



G R E A T S A L T L A K E A L L I A N C E

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DWQ-2014-001548

William Damery
Utah Division of Water Quality
195 North 1950 West
PO Box 144870 Salt Lake City, Utah 84114-4870

RE: 401 Certification of UP Causeway East Culvert Closure

Dear Mr. Damery,

The Great Salt Lake Alliance is composed of leaders of conservation groups with a major focus on Great Salt Lake (GSL). We have been in existence since 1998. We share a common concern for the long-term health and protection of GSL.

Our comments focus on the proposed 401 Certification to close the East Culvert of the Union Pacific Causeway.

Our Concerns;

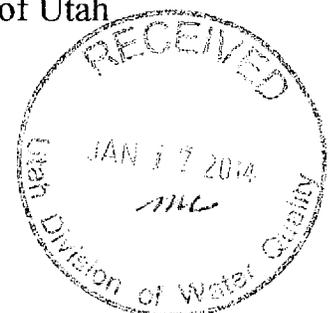
We believe the salt and water balance and the water quality of GSL are two of the most important ecologic factors impacting GSL health and integrity.

The compartmentalization of GSL by the UP Railroad Causeway has resulted in a hyper-saline North Arm and a South Arm significantly dependent on North to South flow of concentrated brine across the Causeway. The deep brine layer created by this flow now underlies much of the South Arm and is the source and location of major concentrated toxic methyl mercury in GSL. Flow of concentrated brine across the Causeway is dependent on Lake level, permeability of the Causeway, and flow through culverts and the Breech.

The integrity of GSL is at risk and is being made worse by Union Pacific which has for years delayed fulfilling its responsibilities to the State of Utah and the Corps of Engineers.

Our Suggestions;

Use this bad situation to require UPRR to correct the damage.



Limit the time of 'temporary' flow reduction from the North Arm and use this time to understand the permeability of the causeway and monitor impacts.

Require a new and updated Salt and Water Balance Model for GSL as part of the Certification process.

Put a time limit on new bridge construction on the Causeway.

The economic value of GSL is dependent on healthy ecologic systems.

Sincerely,

A handwritten signature in cursive script, appearing to read "Maunsel B. Pearce".

Maunsel B. Pearce
Great Salt Lake Alliance