Moab Area Watershed Partnership

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To: UDWQ Care of Jodi Gardberg

Subject: 2018-2020 Integrated Report Comments from the Moab Area Watershed Partnership

Dear Jodi, Et Al,

The Moab Area Watershed Partnership (MAWP) is a diverse group of stakeholders with a focus on water quality and quantity in the greater Moab area. I had come to our attention that several assessments in the watersheds of our concern have anomalies we need to make you aware of. They are listed below by assessment unit.

First is the assessment unit Mill Creek 2: UT14030005-006_00. The assessment unit contains two very different watersheds that are not hydraulically connected in the unit. I don't believe I need to explain the rationale for separating them to your experts in assessments. I believe the partnership only needs to point out the issue. We will say these two watersheds are distinctly different which is why the lower altitude sections of these watersheds have separate assessment units. It is a mistake to assess both these watersheds in one unit.

The second assessment unit is Pack Creek: UT14030005-011_00. Your map of this assessment unit has Pack Creek listed for Max Temperature, Total Dissolved Solids, Selenium, and E. coli. However, the map fails to indicate that a TMDL has been developed for Max Temperature and Total Dissolved Solids. That document is located on your website and only states Mill Creek, Grand County in the title. However, Pack Creek is a tributary to Mill Creek and the TMDL covers both watersheds.

The third assessment unit is Castle Creek 1: UT14030005-009_00. The assessment unit is listed for E. coli and Macroinvertebrates. We are questioning the listing of non-supporting for Macroinvertebrates. The assessment methodology states it is necessary to have two samples where o/e is less than .69 in order to list a stream as non-supporting. There has only been one sample collected. I believe this was listed as non-supporting prior to your newer assessment methods and was listed when non-support for macroinvertebrates was done with only one sample. We believe at this time it shouldn't be listed at all for any data associated with macroinvertebrates because there is only one sample. We are also concerned with the RIVPACS model for this stream section. The RIVPACS model doesn't take into consideration local naturally occurring variations in streams. This stream section and assessment unit has a site specific standard of 1,800 mg/l for Total Dissolved Solids because of naturally occurring conditions. The RIVPACS model is comparing it to streams that are not as saline and therefore the observed taxa at this site is naturally different from the expected reference sites in the RIVPACS model. In the summer of 2020 we requested another macroinvertebrate sample

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collection at this site. It was sampled this fall. Hopefully this effort will lead to a greater clarity in the streams support of a macroinvertebrate community

General Comments: The MAWP was impressed with the mapping software developed for the Integrated Report. It was a much better tool to use for discerning assessments and assessment units than the previously used tables and spreadsheets. Thank you for that additional software.