



Ute Mountain Ute Tribe

Environmental Programs Department

P.O. Box 448

Towaoc, Colorado 81334-0448

(970) 564-5430

Bert Garcia
USEPA REGION 8
1595 Wynkoop St.
Denver, CO 80202-1129

October 8, 2015

Re: Post-Gold King Release Incident: Conceptual Monitoring Plan for Surface Water, Sediments, and Biology. Ute Mountain Ute Tribe Comments.

Dear Mr. Garcia,

Our comments and suggestions regarding the document, "Post--Gold King Release Incident: Conceptual Monitoring Plan for Surface Water, Sediments, and Biology, EPA Draft, September, 2015" which we received via electronic mail September 17, 2015 are provided in this letter.

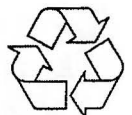
In general we find the draft plan acceptable with the addition of some minor revisions to, "Table 1, Sampling and Monitoring Schedule for Potential Sampling Sites" and an extension to the sampling duration.

The proposed monitoring location on the Ute Mountain Ute Reservation, SJ-4C does have a long-term monitoring history with period of record for water chemistry and macroinvertebrates that should be sufficient to fit into the "Objective A" category allowing for identification of potential recent changes in surface water and/or sediment quality and potential recent impacts to the macroinvertebrate community.

Past research regarding water quality in the San Juan River has shown that the highest sediment concentrations occur in the first streamflow event following a long period of no discharge (DOI, 1999), metals stored in colloidal phase of the bed load during the winter months have a high probability of being released during high volume spring runoff.

The first high discharge flows in early spring should be targeted and prioritized for analysis of total recoverable metals. We suggest the following modifications to Table 1 on page 7 of the plan:

- Add sediment for sample fraction to the Spring- June column addition to the analytes listed under "Water Column" and;
- Revise to "May/June" for the Spring season





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Duration:

Although the draft plan states that monitoring efforts may be extended beyond one year duration following the evaluation of one year of results we feel strongly that at least two years is needed as a baseline for evaluation, especially considering the variability and challenges with storm water flows and sampling.

At a minimum, the storm water component needs to be done for multiple years, three to five would be more realistic to meet the need of establishing an informative data sets of post-Gold King results for evaluation.

Our final suggestion would be to incorporate data from San Juan Recovery Implementation Program into water column, sediment and biota monitoring for San Juan River, available at:

http://www.fws.gov/southwest/sjrip/DR_WQC.cfm

Reference: U.S. Department of the Interior. 1999. "Quality of Water Colorado River Basin, Progress Report No.19." U.S. Bureau of Reclamation.

Thank you for your time and consideration. Please contact us anytime with questions or requests for additional information and send the revised/final monitoring plan to our attention when it is available.

Sincerely,

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