WASATCH FRONT WATER QUALITY COUNCIL

COMMENTS ON:
DRAFT 2022 INTEGRATED REPORT ON WATER QUALITY

SUBMITTED ELECTRONICALLY TO:
THE UTAH DIVISION OF WATER QUALITY

DECEMBER 3, 2021

The Wasatch Front Water Quality Council (the "Council") appreciates the opportunity to provide comment on the Draft 2022 Integrated Report on Water Quality (the "Draft IR") prepared by the Utah Department of Environmental Quality Division of Water Quality (the "Division"). The Draft IR proposes placing various segments of the Jordan River as well as Utah Lake (other than Provo Bay) into Category 5: Impaired for one or more beneficial uses by a pollutant. Among other things, the Draft IR indicates that these Assessment Units ("AUs") are impaired for agricultural use by Total Dissolved Solids ("TDS"). In turn, the Draft IR indicates that a total maximum daily load ("TMDL") for TDS is needed in these AUs. Because the development of a TMDL could affect the effluent limits imposed on entities that discharge to Utah Lake and the Jordan River, the Council provides the following comment.

By listing these AUs as impaired, the Division is setting up a process that is likely to ultimately be futile. The Draft IR demonstrates that background concentrations of TDS in Utah Lake and these segments of the Jordan River are higher than existing numeric criteria for agricultural uses. As such, developing a TMDL and associated effluent limitations for TDS is not likely to result in improved water quality or attainment of the numeric criteria. Accordingly, the Division should not require that dischargers to these AUs expend resources to reduce TDS in their effluent when doing so will not achieve the Division's water quality goals due to background water quality concentrations. Rather than developing a TMDL and resulting effluent limitations, the Council suggests that the Division should conduct a use attainability analysis to determine whether agricultural use is attainable in these AUs or should be removed as a beneficial use or whether a site specific standard should be developed.

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