APPENDIX H—RESPONSIVENESS SUMMARY

Salt Lake County would like to thank everyone who submitted comments on the Draft WaQSP. Input from the community as well as regulators, is an important component of a successful plan. The following table presents a summary of each comment and specific responses. We hope this satisfactorily addresses the concerns/suggestions submitted, and we appreciate the time individuals spent on reviewing the draft document.

WaQSP RESPONSIVENESS SUMMARY

LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
1	1	Economics	Legal authority for County and local government to impose a tax is based on State statute. SLCo does not have the legal authority to impose a sales tax on water sales to fund the WaQSP. The only resource is an attempt to get the Utah Legislature to pass a bill which would permit a local government to impose a tax or fee to support programs to preserve water quality.	Any sales tax or new funding mechanism proposed by this study would be evaluated by the County District Attorney. Should the County wish to pursue new funding, appropriate legal authority would be necessary.
2	2	Watershed Planning Elements	In description of authorities & jurisdictions, the Division of Forestry, Fire, & State Lands was left out, which actually owns and manages the bed of the Jordan River. These rights are granted under Section 65A Utah Code and defines in Administrative Rule R652-2-200. Would like language inserted to assert the State's rights and obligations.	Agreed, change was incorporated.
3	3	Utah Lake	WaQSP needs to FORMALLY cooperate with the June Sucker Recovery Implementation Program (JSRIP). JSRIP's goals are almost entirely consistent with WaQSP but it may be necessary to alter flows in the Jordan to enhance habitat recovery in the lake from time to time. Two most likely future projects to accomplish this goal would be the removal of vast numbers of common carp and the utilization of any opportunities to reduce the current radical lake level fluctuations. County could send a representative to the JSRIP's Technical Committee meetings and needs to meet with the RIP's Program Director's office soon to discuss how the relationship with WaQSP might be.	Thank you, comment noted. The County is interested in cooperating with this program as a stakeholder.
4	4	Implementation/ Jordan River	Jordan River delisted as quickly as possible, swimmable and fishable by 2015, specific deadlines and water quality targets.	The goals and objectives including strategic targets for this WaQSP are identified in Chapter 2. The first goal is to "Provide for high quality waters that support the nationwide goals of "fishable" and "swimmable"". Future updates of the WaQSP may set delisting as a goal, recognizing that this is a State determination and is based on the designated beneficial use of the waterbody. The Jordan River is currently protected for secondary contact recreation, such as boating and wading. Future updates of the WaQSP may include deadlines and water quality targets, if the County elects to hold to higher standards than set by the State of Utah.
4	5	Stormwater	Stricter stormwater discharge permits.	Industrial and municipal stormwater discharge permits are issued by the State of Utah DWQ. The County currently conducts stormwater sampling in accordance with their permit. This monitoring is intended to characterize and identify trends. In addition, the County implements Best Management Practices that serve to minimize stormwater pollution. The County will continue to investigate measures to address pollutants in stormwater runoff. The County is currently not pursuing enforcing stormwater standards that are stricter than the State of Utah.
4	6	Nonpoint	Mitigate trash and nonpoint source pollution like golf courses. Clean up tributaries, including fecal coliform coming from Immigration Canyon.	The County currently has a maintenance program to remove trash and debris from flood control facilities. Please see pages 4-7-59 and 4-7-68 which address the trash issue. In addition, a subsection on trash and debris has been added to Section 4.3. The State of Utah has a non-point source plan which addresses 9 categories of regulated non-point sources. Golf courses are addressed in Section 4.4.6. The State DWQ is currently evaluating sources of coliform in Emigration Canyon. A plan to meet water quality standards will be prepared as part of the TMDL process.
4	7	Point Sources/ Wastewater	Stricter wastewater treatment discharge permits.	Wastewater treatment plant discharge permits (UPDES permits) are issued by the Utah Division of Water Quality. These permits are technology based (pollutant limits can be met using conventional technology) except in cases where water quality standards are not being met ("non attainment" listings). In these cases, an evaluation of all pollutant sources is conducted (a TMDL study) and a plan is developed to enable water quality standards to be met, stricter permit requirements can be applied to treatment facilities. Where a receiving water is meeting its beneficial use based water quality criteria, stricter discharge permits are not required.
5	8	Implementation/Jordan River	Make the Jordan River fishable, swimmable and healthy for wildlife by 2015.	See response to Comment #4.
6	9	Implementation/ Jordan River	WaQSP include specific deadlines and water quality targets to achieve a healthy "swimmable" river by 2015.	See response to Comment #4.

