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June 12, 2018

Kevin Frederick, Administrator
Water Quality Division
Department of Environmental Quality
200 W. 17th St., 4th Floor
Cheyenne, WY 82002

Re: Error in DEQ Categorical Use Attainability Analysis for Recreation—Townsend Creek,
Lander, Wyoming

Dear Mr. Frederick,

On behalf of the Wyoming Outdoor Council and its members, I am writing to call your attention to an error made in the September 2016 *Categorical Use Attainability Analysis for Recreation* (UAA). The Wyoming Outdoor Council's mission is to protect Wyoming's environment and quality of life for future generations. Our supporters believe that maintaining clean water for primary contact recreation is essential to this mission.

A portion of Townsend Creek was inappropriately downgraded to secondary contact recreation under the UAA because the data set did not include Frye Lake dispersed campground, a heavily used dispersed campsite in the Shoshone National Forest near Lander, Wyoming.¹ Per the UAA, any surface stream located within a 0.5 mile buffer around a dispersed campsite that is on public land and within 0.25 miles of a road should be protected for primary contact recreation.² This downgrade was inappropriate because the downgraded section is located within 0.5 miles of the Frye Lake National Forest Service dispersed campground in the Shoshone National Forest which is located within 0.25 miles of Lake Louis Road. Therefore, I respectfully request that the DEQ correct this error and immediately upgrade all of Townsend Creek for primary contact recreation.

As you know, the 2016 downgrade exposes children and other recreators to increased levels of fecal contamination. Failure to upgrade the stream will perpetuate this exposure through another busy summer season. This is unacceptable and contravenes the 2016 UAA. On June 5, 2018, I

¹ See Exhibit 1 showing Townsend Creek on the WDEQ Recreation Designated Uses Map.

² "Primary contact was also retained on low flow channels within 0.5 miles of a trailheads or a dispersed campsites [sic] located on public land and within 0.25 miles of a road." *Categorical Use Attainability Analysis*, September 2016, page 37.

visited the Frye Lake dispersed campground and found no less than eight groups camping, a Forest Service Sign, and a Forest Service maintained bathroom.³ During my forty-five-minute visit, I saw two groups of recreators splashing and swimming in a downgraded section of Townsend Creek where it enters Frye Lake. The UAA prescribed 0.5 mile buffer will easily capture the downgraded section of the stream once the dispersed campsite is assimilated into your dataset.⁴

Also, I noticed that your data set does not include a buffer around “Fremont County Youth Camp.”⁵ This camp should be protected with a buffer zone as well, either as a campsite or a school, because nearby streams are “easily accessible to small children.”⁶ For example, several church camps of all ages use the facility during the primary recreation season.

Attached are several maps and photos to support this request. Because the primary recreation season has already begun, I would appreciate a response as soon as possible, hopefully within ten days. Please contact either myself or Dan Heilig⁷ at Wyoming Outdoor Council with any follow up questions. Please also keep Dan Heilig cc'd in any of your responses.

Sincerely,



Rob Kutchin
Wyoming Outdoor Council
262 Lincoln Street
Lander, WY 82520

rob@wyomingoutdoorcouncil.org

³ See Exhibits 3-5. Photos of Frye Lake dispersed campsite.

⁴ See Exhibit 2. Topographical map with UAA prescribed 0.5 mile buffer around Frye Lake dispersed campsite.

⁵ See Exhibits 1, 2. DEQ Recreation Designated Use Map and topographical map identifying Fremont County Youth Camp.

⁶ See *Categorical Use Attainability Analysis*, September 2016, page 35.

⁷ Dan Heilig, dan@wyomingoutdoorcouncil.org, (307.332.7031 x13)

