

| NAME | DATE |
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| Jeff Salt | July 16, 2012 |
| AGENCY, ORGANIZATION OR BUSINESS | ADDRESS, CITY, STATE, ZIP |
| Great Salt Lakekeeper | P.O. Box 522220 Salt Lake City, UT 84152 |
| E-MAIL ADDRESS | PHONE NUMBER |
| jeffsalt@greatsaltlakekeeper.org | 801-485-2550 |
| OVERALL OPINION OF UDWQ'S GREAT SALT LAKE WATER QUALITY STRATEGY | |
| STRENGTHS | WEAKNESSES |
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| 1 | 2 | 23 | The Division's goal should be to provide long-term and short-term or instantaneous protection of the beneficial uses (to provide protection from pollution instances or occurrences, and provide long-term guarantees for the beneficial uses). |
| 1 | 2 | 34, 35 | Or provide protection from pollution incidents or determination if a violation has occurred, or how to determine compensation for violations. |
| 1 | 2 | 43 – 45 | The Division is also responsible to protect water quality of Great Salt Lake as a delegated responsibility on behalf of the Division of Forestry, Fire and State Lands, who manages Great Salt Lake as a public trust resource. FFSL also has administrative rules that should be cited in this section, and throughout the various documents for the plan. This is important, because FFSL also manages the bed of Great Salt Lake, which contains and sequesters pollutants and contaminants that interact with the water column and affect overall water quality. FFSL also has a mandate to protect public access and various uses. The public trust doctrine should be discussed more thoroughly in this section and throughout the plan. |
| 1 | 2 | 49 – 55 | Protection of primary and secondary contact recreation uses should also extend to all of Gilbert Bay, as many boaters swim in the open waters of Gilbert Bay, and many tourists believe they can swim at Saltaire and Black Rock. Arguably, these beneficial uses should also be extended to include Farmington Bay as many people who boat within the bay at Antelope Island think they can also swim. |
| 1 | 2 – 7 | 21 – 184 | The Plan should discuss numeric criteria and numeric standards separately, and have as one of the goals of the plan establishment of both numeric criteria and numeric standards. The draft plan uses the term numeric criteria too loosely, and should be specific and clear in its use of term, and not use the terms interchangeably. |
| 1 | 8 | 196 – 208 | Recreational beneficial uses should be protected for all parts of Great Salt Lake. For example, primary contact and swimming should not be protected only at Antelope Island. |

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| 1 | All | All | Generally, salinity should not be the only primary condition for evaluating pollutants, or the effects of pollutants or for establishing numeric criteria or standards. Much of Great Salt Lake's chemistry and chemical interactions is dependant on factors or conditions such as loading from all discharges and sources within the watershed, legacy contaminants and pollutants, and nonpolluting chemicals, such as sulfur. Also, physical conditions, such as lake level or wind play an important role in influencing how chemicals react or are transported. Other conditions and factors should be given equal importance to salinity in establishing numeric criteria and standards. |
| 1 | All | All | Generally, since Great Salt Lake is terminal, loading from other watershed sources should be considered in determining numeric criteria and standards and antidegradation limits. |
| 1 | All | All | Generally, an adaptive process seems logical and the best approach. |
| 1 | All | All | Generally, emerging pollutants of concern should also be included in the plan for establishing numeric criteria and standards. Emerging pollutants of concern should not be relegated to the back burner and dealt with years from now in a sequential manner after priority pollutants. |
| 1 | All | All | Generally, numeric criteria and standards for nutrients should be addressed early in the process, and not relegated to the back burner and dealt with in a sequential manner after priority pollutants. |
| 1 | 19 | 470 – 475 | Delayed implementation of 6 months may be arbitrary. The time for implementation may vary widely, depending on the data collected and the known threat to beneficial uses. Some criteria and standards may require immediate implementation, while others could be scheduled further out than 6 months without harm to beneficial uses. |

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| 1 | All | All | Generally, the Plan should take into account the modifications to the lake environment caused by legacy activities and discharge permits that has been previously approved before appropriate criteria and standards could be established. In other words, the polluted and degraded state of the lake should not a given or be used as the starting point from which to set criteria and standards. |
| 1 | 21 | 478 – 504 | Bird-based criteria and standards should be used if they are the most sensitive species. Behavior affected by pollution should also be used as benchmark, if physical tolerance does not establish a low enough threshold. If nesting behavior or migration patterns are affected by pollutants, but the bird can tolerate the toxicity without dying, then those behavior impacts should be used as benchmark to set the criteria or standard. |
| 1 | 21 – 23 | 505 – 544 | Water based criteria and standards should also reflect interactions of pollutants with nonpollutants, and how different concentrations of nonpollutants may affect cycling, fate, transport, toxicity of pollutants. |
| 1 | 23 | 554 – 561 | Disagree with priority of aquatic criteria over recreational criteria. Priority for recreational criteria should be given equal status for those areas of Great Salt Lake where recreational use is anticipated, existing, or has near-term potential. Those areas that have less likelihood for recreational uses can be given lower priority and dealt with at the appropriate time. Places like Antelope Island and Saltaire should be given high priority. |
| 1 | 25 | 618 – 631 | Loading should also be analyzed from sources throughout the GSL watershed, not just from sources that discharge directly into the lake. In effect, there should be a grand TMDL for the GSL watershed, using the loading from the lake as the starting point for determining limits for permits throughout the watershed. |
| 1 | 27 | 665 | Text for line 665, item #3 in list seems to be cut off, and the rest of the text is missing. |

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| 1 | 27 – 28 | 693 – 705 | Mixing zones should be eliminated from GSL. |
| 1 | 28 | 706 – 724 | Antidegradation should be applied to all permits within the GSL watershed, since all sources contribute to the lake's loading. |
| 1 | 29 – 30 | 733 – 755 | A specific WQ workgroup for GSL should be established to guide and help with establishment of numeric criteria and standards. The existing WQ Workgroup would not be appropriate, as several members of that groups are not concerned about GSL issues. |
| 1 | 30 - 31 | 756 – 787 | The proposed schedule is far to long. The schedule needs to be shortened to ensure that current beneficial uses are protected as soon as possible. The proposed schedule demonstrates only mild commitment by the Division to this plan. |