WaQSP RESPONSIVENESS SUMMARY

LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
7	10	Implementation/ Jordan River	Attainable goal set of improving water quality so it meets full body contact quality by the year 2014.	The beneficial use designation is determined by the DWQ. The Jordan River is currently protected for secondary contact recreation. This designation must be changed by DWQ to be protected for primary contact recreation.
7	11	Stormwater, Nonpoint	Wants to ensure WaQSP address both stormwater nonpoint sources.	Please note Sections 4.3 and 4.4.
8	12	Implementation/ Jordan River	Strongly support the current effort to improve the plans for the future of the Jordan River Corridor. Would like sufficient goals and proceed with an aggressive clean-up action plan on Jordan River.	Thank you for the comment. While the Jordan River is a major component of the wastershed plan, it is only one sub-watershed. Consequently, recommendations that will move forward during this cycle will include other sub-watersheds. Furthermore, there are additional efforts on the Jordan River, as discussed in Chapter 1, Section 1.8.
9	13	Implementation/ Jordan River	Accountability with measurable targets & verification. Jordan River delisted as an impaired waterway within 10 years or less.	The goals and objectives including, strategic targets for this WaQSP, are identified in Chapter 2. The EHI and SFI are intended to serve as a measuring tool for progress in improving watershed health. The goal is to improve sub-watershed scores through plan implementation. Future updates of the WaQSP may set delisting as a goal, recognizing that this is a State determination.
9	14	Preservation/ Restoration	Corridor preservation and restoration with widening and multi-channeling of the stream bed.	One of the strategic functions identified in Chapter 2, Section 2.2 is to, "Increase stream corridor and watershed recharge area preservation to improve habitat, social, recreational and water use functions". Should it be determined through project development that widening and multi-channeling is necessary, it will be incorporated into the design plans.
9	15	Point Sources/ Wastewater	More emphasis on better water discharge quality over time through the permit issuing process. Use discharge water as gray water for irrigation.	See response to Comment #7. Secondary irrigation water is discussed in Sections 4.2.4.3, 4.2.5.7 and 4.2.5.8.
9	16	Stormwater	Use methods from cities such as Denver, Reno, Boise, Houston, San Antonio for the storm water system in the Salt Lake Valley.	Methods from these Cities and others are and will be used in development and redevelopment of the stormwater system in the County.
10	17	Implementation/ Jordan River	Accountability with measurable targets & verification. Jordan River delisted as an impaired waterway within 10 years or less.	See response to Comment #4.
10	18	Preservation/ Restoration	Corridor preservation and restoration with setbacks for development. City and County ordinances that establish a minimum setback of 200-300 feet or to the outermost edge of the 100-year flood plain.	Chapter 6 - Implementation includes methods for preservation and restoration of the watershed. Ordinances designed to protect watershed resources are critical components to any watershed plan. Such ordinances include encouragement of low impact development, limiting impervious surfaces on new developments, and establishing minimum setbacks from waterways. The Foothills and Canyons Overly Zone ordinance requires a 100-foot setback. Salt Lake City is also reviewing a similar setback requirement. The establishment of these setbacks must consider the protection of the riparian corridor as well as the urban nature of this watershed.
10	19	Point Sources/ Wastewater	Stricter permits to work towards delisting the Jordan River as an impaired waterway. Sewer Emigration Canyon.	See response to Comment #7. The TMDL process is underway for Emigration Creek. One of the possible recommendations from the study could be sewering the Canyon with treatment at Salt Lake City, a small canyon facility, or a combination such as a scalping plant (see Sections 4.2.4.4 and 4.2.4.5).
10	20	Stormwater	Stricter NPDES permits with specific targets. Stormwater should be treated or diverted as opposed to discharging into the Jordan River.	The State of Utah DWQ has primacy over NPDES permits, including stormwater discharge permits. The County currently implements stormwater Best Management Practices with the intent of minimizing stormwater pollution. This includes catch basins and detention basins that serve to capture a portion of sediment in stormwater runoff.
10	21	Instream Flows	Reallocation of water rights to ensure that there is sufficient water where it's needed most.	Comment noted. Instream Flows Planning Element recommends strategies for ensuring sufficient flows for aquatic resources.
10	22	Nonpoint	Management plans & discharge permits for golf courses. Trash & recycling receptacles along Jordan River and also phase out of petroleum plastics with bioplatics [sic].	Discharge permits for golf courses are not required by the State. See response to Comment #6 for NPS management. Trash and recycling receptacles along the Jordan River are the responsibility of the individual municipality. Phasing out petroleum plastics with bioplastics is beyond the scope of WaQSP.
11	23	Implementation/ Jordan River	Strict and measurable targets to delist the Jordan River by 2015.	The goals and objectives including strategic targets for this WaQSP are identified in Chapter 2. Future updates of the WaQSP may set delisting as a goal, recognizing that this is a State determination.

WaQSP RESPONSIVENESS SUMMARY

LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
11	24	Preservation/ Restoration	Corridor preservation and restoration with setbacks for development. City and county ordinances that establish a minimum setback of 200-300 feet, or to the outermost edge of the 100-year flood plain.	Chapter 6 - Implementation includes methods for preservation and restoration of the watershed. Ordinances designed to protect watershed resources are critical components to any watershed plan. Such ordinances include encouragement of low impact development, limiting impervious surfaces on new developments, and establishing minimum setbacks from waterways. The Foothills and Canyons Overly Zone ordinance requires a 100-foot setback. Salt Lake City is also reviewing a similar setback requirement. The establishment of these setbacks must consider the protection of the riparian corridor as well as the urban nature of this watershed.
11	25	Point Sources/ Wastewater	Stricter permits to work towards delisting the Jordan River as an impaired waterway. Sewer Emigration Canyon.	See response to Comment #19.
11	26	Stormwater	Stricter NPDES permits with specific targets and specify pollutant levels. Stormwater should be treated or diverted as opposed to discharging into the Jordan River.	The State of Utah DWQ has primacy over NPDES permits, including stormwater discharge permits. The County currently implements stormwater Best Management Practices with the intent of minimizing stormwater pollution. This includes catch basins and detention basins that serve to capture a portion of sediment in stormwater runoff.
11	27	Nonpoint	Management plans & discharge permits for golf courses. Trash & recycling receptacles along Jordan River and also phase out of petroleum plastics with	See responses to Comments #6 and 22.
12	28	Preservation/ Restoration	Enjoys the area's bike/jogging pathways and hopes more can continue to be done including purchase of open lands, zoning ordinances, and environmental easements.	The importance of recreational opportunities in this watershed is recognized, and is also an important component of WaQSP implementation. These suggestions are discussed in Chapter
13	29		See comments from Friends of the Jordan River	Please see responses above.
14	30	Implementation/ Jordan River	Specific timeline to delist Jordan River by 2015 and beneficial use of the Jordan River changed to level one contact	See response to Comment #4.
14	31	Instream Flows	Build some new oxbows and increase water into the river at 2100 S. then send it back through a man-made creak along the 900 S. bike path.	WaQSP does not recommend specific projects in specific locations; however, generally supportive of restoration of old oxbows for habitat creation. Instream Flows Planning Element recommends managing water flow to the Jordan River at 2100 S to more closely resemble a natural flow regime.
15	32	Instream Flows	WaQSP notes water from Wasatch Front streams in the Bell Canyon area are treated by the District and distributed for potable uses and the draft was lacking hydraulic information.	Comment noted.
16	33	Instream Flows	Instream flow planning element must consider approaches that are consistent and sensitive to existing water users. Water diversion and use must be in accordance with well-established legal systems and it will be necessary to acquire existing water rights and file change applications. The Utah Division of Water Rights has a program to increase & improve flow monitoring and the data is available with real-time monitoring (page F-24)	Agreed. Recommended strategies for increasing instream flows fall within existing water rights law.
16	34	Utah Lake	Kennecott mining and land development are dependent on uninterrupted flow with predictable water quality. Any water right changes to Utah Lake occur with sensitivity to existing rights and State Law.	Acknowledged.
16	35	Instream Flows	The WaQSP improperly describes the Oquirrh Mountains as generally not benefiting from lake effect storms, however, many lake effect precipitation events favor the Oquirrh Mountains (page 4-6-38).	Thank you, comment was incorporated.
16	36	Instream Flows	Reference to Bingham Tunnel should be removed and Kennecott should be identified as the owner/operator of the treatment plant (page 4-6-42).	Thank you, comment was incorporated.
16	37	Instream Flows	Kennecott no longer leaches (page 4-6-42 5th paragraph). Should read, "Surface and shallow subsurface water that would drain to Butterfield Creek is collected by a cutoff wall system that surrounds the exterior base of the mine. The water is conveyed into Kennecott's operations water system."	Thank you, comment was incorporated.
16	38	Instream Flows/ Utah Lake	Utah Lake and Jordan River are also managed for industrial use (pages 4-6-44, 4-8-1).	Thank you, comment was incorporated.

