



State of Utah

GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Department of Agriculture and Food

LUANN ADAMS
Commissioner

SCOTT ERICSON
Deputy Commissioner

September 21, 2016

James Harris
Utah Division of Water Quality
PO Box 144870
Salt Lake City, Utah 84114-4870

Subject- Division of Water Quality 2016 Integrated Report

Dear Mr. Harris:

The Utah Department of Agriculture and Food (UDAF) appreciates the opportunity to review the 2016 Integrated Report. We recognize the tremendous effort it takes to collect and analyze the data necessary to create this report. UDAF understands the vital importance of water to the agriculture industry. UDAF has a shared interest with the Division of Water Quality (DWQ) to protect our water resources. With that shared interest, UDAF has a few concerns with the Integrated Report.

In particular, UDAF is concerned with how the report deals with the issue of sediment. DWQ removed numeric criteria for sediment in the early 2000's because it was too subjective, depending on the water body and what time of year the monitoring was done. Yet, even with the removal of the numeric criteria, DWQ continues to list water bodies as impaired for sediment. UDAF recognized that sediment is a concern. Sediment can transport nutrients, heavy metals, E.coli and other pollutants. However, there remains the question of how DWQ will use the narrative standard to list a water body. What is the process for developing a narrative standard TMDL specifically for sediment? What monitoring methods will be used? What will the monitoring plan for sediment require? These are unanswered questions that concern UDAF when discussing the implantation of TMDL for sediment based on narrative standard.

UDAF continues to be concerned with listing waters as impaired do to E.coli. We have noticed an increase in listings relating E.coli. As UDAF has stated in previous comments, the state would be better served if water bodies with high E.coli tests could first be reviewed by stakeholders before being place on the listing cycle. Engagement with communities could result in best management practices being developed and implemented without going through the costly TMDL process. This process would increase stakeholder participation while at the same time providing a savings to state resources.

UDAF continues to be concerned with the quality of the data being used for listing purposes. While we appreciate the public's participation in provided data related to water quality, all data provided to DWQ should be reviewed and verified by DWQ for accuracy. This is especially true when data is being used to determine the listing of a water body. No water body should be listed without data being verified independently by DWQ.

Again, UDAF appreciates all of the effort that has been expended in the development of this report. UDAF looks forward to continuing our partnership to protect our water resources. We hope to continue offering solutions that will help improve water quality will at the same time saving valuable state resources.

Sincerely,

A handwritten signature in blue ink that reads "LuAnn Adams". The signature is written in a cursive style with a large initial "L" and "A".

LuAnn Adams
Commissioner