

**Comments of  
Great Salt Lake Brine Shrimp Cooperative, Inc.  
On**

**“UTAH’S DRAFT 2016 INTEGRATED REPORT”**

**September 08, 2016**

*Submitted by Thomas Bosteels*

*To Utah Division of Water Quality, 195 North 1950 West, Salt Lake City, Utah 84114-4870*

*Attention James Harris*

We support and agree with the Division of Water Quality’s (DWQ) recognition of the unique character of Great Salt Lake (GSL) and the fact that the hypersaline condition of GSL causes significant differences in nutrient dynamics, uptake, assimilation and other biological responses to nutrients than are observed for fresh water, marine, or even other saline lakes.

We further support the Divisions position that 303(d) assessment be deferred for two years with regard to GSL until further scientific information can be collected and evaluated.

Below we highlight some concerns and recommendations for the 2016 integrated report.

**Opportunity for public comments on assessment methods for GSL:**

We want to ensure that, as assessment methods are developed for GSL, we be kept informed and notified and that the opportunity be available for public comment before implementation of assessment methods.

**Risk associated with the five (5) distinct subclasses (5A-5E) of GSL:**

We strongly support that GSL be assigned its own designated use class (Chapter 2 page 72). We further understand that DWQ divides GSL into 5 subclasses (5A-5E) as a result of the embayments and unique characteristics of the sub classes. However, the integrated report fails to emphasize the importance of the interconnections of the various bays of GSL. Treating sub classes of GSL independently of each other is likely to result in severe consequences to the biological integrity of GSL as a whole. We believe that specific assessment methods being developed for GSL need to take into consideration the interconnections of the various bays of GSL and the influences these connections have on biotic responses.