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LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
16	39	Instream Flows	Lee Creek flow was diverted back to original stream in 1998. Kersey Creek flows into Lee Creek prior to entering the Inland Sea Shorebird Reserve near the Great Salt Lake. USGS installed a flow meter on the outflow of the Inland Sea Shorebird Reserve and has been collecting measurements since 2006 (page 4-6-49).	Thank you, comment was incorporated.
16	40	Headwaters	Kennecott Land Company jointly owns and operates land with Kennecott Utah Copper. Simplify to Kennecott ownership and management is preferred. Implication there is a transition from mining to development is misleading since plan on mining past scope of plan of 2030 (page 4-9-14).	Thank you, change will be made in Section 4.9.
16	41	Headwaters	Reference to two-year completion is an error and should be removed. Kennecott continues to study future land use of Oquirrh Mountain Land Use Plan (page 4-9-15).	Thank you , change was incorporated.
16	42	Headwaters	West Bench General Plan and zoning of Oquirrh Mountains has ceased but Kennecott Land is studying two areas for development feasibility. References to the West Bench Plan, Planned Community Zone, and development agreement should be eliminated from text. West Bench vision is in tact, but timing will be base upon current and post mining operations (page 4-9-18).	Thank you, change was incorporated.
17	43	Point Sources/ Wastewater	More stringent BOD testing. Federal policies should be a technology based program and not water quality based.	There are discussions underway at the national level regarding the use of BOD_5 as a design tool for wastewater treatment facilities. The outcome may influence future updates of this document.
18	44	Point Sources/ Wastewater	Table E.3 is misleading. Shows "Total Current Capacity" is 172.3 mgd, whereas the projected total daily flow at all existing plants is but 166 mgd.	The existing wastewater treatment plants in the County have the capacity to treat up to 172.3 mgd, whereas the current flow is 118 mgd. This analysis indicates that the existing treatment plants have the capacity to treat the projected increase in wastewater flows by 2030. This analysis does not address the issues relating to conveyance of wastewater flows.
20	50	Utah Lake	East Jordan Canal also delivers water to other shareholders that are unrelated to exchange contracts (Section 4.8.4).	Acknowledged. Additional use was incorporated.
20	51	Utah Lake	The Utah Lake-Jordan River basin is severely over-appropriated and it would be very unlikely that there would be excess water available in the basin. The State Engineers Office may not grant excess water rights for such uses as mentioned (Section 4.8.4).	One of the recommendations in Section 4.8.6 discusses the State Engineer's water rights adjudication process, and the need to prioritize this process in the County. This process will determine water appropriation in the watershed.
20	52	Utah Lake	Exchange agreements are critical to the drinking water supply. Much of the drinking water supply relies on the Utah Lake Storage Water Rights where irrigation water is exchanged for high-quality drinking water along the Wasatch Mountains (Section 4.8.4)	Agreed. It is not being proposed that exchange agreements be terminated but rather managed differently, such as modifying or moving diversion points, if beneficial and practical.
20	53	Stormwater	Stormwater impacts to the lower portions of the Jordan River tributaries must be studied and evaluated.	The County discharges municipal stormwater under a discharge permit issued by the DWQ. This permit includes 13 cities as co-permittees. Routine stormwater sampling is required under this permit. The impacts of stormwater to receiving water quality is currently being evaluated under the TMDL study.
23	68	Watershed Characterization/ Climate	Should be a section that highlights the need to address global climate change with recommendations to study this in the future.	Climate change is addressed in Section 3.9.1 (pg. 3-38 of the draft). The conclusions of the Governor's BRAC, as well as potential impacts to the Countywide watershed are presented. This will be an on-going discussion and will be further addressed in the next update.
23	69	Habitat	Land ownership should include the considerable amount of acreages managed for their wetland values by the various duck clubs within Salt Lake County, as well as including the National Audubon Society Gillmor Sanctuary, the Mitigation Commission properties and the Inland Sea Shorebird Reserve (page 4-7-51).	Thank you, change will be incorporated.
23	70	Point Sources/ Wastewater	If the TMDL study points to negative impacts of phosphorous loading or other discharges from wastewater treatment plants, they may need to change what they discharge into the waterways within Salt Lake County. WaQSP does not highlight this possibility, but certainly provides for considering it (page 4-2-31).	Comment noted. There are other sources of phosphorus that will possibly be needed to be controlled as well.
24	71	Implementation Jordan River	Jordan River delisted as soon as possible and swimmable by 2015.	See response to Comment #4.
24	72	Preservation/ Restoration	Stream corridor preservation and restoration.	Agreed, this is a goal of the WaQSP.

