



September 24, 2025

Teresa Wilhelmson, State Engineer, and Division Director
Blake Bingham, Deputy State Engineer
Attn: GSL Distribution Management Plan
Utah Division of Water Rights
PO Box 146300
Salt Lake City UT 84114-6300

RE: Comments concerning draft Great Salt Lake Distribution Management Plan

Dear State Engineer, Wilhelmson and Deputy State Engineer, Bingham,

On behalf of the Great Salt Lake Watershed Enhancement Trust, which is jointly managed by National Audubon Society and The Nature Conservancy, we appreciate the opportunity to review and provide comments on the draft Great Salt Lake Distribution Management Plan ("Plan") and associated web-based Distribution Accounting Tool ("Tool"). We are also grateful for the opportunity to have met with agency staff to resolve many of our questions.

We appreciate the efforts of the Utah Division of Water Rights ("Division") in preparing these resources to effectively track and manage Great Salt Lake Water Rights and Dedicated Water for the lake, and the Division's commitment to adapt the Plan in the future as may be needed. The Plan and Tool transformed the complex underlying legislative requirements into a workable methodology. We also acknowledge that the Plan for administering these water rights is unique to Great Salt Lake, while still incorporating principles of prior appropriation in its approach.

We offer a few comments seeking clarification in the Plan and Tool.

1. Distribution Management Plan – Distribution Accounting Tool – Section VIII(E)

- a. Section VIII(E) – The first sentence of the first paragraph of section VIII(E) refers to "Section IV – Water Dedicated to Great Salt Lake." However, section IV pertains to "Great Salt Lake Water Rights" and Section V pertains to "Water Dedicated to Great Salt Lake." It appears that the reference to Water Dedicated to Great Salt Lake should be renumbered to Section V.
 - i. The first sentence of the first paragraph of section VIII(E) states that "[Dedicated Water will be accounted for on an annual basis according to the quantity of water delivered or converted in situ under water rights approved for beneficial use ...
 1. Please consider using punctuation to clarify the difference between "water delivered" and water "converted in situ." For example: "...[a]ccording to the quantity of (i) water delivered, or (ii) converted in situ under water rights approved for beneficial use . . ."

2. Additionally, this paragraph is the only location in the Plan that references “water converted in situ.” Please consider clarifying the term “water converted in situ.” For example, the term could be defined or substituted by referencing voluntary arrangements or some other means of clarification.

2. Distribution Accounting Tool – Accounting Reports – Dedicated Water – Accounting Summary

- a. We observed that WR 35-476 (a47913- Hooper Slough) does not yet include an acre-foot amount attributed to it for each year of reporting. We appreciate the Division’s willingness to update that information once the measurement information is provided and to also incorporate the deliveries into the Weber River Commissioner’s Report going forward.

Thank you for considering these comments on the Plan and Tool. We look forward to seeing the Plan implemented as we work towards a healthy Great Salt Lake.

Sincerely,



Marcelle Shoop
Executive Director
Great Salt Lake Watershed Enhancement Trust

CC: Great Salt Lake Watershed Enhancement Trust Executive Committee
-Megan Nelson, Utah Policy & External Affairs Director, The Nature Conservancy
-Karyn Stockdale, Sr. Director, Western Water, National Audubon Society