However, it is apparent through this section that there are changes in multiple uses in store as a result of this

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policy. This is a conclusion based on current agency trends to phase out uses and management practices such as timber harvesting, grazing, etc. and the language contained in the CWAP.

**Section D.** "*We will enhance collaboration*".

**D. 3. b.** states "***Provide opportunities for interested stakeholders to participate in monitoring and assessing watershed conditions and in implementing watershed restoration projects.***

**Comment:** This statement clearly causes concern. On face value, given the lack of specifics contained in the policy, one can interpret this statement that any interested public will be invited and encouraged to monitor and assess watersheds. There is no mention, whatsoever, of any minimum qualifications for participation from stakeholders. Again, it is imperative that the federal agencies consult with and maintain consistency with the state's approach. Clearly, there must be some threshold established for the level of expertise necessary for stakeholders to be involved in the collection of scientific data.

**D. 3. d. states:** ***"Seek early feedback on key decisions affecting watershed management through the Watershed Forum process called for in the Clean Water Action Plan and carefully consider this feedback in agency decision making."***

**Comment:** This statement is a prime example of how the agencies are treating the Clean Water Action Plan as an authorizing law, rule or regulation. The public input processes for federal planning activities are clearly governed by the NEPA, Administrative Procedures Act, and other federal laws. Yet, the policy sets forth that a "new" process will be followed. One contained in a Plan that was not subjected to Congressional review. The Clean Water Action Plan discusses the National Watershed forum and indicates a ***"....Forum will be convened to provide a coordinating mechanism for the development of watershed assessment, restoration, and protection efforts. The Forum will include a total of about 20 members, including representatives of: federal agencies, state agencies, tribal governments, local governments, other stakeholder organizations, and watershed partnerships and citizens." (Clean Water Action Plan, page 87)***

There is no discussion of these reviews and/or decisions being made at the local level within the affected watershed. Further, there is no mention of private landowners serving on this Forum. Given that this policy will impact private lands, it is necessary to involve landowners.

**D. 4. States:** ***"We will expand opportunities for dialogue with private landholders in priority watershed with a mix of Federal and private lands, we will work with private sector landholders to involve them in the watershed management process. We will work closely to ensure that Federally funded projects involving private cost-share partners fully consider watershed management objectives for both public and private lands."***

**Comment:** At the meeting in Denver, agency representatives strongly assured attendees that the policy **does not affect private land. (emphasis added)** It appeared that this emphatic proclamation was presented in anticipation of concern over a federal dictate of private land

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management. This concern is well founded based on our comments above. This policy will affect private landowners. In addition, landowners are involved after the process of monitoring, assessing, prioritizing/categorizing, development and implementation of management practices, and collaboration with stakeholders. This demonstrates the lack of understanding and recognition that the federal agencies, who prepared the policy, have of private property rights and working with private landowners voluntarily and cooperatively on resource management activities.

There are numerous examples in Wyoming and throughout the west, where the majority of federal lands are located, that demonstrates private landowner commitment to sustainable resource management. This section sends a message that private landowners are an afterthought.

**D. 5 & 6;** ***related to water quality monitoring and training***

**Comment**: As stated previously, We offer and recommend that in Wyoming the federal agency personnel participate in an already existing high quality training program that will provide a consistent approach and understanding to watershed assessment, planning and management regardless of the jurisdiction. In Wyoming many of these efforts are being led by the WACD and conservation districts. Three full training sessions for phases I through III have been held to date. Over 100 people have received the same level of consistent training. Attendees included representatives of Conservation Districts, Bureau of Land Management, Wyoming Department of Agriculture, Natural Resources Conservation Service, Cooperative Extension Service, Teton Science School, Wyoming Department of Environmental Quality, private landowners, Audubon Society, Wyoming Riparian Association, attorneys, individual citizens, and Wind River Reservation Environmental Quality Council. Attached is a listing of the phases of training being provided and the equipment each local conservation district has received to collect credible data. **(Attachment B)**

In closing, We suggest that if federal land management agencies are truly interested in resource management on a watershed basis, then a sincere commitment needs to be made to work with state and local governments. Jointly the entities can discuss the development of a common process for approaching watershed management including a consistent understanding of the type of credible data necessary to assess watershed health. The federal agencies need to recognize the primacy of states in implementing the Clean Water Act, and most ***importantly*** recognize and respect the rights of those landowners with property located within these watersheds.

Thank you for the opportunity to comment.

Sincerely,

Ron Micheli

Ron Micheli
Director, Wyoming Department of Agriculture

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Attachment A: ***Wyoming Credible Data legislation - 1999***
Attachment B: ***Wyoming Conservation District Training program and equipment***

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ORIGINAL SENATE
FILE NO. 0027

ENGROSSED

ENROLLED ACT NO. 47, SENATE

FIFTY-FIFTH LEGISLATURE OF THE STATE OF WYOMING
1999 SESSION

AN ACT relating to public health and safety; amending the water quality permitting requirements as specified; providing for rules and regulations; providing definitions; and providing for an effective date.

Be It Enacted by the Legislature of the State of Wyoming:

Section 1. W.S. 35-11-103(c) by creating a new paragraph (xix) and 35-11-302 by creating new subsection (b) are amended to read:

35-11-103. Definitions.

(c) Specific definitions applying to water quality:

(xix) "Credible data" means scientifically valid chemical, physical and biological monitoring data collected under an accepted sampling and analysis plan, including quality control, quality assurance procedures and available historical data.

35-11-302. Administrator's authority to recommend standards, rules, regulations or permits.

(b) The administrator, after receiving public comment and after consultation with the advisory board, shall recommend to the director rules, regulations and standards to promote the purposes of this act. The rules, regulations and standards shall prescribe:

(i) A schedule for the use of credible data in designating uses of surface water consistent with the requirements of the Federal Water Pollution Control Act (33 U.S.C. sections 1251 through 1387). The use of credible data shall include consideration of soils, geology, hydrology, geomorphology, climate, stream succession and human influence on the environment. The exception to the use of credible data may be in instances of ephemeral or intermittent water bodies where chemical or biological sampling is not practical or feasible;

(ii) The use of credible data in determining water body's attainment of designated uses. The exception to the use of credible data may be in instances where numeric standards are exceeded, or in ephemeral or intermittent water bodies where chemical or biological sampling is not practical or feasible.

Section 2. This act is effective July 1, 1999.

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# Wyoming Water Quality Monitoring Training Program

**Phase I: Understanding watershed principles**

**Phase II: Developing an overall water quality monitoring plan**

**Phase III: Equipment calibration, care, and use techniques and Lab coordination**

**Phase IV: Field Training – Collecting credible data**

**Phase V: Data interpretation and analysis**

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**Conservation Districts in Wyoming were supplied with:**

Flow Probe
Gloves
Chest Waders
Surber Sampler
200' Tape
Brush
Plexiglass
Survey Rod/Case
DH 48 Integrated Sampler
Sieve Bucket
Green Tub
GPS Unit/Case
EcoWatch Software
Clinometer/Case
YSI 610 DM
Camera/Bag/Battery
Wash Bottles
Multiparameter Probe

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