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LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
24	73	Point Sources/ Wastewater	Stricter wastewater treatment discharge permits. Clean up tributaries, including fecal coliform coming from Emigration Canyon.	See response to Comments #7 and #19.
24	74	Stormwater	Stricter stormwater discharge permits.	Stormwater discharge permits are issued by the State of Utah DWQ. The County currently conducts routine stormwater sampling in accordance with the discharge permit issued by the Utah DWQ. This monitoring is intended to identify trends and problem areas. In addition, the County implements Best Management Practices that serve to minimize stormwater pollution. The County will continue to investigate additional measures to address pollutants in stormwater runoff.
24	75	Nonpoint	Mitigate trash and nonpoint source pollution like golf courses.	See response to Comments #6 and #22.
24	76	Utah Lake	Water quality in Utah Lake.	The quality of the water coming from Utah Lake is a major consideration of the WaQSP (see Section 4.8, page 4-8-1 of the draft), as well as a Strategic Target (see page 2-5 of the draft). Recommendations are presented in Section 4.8 to address this complicated issue.
24	77	Implementation	Would like to volunteer and help.	Thank you. Please note programs identified in Chapter 6. Check their websites for volunteer opportunities, as well as the County's Water Resources website http://www.waterresources.slco.org/.
25	78	Strategic Targets	Seven Strategic Targets looks good (page E-2).	Comment noted.
25	79	Implementation	Important to look at cost:benefit ratio of the proposed implementation practices (page E-10).	Agreed, prior to implementing any projects or programs, the County will consider the cost:benefit.
25	80	Stormwater	Interested in participating in a study of the effectiveness of our storm water BMP's to know if we are spending our Storm Water Utility money in an effective way (page E-27).	In accordance with the County's stormwater discharge permit issued by the State of Utah DWQ, the County conducts routine stormwater quality monitoring, as well as implementation of a variety of stormwater Best Management Practices. In addition, the County conducts a 5-year review of monitoring results to identify trends in stormwater quality and to determine if stormwater pollution is being reduced to the maximum extent practicable as required by the discharge permit. Anyone is welcome to review these documents.
25	81	Implementation	Could/should any of the implementation practices also apply to the Riter Canal (page E-32).	For the purposes of this document, the focus has been on natural systems, implementation practices were not evaluated for canal systems. This may be a consideration for future updates.
25	82	Implementation	Sub-watershed recommendations are still general and interested in participating in the process as these become more specific.	Specific sub-watershed recommendations were not developed as part of this plan, as it was determined that this step is more appropriate between the partnering jurisdictions and is dependent on priorities in each sub-watershed. Please access the website for the current status of implementation.
26	83	Implementation	Current FCOZ Regulations offer sufficient development protection for the canyon watershed.	Comment noted.
27	84	Utah Lake	Concerned about water quality in Utah Lake and its tributaries.	Chapter 4, Section 4.8 addresses the affect of Utah Lake on the quality of water in the Countywide watershed. The scope of the WaQSP did not include tributaries to Utah Lake.
28	85	Watershed Characterization	Defining the watershed as including those waterbodies which reside within the limits of the County boundaries, diminishes the concept of a watershed approach when addressed from this perspective. By taking a more holistic view, it will open the door to participation from Utah and Davis counties.	There are several methods of developing watershed plans; in fact, watershed plans commonly focus on specific, individual watersheds, as opposed to a Countywide watershed. While it may be ideal to incorporate Utah and Davis Counties, Salt Lake County does not have any jurisdiction in these neighboring counties. However, Salt Lake County would be a willing partner with similar efforts.
28	86	Goals and Objectives	Integrate findings and recommendations of TMDLs in future iterations and amendments of the WaQSP.	That is the County's intent.
28	87	Point Sources/ Wastewater	TMDL findings should be integrated into the WaQSP Permitting Process and Division of Water Quality be consulted in concert with the consistency review of the WaQSP. Also, Salt Lake County coordinated studies and develop strategies to accomplish the goal of conveying wastewater across current district boundaries.	TMDL findings will be integrated into the WaQSP update and are the basis for permits in any nonattainment section. DWQ is involved in the consistency process by their approval of WaQSP (see Figure 4.2.28). A County-wide conveyance study has been discussed but is not funded at this time.
28	88	Stormwater	Division of Water Quality Stormwater Discharge Permit Program includes construction, industrial and municipal in separate program areas. Also, Utah does not possess large MS4's.	Noted. Salt Lake County was designated a large MS4 based upon the 1990 census during the original permit application.

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LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
28	89	Stormwater	Provide greater detail or guidelines with regard to requirements the County may place on stormwater connections (Section 4.3.2.4). Mechanisms in the County's planning process for addressing and requiring stormwater load allocations will be critical to meet endpoints of future TMDL's.	Requirements by municipalities placed on development are useful stormwater quality regulations. Each municipality has its own set of requirements. This fact will be incorporated, but a listing of all BMP requirements by municipalities is beyond the scope of this document.
28	90	Instream Flows	Installation of additional flow gauges and water quality collection sites to assess suitability of manipulating instream flows in tributaries and long term effects of flow augmentation.	See Chapter 6 - Implementation, which includes improving both quality and quantity of stream gauge data.
28	91	Utah Lake	County use Utah Lake TMDL study findings when available and priority placed on flow augmentation to improve water quality.	The County will use the TMDL findings to augment flow to the extent that augmentation can take place with sensitivity to water rights.
28	92	Instream Flows	Water rights acquisition and re-adjudication will likely be the most influential of planning process.	Comment noted.
28	93	Instream Flows	Evaluate the effects of flood control structures on the Jordan River. Integration of future studies and TMDL recommendations in flood management strategies to improve water quality.	Evaluation of flow management strategies included in recommendations under Implementation chapter.
28	94	Habitat	When information becomes available, refer to Utah Division of Water Quality for analysis and summaries of additional macroinvertebrate and habitat data to integrate into future WaQSP documents.	Comment noted.
28	95	General Support for WaQSP	Overall WaQSP represents a good model for watershed planning in the Jordan River and Great Salt Lake Basins.	Thank you. Please note programs identified in Chapter 6. Check their websites for volunteer opportunities as well as the County's Water Resources website http://www.waterresources.slco.org/
29	96	Instream Flows	Support recommendations for adjudication of water rights.	Comment noted.
29	97	Instream Flows	Support recommendations to improve channel capacity, water reuse, and automation and updated management of stream flow gages, diversions, measurements, and water use quantification.	Comment noted.
30	98	Regulatory	Where do Salt Lake City and Salt Lake County legislative powers start and stop?	SLC & SLCo have jurisdictions that extend through their municipal boundaries; SLC has extraterritorial jurisdiction to protect their watershed. Please see description in Section 3.4.
30	99	Regulatory	Does it apply equally across all Salt Lake County areas or only apply to the unincorporated areas?	Salt Lake County does not have the jurisdiction in areas outside unincorporated County. However, the County plans to partner with other jurisdictions in the implementation of this plan.
30	100	Regulatory	What is the public process and what is involved in the adoption of the plan?	A concerted effort has been made to inform the public of this plan development and to encourage public input. The intent is that the plan will be more successful with public involvement. Please refer to Appendix J for a listing of all the meetings conducted from 2006 to 2008. The WaQSP will be presented to the Council of Governments (COG) and the County Council for adoption in August 2008. The plan will then be sent to the Governor's Office and EPA for concurrence.
30	101	Regulatory	FCOZ as written is not a workable process and needs change before it should be included in this plan.	One of the recommendations in the WaQSP is that FCOZ be enforced to the fullest extent possible. It is the County's position that FCOZ is a good overlay zone ordinance, but needs to be enforced as written (i.e. without variances, or with minimal variances).
30	102	Economics	Oppose funding proposals of tax increases and suggest any state or county action to do so be put to the voters.	Comment noted.
31	103	Goals and Objectives	Pg. 1 - 4th task under 1st goal; “Implement” should not be capitalized	Thank you for the correction.
31	104	Goals and Objectives	Pg. 2 – 1st column, Line 9; should this refer to recreational opportunities instead of “social services”?	Thank you for the correction.
31	105	Goals and Objectives	Pg. 2 – 2nd column, Line 7; instead of “water purification function” say “water treatment capability”	Thank you, change was incorporated.
31	106	Goals and Objectives	Pg. 3 – 1st column, Line 24; change “Additionally…” to “Additionally, wetlands are an important habitat for migratory birds.”	Thank you, change was incorporated.
31	107	Goals and Objectives	Pg. 4 – section title; shouldn’t this be “Social/Recreational Functions”?	Thank you, change was incorporated.

LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
31	108	Goals and Objectives	Pg. 4 – Line 7; "…from human behavior." Add "due to misuse and/or overuse".	Thank you, change was incorporated.
31	109	Goals and Objectives	Pg. 4 – last line; change facilities to opportunities.	Thank you, change was incorporated.
31	110	Goals and Objectives	Pg. 5 – 1st column after 1st sentence; add "Targets may be altered in subsequent WaQSP updates."	Thank you, change was incorporated.
32	111	Atlas of Opportunities	Do not think Upper Little Cottonwood has an officially designated floodplain.	A review of the FEMA maps for the Upper Little Cottonwood Creek sub-watershed show detailed and limited flood zone areas.
32	112	Atlas of Opportunities	For Upper Little Cottonwood Creek Subwatershed primary land use, add Alta as an officially incorporated municipality.	Thank you, change was incorporated.
32	113	Implementation	Under Recommendations and Implementation, add Town of Alta to work collaboratively with (page E-28).	Thank you, change was incorporated.
32	114	Economics	Fee programs have always received huge opposition.	Comment noted.
32	115	Headwaters	Under implementation add the Town of Alta to the "work with" list (page E-29).	Thank you, change will be incorporated.
33	116	General Support for WaQSP	The WaQSP is a well prepared guidance document for present and future stewardship planning that includes what must be viewed as a broad and directional framework for future recommendations.	Thank you.
33	117	Implementation	During development, planning, and implementation; have participation and cooperation among landowners, property managers, the Emigration Canyon Community Council, the Emigration Improvement District and jurisdictional county,	Any project implementation would require participation and coordination with stakeholders. This serves to ensure effective implementation and maintenance.
33	118	Regulatory	Have early and effective participation in development of new or revised land use ordinances.	Any proposed ordinances will undergo the required public notice process, which may include a public hearing.
33	119	Implementation	Watershed planners use available local knowledge in the interpretation of collected baseline data for use in site specific implementation planning.	Coordination with stakeholders, including community councils will serve to include local knowledge of the area.
33	120	Monitoring	Have representatives of the Emigration Canyon Community Council review and discuss the Stream Function Index (SFI).	Anyone is welcome to review and comment on this report. Please contact the County at 468-2711.
34	121	Water Supply	Add statement that the County recognizes the existence of local source protection plans and zones for both groundwater and surface water sources within Salt Lake County, and supports efforts to minimize risk to source protection zones through coordination of planning and permitting activities (Section 4.5.9, page 4-9-12).	Thank you, change was incorporated.
34	122	Headwaters	Sandy has a source water protection plan (page 4-9-12).	Thank you, change was incorporated.
35	123	Atlas of Opportunities	Request the rating of Kersey Creek be based upon the natural base flow and not including the effluent from MagnaWRF.	At the planning level stage, wastewater flows have not been separated out in any of the streams. However, when implementation projects are developed, point sources will be
35	124	Atlas of Opportunities	Recommendation of minimum flow protection-values must be calculated on the base flow of Kersey Creek and not including any effluent.	Comment noted, and will be taken into consideration during the design phase of implementation projects.
35	125	Atlas of Opportunities	MagnaWRF opposes the acquisition and/or reallocation of water rights to the plant effluent.	The County does not have authority over acquisition or reallocation of water rights.
36	126	Implementation	Incorporate the Jordan River and Utah Lake TMDL recommendations in the WaQSP.	The Jordan River and Utah Lake TMDLs are not yet completed. Future updates of this plan will incorporate TMDL findings.
36	127	Point Sources/ Wastewater	WaQSP should include assurances that the results of the Jordan River TMDL, Farmington Bay study, and other studies will be included in considerations for any future permitting activities at Wastewater Treatment Plants.	The discharge of wastewater into a waterbody that is listed as impaired, is evaluated under the TMDL process. In accordance with the WaQSP Amendment Process described on pg. 6.32 of the draft, any new discharge permits must be reviewed by the County for consistency with the WaQSP. Results of any TMDLs will be a part of this evaluation - a statement to this effect has been added.
38	130	Atlas of Opportunities	In regards to Technical Memorandum #3, as an alternative, the Utah Division of Water Resources has projected populations and water use through 2050 for each water provider along the Wasatch Front.	For the purposes of the WaQSP, the year 2030 was used to analyze future conditions based on population projections by WFRC (Wasatch Front Regional Council). Wastewater treatment plants use TAZ (traffic analysis zone) data for their loading projections, which is also developed from WFRC data.
39	131	General Support for WaQSP	Congratulations to All - Well Done Salt Lake County!	Thank you.

LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
40	132	Monitoring	Need to test fish in Jordan River.	Fish tissue samples have been collected by the Utah Division of Water Quality from selected locations on the Jordan River as part of a state-wide comprehensive stream assessment program, since 2000. Numerous parameters were tested from each tissue sample including metals, as well as man-made toxins. Test results are compared to EPA health criteria which are designed to support safe consumption of aquatic species. As violations occur, fish consumption advisories are issued for the waterbody of concern. No warnings of this type have been issued for the Jordan River.
40	133	Nonpoint	Trash control and clean-up. Have trash containers along Jordan River.	See response to Comments #6 and #22.
41	134	Monitoring	Using baseline thermochemical studies to determine water quality.	Water quality testing must follow EPA certified procedures.
42	135	Water Supply	In Table 4.5.9-replace the last sentence in the description of Water Reuse with the following: JVWCD's contract for ULS System deliveries is subject to CUWCD's commitment to recycle 18,000 acre-feet of return flows from the Bonneville Unit segment of the Central Utah Project by 2030. JVWCD will therefore be supportive of wastewater reuse projects which will fulfill that commitment.	Thank you, change was incorporated.
42	136	Water Supply	Table 4.5.12 states the TDS of Utah Lake System supply is 150 ppm-needs to be double checked.	The TDS for the Utah Lake System is actually 159 ppm; Strawberry Reservoir is the source water. This will be corrected and clarified in the final document. The reference is *Central Utah Water Conservancy District, United States DOI, et al. (2004). Utah Lake Drainage Basin Water Delivery System Environmental Impact Statement,* Chapter 3, page 3-15.
42	137	Water Supply	Comment about Table E.5 also applies to Table 4.5.4	Unable to clarify comment.
44	141	Point Sources/ Wastewater	Concise yet comprehensive summary of the four wastewater facilities serving Salt Lake County residents (Section 4.2.2).	Thank you. Comment noted.
44	142	Point Sources/ Wastewater	Recent environmental trends may result in future segregation of all biodegradable from landfills. Greenhouse gas exchange organizations may offer economic incentive for Class A or B biosolids recycling (Section 4.2.4.2).	Thank you. Comment noted.
44	143	Point Sources/ Wastewater	Recycling of treated wastewater from wastewater treatment facilities in Salt Lake County and State of Utah are subject to water rights limitations found in the State's water recycling regulations. This serves to limit the number of creative water recycling opportunities within Salt Lake county (Section 4.2.4.3).	Thank you. Comment noted.
44	144	Point Sources/ Wastewater	Implies that siting of new, lower impact, aesthetically pleasing facilities may overcome past nuisance problems associated with existing facilities. In most instances, correction of nuisance issues can be accomplished at existing facilities at lower cost that new facilities (Section 4.2.4.5).	Thank you. Comment noted.
44	145	Point Sources/ Wastewater	Believe Salt Lake County should establish the guidelines and requirements to be met by each collection/flow allocation study completed by land development interests in the County (Section 4.2.6).	Existing municipal development policies and procedures for all Cities and the County would have to be modified to allow the County to impose guidelines and requirements for development outside of the unincorporated County boundaries. However, the Health Department regulations may be a tool to accomplish this.
44	146	Point Sources/ Wastewater	Concur with item 2 that the conveyance and flow allocation is crucial to optimizing the available capacity at existing wastewater reclamation facilities. Funding may be accomplished through establishment of a Countywide wastewater conveyance utility fund and/or enactment of impact fees and development standards (Section 4.2.6.3).	Thank you, comment noted. See response to Comment #145.
44	147	Point Sources/ Wastewater	Presentation of LOTT community values is a useful exercise and should be emulated by the County as part of the review and permitting paradigm. Believe values should include: 1) maximized use of existing facilities, 2) maximized recycling of water and residuals, 3) optimization of energy management for operation of collection and treatment facilities, and 4) required life-cycle cost analysis for alternatives so that the public's dollars are most efficiently spent (Section 4.2.7.3).	The County concurs that the four values noted in the comment, among others, should be used in the review and permitting process.
45	148	Characterization	Integrate aspects of the Jordan River/Great Salt Lake into the WaQSP. A more holistic view of the watershed will open the door to the participation from Utah and Davis Counties.	A thorough analysis of the Jordan River was conducted for this plan. The Great Salt Lake was analyzed as part of the Great Salt Lake Sub-watershed.

LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
45	149	Point Sources/ Wastewater	Work closely with DWQ to ensure that upon completion of TMDLs for the Jordan River, Utah Lake and Emigration Canyon; future WaQSP drafts integrate the findings and recommendations of these TMDL studies.	TMDL findings will be integrated into the WaQSP update (see response to Comment #87).
45	150	Point Sources/ Wastewater	TMDL findings incorporated in WaQSP permitting process (Figure E-3).	TMDL findings will be incorporated in the WaQSP permit review process. Please note that WaQSP does not issue permits but provides a process to coordinate potential water quality impacting activities, such as wastewater discharges.
45	151	Point Sources/ Wastewater	Salt Lake County evaluate and coordinate countywide sewer capacity and flow routine alternatives.	Thank you. See response to Comments #145 and #146.
45	152	Stormwater	Provide greater detail or guidelines to the requirements the County may place on stormwater connections. Section should reflect that the wasteload allocations and potential reductions identified in the Jordan River TMDL will include recommended BMPs to address stormwater loading rather than traditional load reductions applied to other point sources (Section 4.3.2.4).	Additional flow gauges are being installed on ungauged Jordan River tributaries. It is not known at this time what tools will be used when WaQSP is updated. Flood control is a necessary function that will always be the responsibility of the County. Structures in waterways, especially in developed areas, are a fact that the County has to recognize. However, structures will be evaluated and in the future designed with water quality considerations. The County will use the TMDL findings to augment flow to the extent that augmentation can take place with sensitivity to water rights (see comment 91).
45	153	Instream Flows/ Utah Lake	DWQ encourages installation of additional flow gauges in tributaries and evaluating the long term effects of flow augmentation. Unclear in WaQSP if propose NAHAT and IFIM use in future iterations of plan. Also encourages the TMDL findings to be utilized and priority be placed on flow augmentation for the improvement of water quality. Recommendations should include the effects of flood control structures on the physical environment of the Jordan River and integration of future studies and TMDL recommendations in flood management strategies to improve water quality.	Evaluation of flow management strategies included in recommendations under Implementation chapter.
45	154	Habitat	Additional macroinvertebrate and habitat data available from the EMAP and UCASE programs and should be available by Summer 2008.	Thank you, reference to this data has been incorporated.
46	155	Point Sources/ Wastewater	Was any quantity of infiltration taken into account, either preventable and/or non-preventable (Page 4-2-37)?	Yes, infiltration/Inflow rates of 1.0 gpcd were included in the flow projections.
46	156	Water Supply	Should be more clearly written about the wholesale/retail relationships and/or the nature and purpose of the organizations of MWDSLS, JVWCD, Salt Lake City, and SLCPU (Section 4.5).	A discussion regarding water supply sources is provided on page 4-5-1 of the draft, including water suppliers and providers. In addition, detailed information regarding the principal water providers is found on page 4-5-7 of the draft.
46	157	Habitat	Should be noted all subsurface waters from the east side of the mountains is collected and diverted north (Section 4.7.3.2)	Statement is not accurate.
47	158	Nonpoint	There is no mention of the pesticide management group in the Department of Agriculture.	Thank you, change was incorporated.
47	159	Instream Flows/Utah Lake	Division of Water Resources would like to be involved in a countywide hydrologic modeling on the effects of Utah Lake on the water resources in the Salt Lake valley.	The County requests the participation of the Division of Water Resources.
47	160	Instream Flows	Nothing is mentioned about Water Resources cloud seeding, weather modification, etc., which is a fairly high benefit/cost solution (Section 4.6.4).	Thank you, comment was incorporated.
47	161	Watershed Characterization/ Climate	Climate change/drought should be an issue that should be grappled at some point. Water banking is a recommendation that should be placed in the Atlas of Opportunities to address this, as was done in Yakima, WA.	Added climate change discussion to Watershed Characterization chapter. Water banking recommendation included in Instream Flows Planning Element.
47	162	Watershed Characterization/ Water Quality	Water quality connection between the Jordan River and the Great Salt Lake marshlands should be discussed.	Mention of potential impacts to the wetlands associated with the Great Salt Lake has been added.
47	163	Point Sources/ Wastewater	There should be more information about pharmaceuticals and their impact on the treatment process and the environment.	Agreed, the extent and impact of pharmaceutical drugs, their impact upon the Jordan River and Great Salt Lake, and the problems and concerns with their treatment and removal from the wastewater stream are largely unknown in the County. Future updates of the WaQSP will most likely address this issue.

LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
48	164	Headwaters	It has been estimated that about 50,000 acres of groundwater has been contaminated and unfit for use. That is 50,000 acre-feet of water for every foot depth that the contamination has penetrated. One acre-foot will supply all the water needs of an average Utah family for an entire year.	Section 3.8.1 of the draft has been expanded to include an additional discussion of groundwater quality in Salt Lake County. In addition, the 5 active EPA National Priority List (NPL) sites that require remediation efforts are now listed. Groundwater contamination may be addressed furthe in future updates.
49	165	Economics	Recommended funding mechanisms for mitigation, as well as other funding recommendations, should be clearly stated to avoid potential confusion (Sections 4.1.1, 4.1.3, 4.1.5, Executive Summary, and Introduction).	Funding opportunities for WaQSP updates and corridor preservation are addressed separately in both the Executive Summary and in Chapter 4 (see pages E-10 & E-11, and Sections 4.1.3. and 4.1.4.)
49	166	Economics	Utah Code Section 11-36-202(5) statute does not appear to support the broad statement in the WaQSP (Section 4.1.3.3).	The Code reads as follows, "(a) the local political subdivision has formally agreed to fund a Habitat Conservation Plan to resolve conflicts with the Endangered Species Act of 1973, 16 U.S.C. Sec 1531, et seq. **or other state or federal environmental law or regulation**" (emphasis added), which would support the statemens in this section.
49	167	Instream Flows	In order to be successful, the Instream Flows planning element must consider approaches that are consistent and sensitive to existing water users, legal systems, water rights, court decrees, and state law.	Agreed.
49	168	Instream Flows	Many lake effect precipitation events favor the Oquirrh Mountains (page 4-6-38).	Thank you, comment was incorporated.
49	169	Instream Flows	A correct description of Kennecott Utah Copper's operation would be: "Surface and shallow subsurface water that would naturally drain to Butterfield Creek is collected by a cutoff wall system that surrounds the exterior base of the mine. The water is conveyed into Kennecott's operations water system, where it is used for mine tailings conveyance and other processes. Kennecott is required to maintain zero discharge from its mining operations." (Page 4-6-42).	Thank you, change was incorporated.
49	170	Instream Flows	Water treatment plant near mouth Bingham Canyon is owned and operated by Kennecott Copper, which delivers treated water to JVWCD. The Bingham Tunnel is approx. hundreds of miles and it does not divert groundwater to Middle Canyon (page 4-6-43)	Thank you, correction has been made.
49	171	Instream Flows	Lee Creek flow was diverted back to original stream in 1998. Kersey Creek flows into Lee Creek prior to entering the Inland Sea Shorebird Reserve near the Great Salt Lake. USGS installed a flow meter on the outflow of the Inland Sea Shorebird Reserve and has been collecting measurements since 2006 (Section 4.6.2.5).	Thank you, correction has been made.
49	172	Utah Lake	Utah Lake is regulated in accordance with the Utah Division Water Rights Utah Lake Management Plan and Kennecott mining and land development operations are dependent on uninterrupted flow of water. Kennecott's water rights in the Utah Lake/Jordan River System have priorities as early as 1850.	Acknowledged, see response to comment #34.
49	173	Utah Lake	Utah Lake and Jordan River are also managed for Industrial use (Section 4.8).	Thank you, industrial use was incorporated.
49	174	Headwaters	Kennecott's Oquirrh Mountains land holdings should be clarified: 1) Kennecott Utah Copper owns the majority of land in the Oquirrh Mountains and, 2) most of the land area from Butterfield Canyon north to I-80. Currently there is no specific County general land use plan for this area (pages 4-9-14, 4-9-15).	Clarification will be made to reflect ownership.
49	175	Headwaters	In Section 4.9.2, 10th paragraph should state: "Kennecott Utah Copper and Kennecott Land Company manage the land consistent with legal requirements and land use stewardship and other environmental standards adopted by Rio Tinto, their parent company. A component of Rio Tinto standards is the development of a land use management plan. The management plan is intended to cover a wide range of land use factors, including establishing baseline data, changes in land use, vegetative cover, and a fire management plan." Rest of paragraph should be deleted.	Suggested wording was incorporated.
50	176	General Support for WaQSP	Salt Lake City is in support of the County's goals, objectives, and majority of findings and recommendations in the WaQSP.	Thank you for the support.

LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
50	177	Economics	Proposed funding mechanisms have a significant impact on Salt Lake City and are opposed to any third party levy or fee directly assigned to Salt Lake City customer's water and sewer rates. Any costs should be a direct "cost of service" fee assigned to the wastewater treatment facility permit. Also object to funding through Salt Lake City culinary water rates.	Comment noted.
50	178	Headwaters	WaQSP should more fully recognize & coordinate activities with Salt Lake City's culinary watershed protection, stewardship, and conservation programs.	Comment noted. WaQSP does recognize and plans to coordinate with Salt Lake City's programs.
50	179	Headwaters	WaQSP should emphasize that development poses one of the greatest threats to future of environmental health & water quality preservation in headwaters. Believe unfettered administration of FCOZ and limiting the extent and scope of variances and exemptions one of many good planning tools for responsible development in the canyons.	Comment noted. FCOZ is a good tool for controlling development in the canyons but is not a tool for curtailing or stopping development.
50	180	Stormwater	SLCo should continue to act as clearing house for information and provide expertise (BMPs) to cities within the County.	This is the County's intent.
50	181	Instream Flows	Instream flow management changes must include appropriate stakeholder representation and keep existing water and contract interest whole.	Comment noted.
50	182	Economics	Update the WaQSP every ten years due to the complexity, participation, and funding may require greater time (Section 4.1.3).	The decision to update the WaQSP every 6 years is related to the 2-year cycle that the DWQ issues its Integrated Report (303(d)). It was the County's opinion that a 10-year update cycle would be too long given the rapid growth the area is experiencing.
50	183	Economics	In unincorporated SLCo, recommend SLCo tighten up their variance options, limit the development of unacceptable installations, and enhance enforcing capabilities. Salt Lake City is opposed to fines in which surcharges "allow" degration and pollution of the watershed areas (Section 4.1.3).	Salt Lake County intends to continue to allow variances to rules and regulations within the regulatory authority to do so. It is noted that Salt Lake City is opposed to the "Charges for Watershed Degradation" funding option.
50	184	Economics	Identify potential new trailhead locations and include funding for facilities (Section 4.1.1).	Please refer to the Forest Service.
50	185	Economics	Provide conservation measures that will be enacted over purchased watershed properties by SLCo and how those measures will disallow selling the property in the future (Section 4.1.4.1).	Comment noted. Before a fee would be charged by the County for water service, an opinion from the District Attorney's Office would have to be issued.
50	186	Economics	Salt Lake City opposes any sales tax on water or wastewater and there also appears to be a nebulous nexus between SLCo charging a fee for water service (4.1.5.2).	Thank you, comment noted.
50	187	Instream Flows	Utah Division of Water Rights has the authority to preserve water for natural flows (Section 4.6).	Comment incorporated into Instream Flows Planning Element.
50	188	Instream Flows/ Utah Lake	Utah Lake-Jordan River basins are severely over-appropriated and it is unlikely that "excess" water will become available. Current agreements must be taken into account before proposed recommendations include changes to simulate a natural flow to the Jordan River (Section 4.8).	One of the recommendations in Section 4.8.6 discusses the State Engineer's water rights adjudication process, and the need to prioritize this process in the County. This process will determine water appropriation in the watershed.
51	189	Economics	What is the method of participation for field research for cities and other agencies? How will data be shared and who will fund it?	Currently research is funded through federal and state grants, in conjunction with universities. Data is available through the administering agency. In regards to the data collected for the watershed characterization, the County will share all of the data developed with cities. The County will coordinate with the cities with regards to future field research efforts and methodologies (i.e. future updates of the SFI) through meetings with the Jordan River Watershed Council. The County plans to work collaboratively with cities in future data collection
51	190	Economics	Is there a model ordinance for LID's and is there a proposed LID ordinance for drainages?	There are many resources online with regards to LID and other programs with the similar goals. The County will take advantage of available resources when proposing ordinances for adoption.
51	191	Point Sources/ Wastewater	Have all the holders for NPDES permits been listed properly in the report?	Holders of UPDES discharge permits as of 2007 have been shown graphically in Figures 3.13.8 and 3.13.9. Permit holders are provided in Appendix B of the final report.
51	192	Implementation	How will priority of improvements for a drainage be selected when issues compete and who gets to select the top priority?	Setting priorities for project implementation must consider several factors in addition to the nature of the problem. This includes, funding, property ownership, and willing partners. The County will work with partners to establish priorities.

LETTER #	COMMENT #	SCOPE	SUMMARY	RESPONSE
51	193	Implementation	Perhaps use the CH2MHill 1990's model the Kennecott Groundwater Cleanup for the Countywide hydrologic model (Section 6).	The County will take this into consideration.
51	194	Point Sources/ Wastewater	For security reasons, diagrams of the treatment facilities and chlorination facilities should be held in a restrictive appendix or modified to exclude sensitive information.	Thank you for the comment. Information regarding these facilities is well publicized, therefore, printing aerial photos of these facilities is not considered to be a security threat.
51	195	Economics	There should be a recommendation for which funding mechanism is best for the program. The management plan requires a Countywide funding mechanism (Section	Agreed, a recommendation for funding has been added.
51	196	Atlas of Opportunities	Maps of Barney's Creek and Bingham Creek drainages need to be updated.	Thank you. Will work with you to correct.