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DIVISION OF
WATER QUALITY

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August 7, 2008

William Moellmer
Utah Division of Water Quality
P.O. Box 144870
Salt Lake City, Utah 84114-4870

Dear Mr. Moellmer,

We have recently discussed with our principal water wholesale source, the Jordan Valley Water Conservancy District, the proposed Amendments to the Standards of Quality for Waters of the State, proposed for Rule R317-2 of the Utah Administrative Code, dealing with Great Salt Lake Selenium Standards. We support the following conclusions expressed by JVVCD in those discussions:

"We note that the proposed selenium water quality standard consists of two components. The first component is a tissue-based standard of 12.5 mg/kg dry weight, using bird eggs. We agree with this proposed standard, and appreciate the extensive studies that have been performed over the previous four years to arrive at this number.

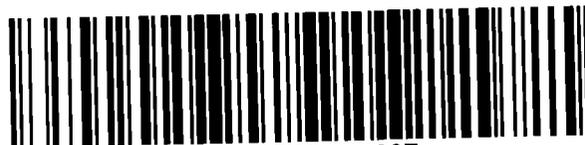
We also agree with the second component, that of establishing assessment procedures for Gilbert Bay waters which would allow for monitoring and taking increased actions if selenium concentrations are found to increase toward the standard in future years. However, we disagree with the proposal to place caps on selenium loading in Great Salt Lake discharge permits at 60 percent of the proposed standard level. We see this as a de facto selenium standard placed at 60 percent of the number derived through appropriate scientific studies."

Along with JVVCD, we request that the implementation of annual selenium loading caps at levels below the selenium standard not be included within the proposed assessment procedures.

Thank you for this opportunity to comment on important water quality issues.

Sincerely,


Gary Luebbers, City Manager
City of West Jordan



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