



September 8, 2016

Delivered via e-mail

Attn: Mr. James Harris
Utah Department of Environmental Quality
Division of Water Quality
195 North 1950 West
Salt Lake City, UT 84114-4870

Subject: Salt Lake City Department of Public Utilities (SLCDPU) Comments on the Utah Division of Water Quality (DWQ) Utah's Draft 2016 Integrated Report, dated June 10, 2016.

Dear Mr. Harris,

Thank you for providing Salt Lake City Department of Public Utilities (SLCDPU) the opportunity to review and comment on the Draft 2016 Integrated Report (Draft 2016 IR). SLCDPU appreciates the efforts that the Utah Division of Water Quality (DWQ) has taken to prepare the Draft 2016 IR; this is an important document for Waters of the State. In addition, the SLCDPU appreciates the cooperative efforts that our two organizations have taken and will continue to take regarding water quality. The SLCDPU is an active partner with the DWQ (e.g., work groups, sampling) and wishes to continue to support the DWQ with science-based water quality and watershed management. SLCDPU supports that an adaptive management and holistic watershed approach should continue to be considered as appropriate when addressing issues related to water quality.

SLCDPU encourages the DWQ to continue to conduct research regarding HABs in Utah Lake, Farmington Bay, and other Waters of the State. The assessment methods used by DWQ are based on World Health Organization (WHO) criteria; cell counts. As evidenced by the 2016 Utah Lake HAB, cell counts as well as toxin data should be used to assess the severity of and to inform public health decisions regarding HABs. SLCDPU will continue to be an active stakeholder regarding HABs along the Wasatch Front and will assist the DWQ as possible.

SLCDPU encourages the DWQ to review data to ensure that a representative number of samples, collected within a representative time period, have been evaluated prior to assigning an impairment or TMDL. For example, *City Creek and tributaries from the filtration plant to the headwaters* is listed as impaired for dissolved cadmium. SLCDPU would like to review the data regarding this listing to ensure an adequate number of samples were collected and evaluated and that an impairment exists. SLCDPU would also consider assisting with additional sampling as possible.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jesse A. Stewart".

Jesse A. Stewart
Deputy Director
Salt Lake City Department of Public Utilities

cc: file, Laura Briefer, Rust Vetter