

August 19, 2024



Kathy Shreve
Department of Environmental Quality
Water Quality Division
200 West 17th Street, 4th Floor
Cheyenne, WY 82002

RE: Snake River Mobile Home Park (SRMHP; Applicant name SSDA, LLC), Permit No. WY0095320)

Dear Ms. Shreve:

On behalf of Protect Our Water Jackson Hole (POWJH), I am pleased to submit this letter in response to the Wyoming Department of Environmental Quality's (WDEQ) July 19, 2024, public notice inviting comments on the above-referenced pollution discharge permit renewal. POWJH is a locally-based nonprofit organization dedicated to serving Teton County, Wyoming, as a powerful advocate for restoring and protecting the surface waters and groundwater in Teton County, WY.

SRMHP is in the SWNE of Section 14, Township 39 North, Range 116 West, in Teton County. The point of discharge is located at Latitude 43.346550°, Longitude -110.720550°. After treatment, effluent is carried a short distance before being discharged via pipe outfall into the Snake River (class 2AB), Snake River Basin. Class 2AB uses include drinking water, game and non-game fish, fish consumption, aquatic life other than fish, recreation, agriculture, wildlife, industry, and scenic value. Water-quality-based effluent limits for this permit are based on standards intended to protect the above-listed designated uses and reflect the application of "tier 2" antidegradation protection. Additionally, the WDEQ has determined that the National Secondary Treatment Standards are appropriate for this facility.

POWJH has the following comments on the draft permit application:

- The Statement of Basis (SOB) states that: "This facility is a new discharge source to the Snake River (defined as those sewage treatment facilities constructed after July 1, 1977), therefore antidegradation is applied to all water-quality-based effluent limits applicable to this facility." The receiving waters at this facility's point of discharge are host to many recreational activities, including fishing, swimming, and rafting. Because of this human use, it would be helpful for the public to understand exactly where the point of discharge for the facility is. This would help river users avoid the undesirable prospect of full-body contact happening in close proximity to the discharge location, where significant dilution with Snake River flows has not yet occurred. POWJH suggests that WDEQ include a map and/or images that depict exactly where this discharge point is. POWJH also suggests that WDEQ work with the Teton County Health Department to place a sign on the streambank at the point of discharge to help protect against human exposure to elevated bacteria in the adjacent receiving waters.
- The SOB states that: "The monthly average limit for ammonia has been removed

because the calculated limit is higher than what is expected in raw wastewater. The permittee shall continue to report the daily maximum values.” The background in-stream ammonia data used for this draft permit is based on a dated (21 years old), brief (9 years of data) record from a location many miles upstream (USGS Gauging Station 13013650, Snake River at Moose, WY). Ammonia is both an acute and chronic toxin to aquatic life that, along with nitrate-N and warm water, help fuel nuisance/filamentous algal blooms in lotic waterbodies, which have become more frequent in the Snake River throughout Teton County, WY in late summer and fall. These algal blooms diminish the recreational quality of the Snake River by changing the aesthetics, hosting microorganisms that create “swimmer’s itch,” and altering the aquatic habitat for endemic Snake River Finespotted Cutthroat Trout. Furthermore, the Snake River a few miles downstream of the facility has been designated a National Wild and Scenic River. Despite the high dilution factor for the Snake River, it is imperative that our community mitigates harmful nutrient pollution into this nationally-recognized waterbody. Therefore, POWJH suggests that WDEQ requires SRMHP to meet the daily chronic and acute toxicity end-of-pipe limits for ammonia, as stated in the draft permit.

POWJH appreciates the opportunity to provide comments on Permit No. WY0095320 and we look forward to WDEQ’s response to our specific questions and comments.

Sincerely,



Matthew Bambach

Water Resources Program Manager