



State of Utah

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Environmental Quality

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DIVISION OF WATER QUALITY  
Walter L. Baker, P.E.  
Director

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MAY 09 2014

Mr. Mark McCune  
Union Pacific Railroad  
1400 Douglas Street, Stop 0910  
Omaha, NB 68179-0719

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DWQ-2014-006641

Subject: Level II Antidegradation Review Comments  
Temporary East Culvert Causeway Closure, Great Salt Lake

Dear Mr. McCune:

The purpose of this letter is to provide our review comments on the Level II Antidegradation Review (ADR) that was received via e-mail on April 4, 2014, DWQ-2014-005439. We have completed our review and have the following comments that need to be addressed in order for us to approve the ADR for public notice.

The Level II ADR submitted used DWQ's ADR Level II Application Form which will be confusing for most people. As we have previously suggested, this form was developed specifically for discharge permitting purposes and not 401 Water Quality Certifications. For your resubmittal, please extract the information that was provided in the form into a document, i.e., don't use an incorrect form. DWQ does not currently have a form for 401 Water Quality Certifications.

Following are comments regarding specific sections of the ADR:

1. No parameters of concern (POC) were identified. At least one POC is needed to form the basis for the alternatives analysis and to determine the least degrading, feasible alternative. The POC(s) are any parameters that have the potential to be degraded by the modification of the flow circulation between Gilbert and Gunnison Bays resulting from the closure of the East culvert.

The water quality parameters included in the Interim Monitoring Plan should be the list of potential POCs, with each parameter either included as a POC, or justification provided as to why it is not a POC, i.e., has no potential to be degraded.

The USGS Water and Salt Balance Model of Great Salt Lake has been accepted for use in determining the permanent mitigation for the East culvert closure. Therefore, for the purposes of the alternatives analysis, it is acceptable to use salt load or salinity as a

surrogate for the POCs identified.

2. Although it appears that the pumping alternative is highly impractical, the infeasibility of the alternative could use further substantiation by specifying the pump size required and order-of-magnitude cost estimate.
3. The alternatives analysis does not address the alternative to modify the existing Rambo Bridge geometry, either through construction of a berm or trench, as proposed in the Interim Mitigation Plan. This alternative should be evaluated as part of the alternatives analysis.

If you have any questions, please contact Nick von Stackelberg at [nvonstackelberg@utah.gov](mailto:nvonstackelberg@utah.gov) or by phone at (801) 536-4374.

Sincerely,



Walter L. Baker, P.E.  
Director

WLB:NvS