

## *Provo River Watershed Council*

*195 North 1950 West  
Salt Lake City, UT 841116*



September 19, 2016

Mr. Doug Smith  
Wasatch County Planning Office  
55 S 500 East  
Heber, UT 84032

RE: Proposed Mayflower Resort Development Plan

Dear Doug,

I am writing to you representing the interests of the Provo River Watershed Council (the Council). As you know, the Council is a coalition of local, state and federal government agencies, water districts, and private organizations dedicated to protecting the water quality in the Provo River Watershed. The Council's mission is to promote and support Watershed best management practices to ensure high quality water for all users and to meet designated beneficial uses in the Provo River Watershed. We have appreciated the many years of working with Wasatch County to review development proposals and give input to these proposals which have had a lasting, positive impact on the watershed and its water sources.

The Council has long been actively involved in protecting water quality. In 1984, the Council, then known as the Jordanelle Technical Advisory Committee, prepared the Deer Creek and Proposed Jordanelle Reservoir Water Quality Management Plan. In addition to goals to reduce phosphorus loading to the reservoirs, the 1984 Plan also identified other pollution prevention strategies including:

- Storm runoff control for new developments
- Enforcement of existing ordinances
- Runoff Control plans for new private developments
- Stabilize or remove Olsen-Neihart Reservoir tailings pond when Jordanelle Dam is constructed
- Stabilize Mayflower tailings ponds
- Storm runoff control around Jordanelle Reservoir

The Mayflower Resort Development proposal, which is currently before Wasatch County for density determination and master plan approval, is one such development that the Council would like to give input on. The Council has a keen interest in this project because of the project's size, past historical uses, and proximity to Jordanelle Reservoir.

The sheer size of the project and the construction associated with it will have the potential to increase the variety and amount of pollutants carried into the surrounding surface waters. We would suggest that to mitigate these disturbances and potential impacts that Low Impact Development (LID) techniques be incorporated during the early stages of the planning process. LID is an approach to land development (or re-development) that works with nature

Mr. Doug Smith  
September 19, 2016  
Page Two

to manage stormwater as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat stormwater as a resource rather than a waste product. This type of development is perfect for a high mountain project such as Mayflower.

The past mining that has occurred on the property has also created some conditions that require special consideration during planning and development. The mine tailings ponds (three ponds which cover approximately 15 acres) that are on the east side of US40 contain rock with heavy metals. The ponds were only partially reclaimed in 2003. It is imperative that these mine tailings be reclaimed as outlined in the updated reclamation plan submitted to the Utah Division of Water Quality in 2015. The updated reclamation plan takes into account environmental stabilization of the tailings. Disturbance of these mine tailings could cause serious impact by leaching metals into the Jordanelle Reservoir, a drinking water source for approximately 65% of the state's citizens. We suggest that once future plans are identified for the tailings ponds that the reclamation plan be re-evaluated to determine if any changes are necessary to support the future development. This may include evaluating structural and environmental integrity. As an added measure we suggest that all stormwater drainage from the tailings pond area be retained on-site and not discharged into drainages that discharge into Jordanelle Reservoir.

Additionally, we have some concern of the water discharging from the Mayflower Mine Portal. Recent sampling indicates various heavy metals being discharged from the Mine. This water finds its way directly to Jordanelle Reservoir through Big Dutch Pete Hollow Stream. Water contaminated with high concentrations of metals, dissolved solids, or salts can negatively affect surface water quality, aquatic ecosystems, and groundwater quality. In order to ensure that the quality of water leaving the Mayflower mine is not adversely affecting Jordanelle Reservoir, we would request that the developer prepare a water management plan to minimize the potential for water contamination, and to prevent the release of polluted water into the environment.

The Council has also received input from the Bureau of Reclamation regarding mitigation measures associated with the development of Jordanelle Reservoir. There are areas adjacent to the Mayflower lands that are recognized wildlife protection areas. Also, the existing crossing under US40 was developed partially to provided access for wildlife crossing. These mitigation measures need to be maintained and should be considered during the planning and development of the Mayflower properties .

Again, we appreciate the opportunity to work with you and Wasatch County in protecting the Provo River Watershed.

Sincerely,



Alane E. Boyd, P.E.  
Desert Rose Environmental

Cc: Sandy Wingert, Utah DWQ  
Kent Kofford, USBOR  
Erica Gaddis, Utah DWQ