



District 12

October 15, 2012

Robert LaVenture
District Director

Chris Youngmark
Assistant to the Director

Jason Gipson, Project Manager
U.S. Army Corps of Engineers
533 West 2600 South, Suite 150
Bountiful, Utah 84010

Re: GSL Minerals Proposed Expansion

Dear Mr. Gipson:

I am writing to you regarding the proposed expansion project of Great Salt Lake Minerals Corporation, a subsidiary of Compass Minerals, in the Great Salt Lake watershed. As a labor union, we understand the importance of economic growth and job creation. We also recognize that creating sustainable jobs requires careful, respectful and well thought-out use of natural resources. On behalf of our members who live, work and recreate in Utah, the United Steelworkers (USW) has serious concerns about the proposed expansion for a number of reasons.

Background and General Comments

In an apparent effort to appeal to the Great Salt Lake community and organic farmers, the company has run a well-resourced advertising campaign (including media outreach and a dedicated website) that promotes the expansion as environmentally responsible, and that promotes itself as a responsible corporation. In this campaign, that some would refer to as “green washing,” the company has erroneously referred to their mineral extraction operations as “natural,” “environmentally responsible” and “green,” while failing to divulge the long-term ecological consequences on the Great Salt Lake watershed’s ecosystem.

Great Salt Lake Minerals Corporation’s primary product is sulfate of potassium (SOP), which is used as a soil amendment. The company currently operates 40,000 acres of solar evaporation ponds at the Great Salt Lake to produce salt, magnesium chloride and SOP, their most lucrative product. According to company records, their anticipated production of SOP from Great Salt Lake solar ponds for 2012 is 350,000 tons. In reference to this operation, the parent company, Compass Minerals stated in their 2011 annual 10-K report:

*“We believe the recoverable minerals exceed 100 years of reserves at **current production rates and capacities** (emphasis added) and are so vast that quantities will not be significantly impacted by our production.”*

However, Great Salt Lake Minerals proposes to increase their SOP production by 60%. Their desired expansion will include 91,000 acres (142.2 square miles) of solar ponds and is expected to yield 220,000 tons of SOP, bringing the expected total solar pond-based annual capacity to approximately 570,000 tons per year. At these increased rates, the mineral “reserves” will be much more rapidly depleted.

Formed over 30,000 years ago, the Great Salt Lake is part of a unique watershed. The Great Salt Lake is more saline than sea water and is the world’s fourth largest terminal lake (no outflow). Seventy five miles long and 35 miles wide, it is the largest salt water lake in the Western Hemisphere. It is fed by precipitation and by 3 primary fresh water tributaries: Ogden River, Jordan River, and the Bear River.

These water bodies and their associated wetlands support up to 8 million waterfowl, 1.4 million shore birds, and some 250 different species, including insects and mammals. Tens of thousands of Canada geese and great numbers of raptors, such as the American white pelican and Snowy plover depend upon this watershed. This unique environmental area provides substantial hunting, fishing and recreational opportunities for my union’s members, as well as other Utahans and visiting tourists.

Evaporation ponds

The proposal to add 91,000 acres (142.2 square miles) of solar evaporative ponds will impact 80,000 acres of water and wetlands. In fact, according to the Army Corps of Engineer’s Public Notice Number 2007-00121, ***“The proposed project would result in approximately 80,000 acres of permanent adverse impacts to waters.”*** Obviously, a project of this size in an ecologically sensitive area will have an enormous adverse effect on water quality, water elevations, salinity and the natural ratio of mineral concentrations, which may disturb or destroy wetlands, wildlife habitat, (food, shelter, nesting areas), and biota in the Great Salt Lake, including, but not limited to, Brine shrimp, Brine flies, and algae, all of which are important food sources for birds. Since the harvesting of Brine shrimp on the Great Salt Lake is a viable industry, the impact on Brine shrimp may have an adverse economic impact, as well.

