

August 19th, 2025



Justin Scott
Geology Supervisor – UIC Class I and V Programs Groundwater Section
Water Quality Division, Wyoming Department of Environmental Quality
200 West 17th Street, 2nd Floor
Cheyenne, WY 82002

Re: Comments on Draft UIC Permit No. UIC-2024-0114 v1.0 (Wilson Homestead Trust)

Dear Mr. Scott,

On behalf of Protect Our Water Jackson Hole (POWJH), we are pleased to submit the following comments on the Draft UIC Permit No. UIC-2024-0114 v1.0 for the Wilson Homestead Trust's Class V (5E3) Domestic Subsurface Fluid Distribution System.

1. Protection of Class I Groundwater

We appreciate WDEQ's recognition in Part II(A) of the permit that the Teton Creek unconfined alluvial aquifer is classified as Class I under WWQR Chapter 8, reflecting its current domestic use and high water quality. Introducing up to 2,800 gallons per day of primary-treated domestic wastewater represents a substantial and continuous load to this aquifer. Given its irreplaceable role as a high-quality drinking water source, any permitted activity must incorporate the highest level of monitoring rigor and operational safeguards to ensure absolute protection against degradation.

2. Monitoring Frequency and Seasonal Timing

The draft permit requires semi-annual sampling for key parameters (Table 3 Monitoring Schedule), to be conducted between January–June and July–December. While this meets the minimum regulatory requirement, it does not account for potential seasonal variability in wastewater quality and groundwater conditions.

In theory, the required samples could be collected in October/November and March/April—periods of low facility use—thus missing the peak summer operating season when the wedding venue is at maximum capacity, and when impacts to groundwater are most likely.

In order to get a full scope of the groundwater impacts, we encourage that WDEQ require monthly sampling to ensure representative data are collected throughout all periods of use and environmental conditions. At a minimum, one of the required semi-annual sampling events should occur between June and September to capture peak-season operating conditions. This is consistent with recommendations made for other Class V permits in Wyoming, where more frequent monitoring has been deemed necessary to protect groundwater resources.

3. Sludge Depth Monitoring

The permit (Table 3 Monitoring Schedule, footnote 5) requires visual measurement of sludge depth in the septic tanks at least annually, with pumping required when sludge exceeds 24 inches. While the table provides a definition for the measurement point, we recommend the exact reference point is more clearly specified in the main permit body, not just in a table footnote, to ensure consistent interpretation by operators and inspectors. Furthermore, we recommend semi-annual sludge depth checks for a high-use commercial system of this size to avoid potential exceedances between annual inspections.

4. Summary of Requested Changes

- Increase monitoring frequency for all parameters in Table 3 from semi-annual to monthly, and require at least one summer-season sample.
- Clarify sludge depth measurement reference point in the permit body.
- Require semi-annual sludge depth inspections for the septic tanks.

Given the high value and vulnerability of the Teton Creek Class I groundwater, these changes would provide a stronger assurance that the Wilson Homestead Trust's operations will not degrade water quality or pose a risk to public health.

Thank you for the opportunity to provide input on this important permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jennifer Evans".

Jennifer Evans
Advocacy Director
Protect Our Water Jackson Hole