

Dear James,

The *2014 Integrated Report, Chapter 5 – 303(d) Rivers and Streams* includes a number of new listings in Rich County. The new listings include North Fork of Sage Creek, Sage Creek, and Duck Creek. An unspecified cooperator established new sites and submitted their sampling data (identified as “Public data” in the report) to Utah Division of Water Quality – Division of Water Quality (UDEQ-DWQ). The collected data identifies exceedances in *E. coli* standards for the above streams. BLM has concerns about the quality of the public data being incorporated into the current Integrated Report for identifying Impaired Waters.

We understand the importance incorporating all pertinent data into the Integrated Report, but assert that analysis is only as good as the data it is based on. Below are our comments and questions for your consideration regarding the data collected by public data contributors:

- Please include the Sample Analysis Plan(s) submitted to UDEQ-DWQ that outlines adequate monitoring protocols, QA/QC methods, site locations, and other pertinent information used in sampling as described in the *2014 Integrated Report Chapter 2 – Methods*.
- Identify how UDEQ verified protocols were followed, methods were appropriate, sample locations were appropriate, and approved sampling equipment was used..
- Were sample and trip blanks taken to identify other possible sources of contamination? Were samples repeated to ensure accuracy?
- Explain how the samples were analyzed including hold times for samples.

If there is any uncertainty of the methods, data collection, analysis, or QA/QC process, we recommend the data not be incorporated into the Integrated Report. As stated in the Integrated Report, all physical, biological, and chemical water quality data has a utility, but data also has limitations. If UDEQ-DWQ does decide to include data where the quality of a cooperator’s or other water sampling partner’s data is unknown or differs in methods or QA/QC, we recommend that the data be identified so users of the report understand the differences in data collected and analysis. We recommend data and analysis to determine which waters are included on the 303(d) Impaired Status list only be of the highest caliber.

The Utah BLM/ Salt Lake Field Office and UDEQ-DWQ have a strong and mutually beneficial relationship through the cooperative water quality monitoring program. We work hard to ensure that we meet UDEQ-DWQ requirements so that data we supply is of high quality and meets the needs of both agencies’ missions. We ask that all other public data contributors sampling on public lands managed by BLM are subject to the same requirements. This is particularly important for BLM as our land management activities and obligations can be substantially affected by waters with impaired status.

Thank you for your consideration,

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