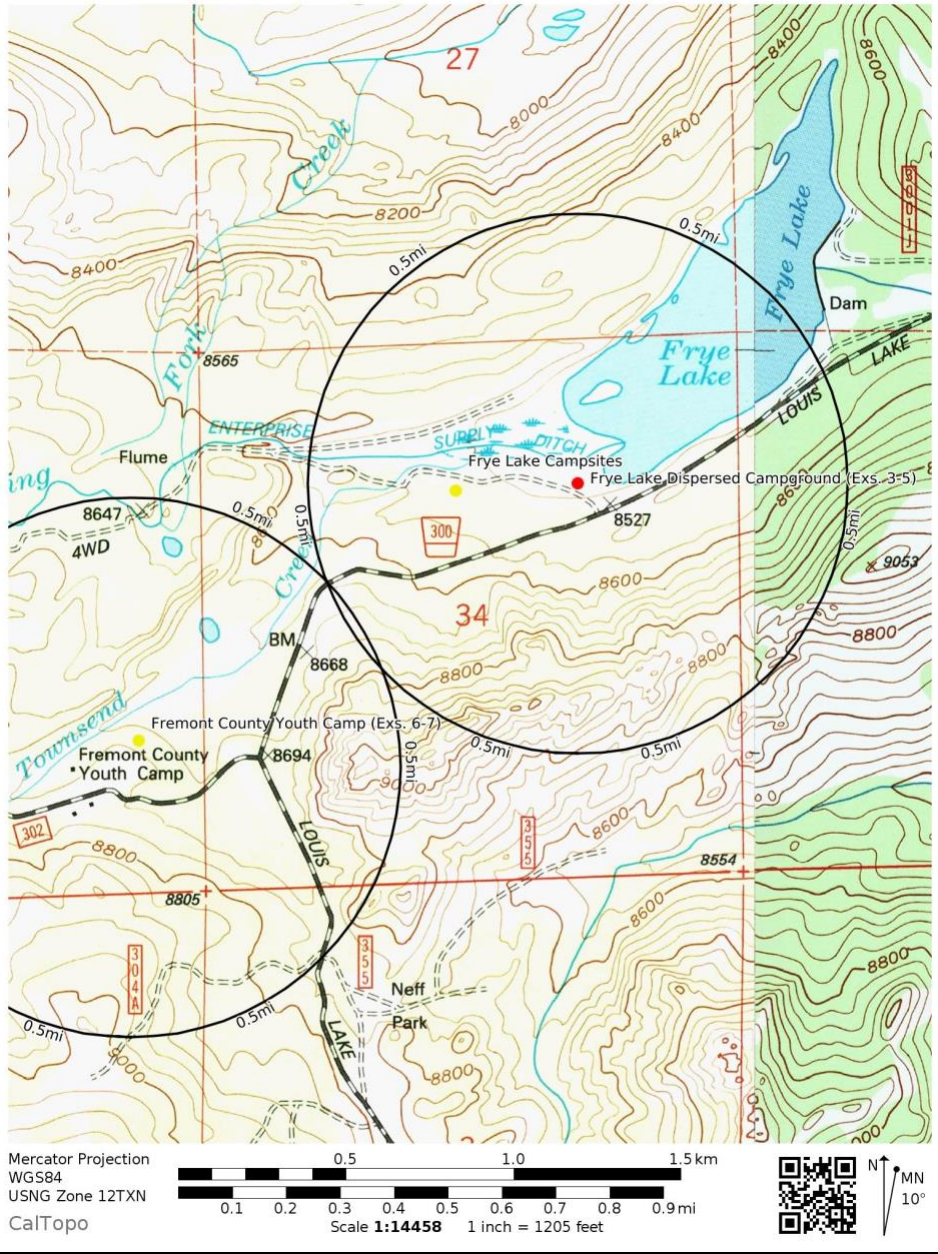
Exhibits: Wyoming Outdoor Council's June 12, 2018 Letter to WDEQ/WQD regarding a petition to upgrade Townsend Creek for primary contact recreation.

EXHIBITS

Ex. 1: Townsend Creek portion of DEQ Recreation Designated Uses Web Map. The light blue portion has been inappropriately downgraded to secondary contact recreation.



Ex. 2: Topographical map showing the appropriate buffer around Frye Lake Campground and Fremont County Youth Campground. All of Townsend Creek should be maintained as primary contact recreation because of the 0.5 mile buffers.



Ex. 3: Frye Lake dispersed campground developed by the National Forest Service in the Shoshone National Forest.

Date: June 5, 2018

Location: Frye Lake, Fremont County, Wyoming (UTM: 0673454E, 4730236N)



Ex. 4: Bathroom maintained by National Forest Service at Frye Lake dispersed campground.

Date: June 5, 2018

Location: Frye Lake, Fremont County, Wyoming (UTM: 0673454E, 4730236N)



Ex. 5: Several campers at Fry Lake dispersed campsite.

Date: June 5, 2018

Location: Frye Lake, Fremont County, Wyoming (UTM: 0673454E, 4730236N)



Ex. 6: Forest Service sign indicating existence of Fremont County Youth Camp.

Date: June 5, 2018

Location: Louis lake road. Fremont County, Wyoming (UTM: 0672525E, 4730295N)



Ex. 7: Entrance to Fremont County Youth Camp. Within 0.5 miles of Townsend Creek, but not indicated as a data point on the DEQ Recreational Water Quality Map.

Date: June 5, 2018

Location: Forest Service Road 302. Fremont County, Wyoming (UTM: 0672119E 4729266N)

