



United States Department of the Interior



NATIONAL PARK SERVICE
Southeast Utah Group
Arches and Canyonlands National Parks
Hovenweep and Natural Bridges National Monuments
2282 S. West Resource Boulevard
Moab, Utah 84532-3298

IN REPLY REFER TO:
N3617 (SEUG-RSS)

August 26, 2016

Mr. Jim Harris
Water Quality Monitoring Section Manager
Utah Division of Water Quality
PO Box 144870
Salt Lake City, UT 84114-4870

Dear Mr. Harris,

Thank you for the opportunity to review and comment on the draft 2016 Integrated Report (2016 IR) on the condition of rivers, streams, lakes, and wetlands in the State of Utah. Our comments pertain to the state's proposed inclusion of waters located in Arches National Park and Canyonlands National Park on the list of waterbodies that do not meet the state's water quality standards.

1. Salt Wash, Arches National Park (Assessment Unit ID UT14030005-007). Salt Wash is proposed for listing due to high levels of total dissolved solids (TDS). We expect that high TDS levels in this stream are attributable to natural sources, given the geologic characteristics of the watershed.
2. Salt Creek, Canyonlands National Park (Assessment Unit ID UT14030005-016). Salt Creek is proposed for listing due to high selenium concentrations, evidently on the basis of previous water monitoring conducted by the National Park Service (NPS) at Little Spring in Little Spring Canyon. This canyon does drain to Salt Creek, but perennial flow extends downstream from the spring for less than 0.5 miles, and the perennial flow does not connect with Salt Creek. Only during flash-flood events (intermittent flow) does surface water from Little Spring Canyon connect with Salt Creek. For this reason, it would seem inappropriate to include Salt Creek on the state's list of impaired waters on the basis of data collected at Little Spring.

We appreciate the long history of collaboration provided by the Utah Division of Water Quality in support of NPS water monitoring. If you have an questions regarding these comments, please contact Dr. Mark Miller at 435-719-2130 or memiller@nps.gov.

Sincerely,

Kate Cannon
Superintendent

cc: Rebecca Weissinger, Ecologist, NPS Northern Colorado Plateau Network