

August 19, 2008

VIA E-MAIL

WMoellmer@utah.gov

Dr. William Moellmer
Utah Division of Water Quality
Environmental Quality
Water Quality
CANNON HEALTH BLDG
288 N 1460 W
SALT LAKE CITY UT 84116-3231

Re: Proposed Water Quality Standards - Comments on R317-2

Dear Dr. Moellmer:

The Utah Farm Bureau Federation, hereafter referred to as UFBF, has reviewed the July 15, 2008 rulemaking revisions to the water quality standards and submits the following comments.

UFBF fully supports the proposed site-specific selenium standard for the Gilbert Bay region of Great Salt Lake (12.5 mg/kg in bird eggs). The standard was proposed as a result of a well-documented, science-based process that relied on multiple layers of conservative assumptions aimed at ensuring ongoing protection of the beneficial uses of the Great Salt Lake.

UFBF recommends that the selenium standard be adopted **without** the referenced footnote 14 (Table 2.14.2), i.e., the implementation methodology. UFBF understands that the methodology was developed by Division of Water Quality staff approximately one week before the end of the nearly four year standard development process and has not been subject to public scrutiny and comment.

Utah Farm Bureau objects to the methodology in that it proposes an arbitrary, potentially ineffective approach to management of the lake. Moreover, it was proposed without any substantive explanation from the Division of Water Quality and is inconsistent with other programs administered by the Division of Water Quality. UFBF believes the Division of Water Quality already has the necessary tools to monitor, assess and respond to water quality issues across the State without creating supplemental, arbitrary requirements.

In summary, UFBF commends the Division of Water Quality on its science-based approach

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to promulgating numeric water quality standards for Great Salt Lake. UFBF urges the Board to adopt the referenced selenium standard **without** an implementation methodology that is potentially inconsistent with Utah law and that can be developed in a more rigorous and effective way.

Regards,

Todd R. Bingham



V. P. Public Policy
Utah Farm Bureau Federation

Cc: Randy Parker, Utah Farm Bureau Federation
Leland Hogan, Utah Farm Bureau Federation
Mark Peterson, Utah Farm Bureau Federation