**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
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Ref: 8WD-CWQ December 18, 2020

Ms. Jodi Gardberg
Manager, Watershed Protection Section
Utah Department of Environmental Quality
195 North 1950 West
Salt Lake City, UT 84116

Subject: EPA comments on Utah Department of Environmental Quality proposed 2018 / 2020 303(d) list

Dear Ms. Gardberg:

The purpose of this letter is to provide the Environmental Protection Agency's (EPA) comments on the Utah Department of Environmental Quality (DEQ) proposed 2018 / 2020 303(d) list. UDEQ has done an excellent job in the development of the 303(d) list, and EPA appreciates the opportunity to provide comments. EPA has provided detailed comments in Attachment 1. In addition to providing comments in this letter, EPA will upload these comments via the online tool available at https://deq.utah.gov/water-quality/combined-2018-2020-integrated-report.

We look forward to receiving your final 2018 / 2020 303(d) list and continuing to collaborate with Utah DEQ. If you have any questions or would like to discuss these comments, please contact me at (303) 312-6888 or reems.shera@epa.gov. Again, thank you for you and your team's hard work on the 2018 / 2020 303(d) list.

Sincerely,

SHERA REEMS Digitally signed by SHERA REEMS Date: 2020.12.18 10:13:16 -07'00'

Shera Reems,
Monitoring and Assessment Team
Water Quality Section
Clean Water Branch
Water Division

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Attachment 1

EPA Comments on Utah's Proposed 2018 / 2020 303(d) List

Chapter 1 Assessment Methods

- Update the links to the QAPP and SOP documents on Page 20. When clicking on a few of these links, a 404 Page Not Found Error is received.

Chapter 2: Assessments Specific to Lakes, Reservoirs, and Ponds

- On May 22, 2019, EPA issued recommendations for Recreational Water Quality Criteria and Swimming Advisories for Cyanotoxins. Based on the latest scientific information, EPA has established recommended water concentrations, at or below which protects public health, for the cyanotoxins microcystins (8 micrograms per liter) and cylindrospermopsin (15 micrograms per liter).[1] The listing and assessment methodology, Table 15 lists the draft thresholds from 2016.
- DEQ identified "Lakes Tier III" as an impaired parameter for several assessment units. EPA does not consider "Lakes Tier III" as a parameter that causes impairment. EPA recommends that DEQ update all assessments with "Lakes Tier III" with an impairment parameter.

Chapter 3: Assessments Specific to Flowing Surface Waters of the State and Canals

- EPA understands that Utah uses the 30-day average to assess whether the dissolved oxygen (DO) criterion is attained. EPA encourages Utah to compare exceedances observed using the 30-day average to other DO durations (i.e., 7-day average, daily minimum) to document that this approach is the most protective.

Individual Assessment Unit Comments

EPA has identified several assessment units below where the information in the Chapter 2 and 3 Tables should be updated to reflect the same information in ATTAINS. At the same time, EPA recognizes that some discrepancies may not have been identified. EPA strongly recommends that UDEQ complete a thorough review of the draft 303(d) list (Category 5), as well as Category 4a assessment decisions to ensure that all Category 4a and Category 5 assessment decisions are accurately reflected in the Chapter 2 and 3 Tables, as well as in ATTAINS.

Weber River Watershed Management Unit

- UT16020101-014_00 (Chalk Creek3-Coalville). Non-pollutant Habitat should show Category 4C.

[1] https://www.epa.gov/newsreleases/epa-issues-recommendations-recreational-water-quality-criteria-and-swimming-advisories

- UT16020101-016_00 (Chalk Creek-4). This assessment unit shows in Category 4a for the AU / pollutant combination (Minimum Dissolved Oxygen) and shows 2020 under cycle first listed. Cycle first listed should either be removed or reflect the correct first cycle list year. Under Assessments in ATTAINS, the pollutant Total Phosphorus and Sedimentation/Siltation shows in Category 4a; however, there is no Minimum Dissolved Oxygen pollutant. UDEQ needs to ensure that ATTAINS reflects the correct pollutants and assessment categories for this assessment unit.

Upper Sevier River Watershed Management Unit

- UT16030002-004_00 (Otter Creek-2). Non-pollutant Habitat should show Category 4C.

Uinta Basin Watershed Management Unit

- UT14060005_003_00 (Ninemile Creek). This assessment unit is in Category 4a in the table and shows 2020 under cycle first listed. Cycle first listed should either be removed or reflect the correct first cycle list year. The EPA approved TMDL in ATTAINS is under Action ID 68462, *Upper Nine Mile Temperature TMDL*. Also, it appears that this assessment unit should be in the delisting table showing a delisting reason of TMDL approved (Category 4a).

Lower Colorado River Watershed Management Unit

- UT15010008-013_00 (North Fork Virgin River-2). This assessment unit (AU) is in Category 4a for the AU / pollutant combination and shows 2020 under cycle first listed for E-coli. Cycle first listed should either be removed or reflect the correct first cycle list year. The approved TMDL in ATTAINS is under Action ID R8-UT-2018-01, *Total Maximum Daily Load Assessment for E. coli, North Fork Virgin River Watershed*. Also, it appears that this assessment unit should be in the delisting table showing a delisting reason of TMDL approved (Category 4a).
- UT15010008-015_00 (North Fork Virgin River-1). This assessment unit (AU) is in Category 4a for the AU / pollutant combination and shows 2020 under cycle first listed for E-coli. Cycle first listed should either be removed or reflect the correct first cycle list year. The approved TMDL in ATTAINS is under Action ID R8-UT-2018-01 *Total Maximum Daily Load Assessment for E. coli, North Fork Virgin River Watershed*. Also, it appears that this assessment unit should be in the delisting table showing a delisting reason of TMDL approved (Category 4a).

Bear River Watershed Management Unit

- UT16010203-008_00 (Spring Creek-Hyrum). This assessment unit (AU) is in Category 4a for the AU / pollutant combination and shows 2020 under cycle first listed for E-coli. Cycle first listed should either be removed or reflect the correct first cycle list year. The approved TMDL in ATTAINS is under Action ID 4012 *Spring Creek TMDL*.
- UT UT16010202-009_00 (Spring Creek-Lewiston). This assessment unit shows in Category 4a for the AU / pollutant combination (Minimum Dissolved Oxygen) and shows 2020 under cycle first listed. Cycle first listed should either be removed or reflect the correct first cycle list year. Under Assessments in ATTAINS, the pollutant Total Phosphorus shows in Category 4a; however, there is no Minimum Dissolved Oxygen

pollutant. UDEQ needs to ensure that ATTAINS reflects the correct pollutants and assessment categories for this assessment unit.

- UT16010101-006_00 (Bear River-4). This assessment unit (AU) is in Category 4a for the AU / pollutant combination and shows 2020 under cycle first listed for Minimum Dissolved Oxygen. Cycle first listed should either be removed or reflect the correct first cycle list year. The approved TMDL in ATTAINS is under Action ID 30887 *Bear River-4 Bear River from Woodruff Creek to Utah-Wyoming Border TMDL*.