SOUTHEAST UTAH HEALTH DEPARTMENT
ESTD 1972

PRICE
28 SOUTH 100 EAST
P.O. BOX 800
PRICE, UTAH 84501
T 435 637 3671
F 435 637 1933

CASTLE DALE
25 WEST MAIN
P.O. BOX 644
CASTLE DALE, UTAH 84513
T 435 381 2252
F 435 381 5635

MOAB
575 S. KANE CREEK BLVD.
MOAB, UTAH 84532
T 435 259 5602
F 435 259 7369

SEUHEALTH.COM

Assessment Team
Utah Division of Water Quality
195 N 1950 W
Salt Lake City, UT 84116

Dear Assessment Team and Jodi Gardberg:
Assessment Unit Name: Colorado River 4,
Assessment Unit ID: UT1403005-004_00
Monitoring Location ID: 4957000 and 4957997

The Southeast Utah Health Department has reviewed your 2018-2020 Draft Integrated report. We would like your assessment team to reconsider the not supporting assessment of its recreational beneficial use for the Colorado River from the confluence of the Dolores River to the Confluence of Mill Creek. Your assessment protocol states: "Until the determination of impairment and the review of additional supporting information are completed by reviewers, parameter assessments at an individual monitoring location and results from multiple monitoring locations within the same AU are not summarized and combined". We respectfully request you review the additional supporting information on this assessment.

We acknowledge that there are two samples of five in one season at one site that exceed the maximum standard for E. coli of 409 MPN. We would like you to consider the supporting information from the other site in this unit as well as the data from other years. If you look at the entire assessment unit, there are 20 samples taken from two sites during the time period used for this assessment. There are only 2 exceedances of the maximum standard which is equal to 10%, the limit for standard parameters. Other than the two samples that exceeded the maximum standard, none of the individual samples exceeded the geometric mean standard of 126 MPN. The geometric mean unit during this time period is 32.8 MPN. The geometric mean for the site that exceeded the maximum standard is 49.4 MPN and the geometric mean for the season in question if 76.4 MPN. All of these results are significantly less than your standard of 126 MPN.

Furthermore, although we realize you won't use this information according to your standard protocols, there hasn't been an exceedance of the maximum standard on this unit since 2018. We would like you to consider all this information and determine the assessment unit is supporting its recreational beneficial use.

We also understand that there is variability of E. coli in surface waters, especially streams. Your agency is aware of that variability and your protocols for resampling are a result of that variability. We consider the two samples that exceeded the maximum standard to be exceptions due to the variability in the streams and believe the preponderance of data points to a river that supports its 2A beneficial use designation.

Thank you for the opportunity to comment and the excellent work your agency performs in our area.

Sincerely,

Bradon C. Bradford, MSPH, MPA, REHS
Executive Director/Health Officer
Southeast Utah Health Department
P: (435) 637-3671

Orion Rogers, M.S., REHS
Environmental Health Director
Southeast Utah Health Department
Office: 435-259-5602
Cell: 801-557-6978