

Bill M.

CENTRAL DAVIS SEWER DISTRICT



DWQ-2008-001369

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August 20, 2008

Walt Baker, Executive Director
Division of Water Quality
P.O. Box 144870
Salt Lake City, Utah 84114-4870

RECEIVED
AUG 20 2008
DIVISION OF
WATER QUALITY

Re: Comments on Proposed Changes to R317-2

Dear Mr. Baker:

The following comments are offered in support of proposed rule making currently out for public comment. I have two specific issues I would like to address. A separate letter has been sent by our District which contains further comments which I also support.

Segmentation of the Great Salt Lake

I strongly support the segmentation of the Great Salt Lake into the five classes presented in the draft rule. I am sure that you are aware that the inter-island dikes that segment the lake were constructed well before the November 28, 1975 date specified in the Clean Water Act in 40CFR Part 131.3(e) as the definition of an existing use. Since the dikes have been in place since that date, the appropriate existing uses should be based on the existing lake segments. As such, any designated uses should also be established with the segmentation in place. Hence, we support standard being developed for each segment as deemed appropriate by adequate research.

Deleting Primary Contact Recreation from Farmington Bay

I support the change in beneficial use of Farmington Bay from primary contact recreation to secondary contact recreation. Central Davis Sewer District staff has spent many hours on Farmington Bay involved in research the past several years. It is apparent to us that a primary contact classification with full body immersion is not only unrealistic, but

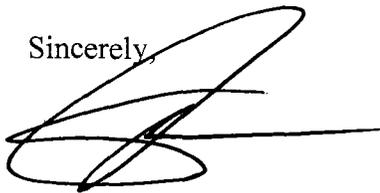
2200 South Sunset Drive, Kaysville, UT 84037

Office: (801) 451-2190 Fax: (801) 451-6836 Web: cdsewer.org

impossible in much of the Bay. As you aware, we, in conjunction with your office sponsored several studies relating to the Bay open water and wetlands. One of these studies conducted by Wayne Wurtsbaugh from Utah State University gave preliminary indication that cyanotoxins in Farmington Bay were quite high. Values reported in his study were well in excess of the World Health Organization (WHO) recommended guidelines. Because of these alarming values, our staff questioned the results. From this questioning, we determined that sampling methods employed may have biased the results high. For this reason, the District commissioned a study of Farmington Bay for cyanotoxins through Ramesh Goel at the University of Utah. This study is still ongoing for year two of the sampling. The results of the first year have been published and have been made available to your staff and are also on our website. The results of this testing shows low or no cyanotoxins present in the Bay. Current year testing is consistent with these results. As such, it appears the water column value is well below the 20 microgram per liter guideline set by the WHO for recreational contact and most likely also below the 1 microgram per liter guideline for drinking water. As a side note, the WHO standard is extremely conservative and is based on a safety factor of 1,000 over established test results for an observed impact. The recreational standard is based on the consumption of 100 ml of water daily while swimming in the affected water body. If someone could swim in Farmington Bay it is highly unlikely they would be swimming daily or would swallow 100 ml of water each swim. Based on the information available, the determination that Farmington Bay should be protected for secondary contact only is reasonable. I encourage all involved to accept the UAA prepared by staff and approve the revised beneficial use.

Thank you for your time and consideration of these issues. We will continue to support the application of good science in the establishment of site specific standards for Farmington Bay and the rest of the Great Salt Lake.

Sincerely,

A handwritten signature in black ink, appearing to read 'Susan Holmes', with a long horizontal line extending to the right.

Susan Holmes
Chair, Central Davis Sewer District