The proposed expansion involves the construction of ponds on both the east and west sides of the Lake. The western pond area appears to involve the consumption of many miles of shoreline, of which shorebirds and other wildlife are likely dependent. The eastern expansion is in proximity to the Bear River Bay and the Bear River Migratory Bird Refuge, both ecologically delicate areas that deserve protection. Given the importance of these unique and biologically sensitive areas to wildlife and wildlife habitat, it seems imperative that a thorough and comprehensive evaluation of alternatives be explored before any construction is allowed. If it is the ultimate decision by all parties for the evaporation ponds to be constructed in these areas, it seems reasonable that full reclamation and restoration plans be in place prior to their erection. To ensure that the future reclamation of ponds will occur, a timeline for completion should be established and the associated necessary financial resources should be held in bond or escrow.

Dikes and Causeways

To create dikes, approximately 540,000 cubic yards of fill would be discharged into Bear River Bay and 4,700,000 cubic yards of fill would be discharge into the water “in the vicinity of Clyman Bay.” As you know, the Bear River is a fresh water body that supports a variety of species. It seems extremely important to assess every possible impact the discharged fill would have on water levels, water quality, wildlife, and the food chain. Since the fill would disturb the lake bed, it is reasonable to presume that mercury, selenium and other harmful constituents might be released. Selenium can cause significant reproductive problems to fish and aquatic-dependent wildlife as a result of its ability to accumulate in the aquatic food web. Bacteria can transform mercury to methyl mercury, making it available to bioaccumulate in wildlife where it can have both toxic and terotogenic impacts on species throughout the food chain, including humans who may consume contaminated fish or waterfowl.

Another concern is that these structures might serve as pathways for predators to invade bird nesting areas. Measures should be taken to ensure that predators cannot access sensitive areas that are currently unreachable.

The dikes and causeways may intensify flooding when lake levels fluctuate. For example, in the 1980’s the Lake rose nearly 12 feet, causing extensive flooding, which was alleviated only after the State of Utah spent over \$3 million to breach the Union Pacific causeway and allow the waters on either side of the causeway to equalize. Reportedly, problems associated with this causeway (e.g. disproportionate brine exchange) continue to plague the Lake. Therefore, the impact on flooding should be evaluated before allowing the construction of dikes or causeways and a fully funded reclamation plan should be in place prior to their construction.

Social Responsibility and Legal Compliance

The values and practices of companies are generally very important to the communities in which they operate. As previously mentioned, Great Lakes Minerals has run an advertising campaign promoting the expansion of its evaporation ponds as environmentally responsible and promoting itself as a responsible corporation. I have raised concern above about the potential environmental impacts of the proposed project. I’d now like to raise concern about the corporation itself that Great Lakes Minerals is a part of, Compass Minerals.

Compass Minerals is also the corporate parent of North American Salt, which operates a salt mine in Cote Blanche, Louisiana. USW Local 14425 represents about 100 production and maintenance workers at the mine. North American Salt has repeatedly failed to comply with federal laws governing worker health and safety as well as labor relations at the mine. Since January of 2011, the Mine Safety and Health Administration (MSHA) has cited North American Salt’s Cote Blanche mine with 178 violations, 68 of which were considered “significant and substantial.” In fact, in late July and early August 2012, MSHA inspected the mine and found conditions so dangerous that the inspectors temporarily shut down the mine while the company corrected the problems. Inspectors’ reports indicated that some of the violations were for

conditions that could have reasonably expected to be fatal and three of the recent violations were categorized as "unwarrantable failure," which MSHA explains "may be characterized by such conduct as "reckless disregard", "intentional misconduct", "indifference", or a "serious lack of reasonable care." Most disturbing is the fact that the mine operator had been cited as many as 22 times over the last two years for the same "significant and substantial" violation. Also, two administrative law judges and the National Labor Relations Board have decided that North American Salt has committed numerous violations of the National Labor Relations Act in ongoing negotiations with USW Local 14425 for a new labor agreement.

Additionally, over the last couple of years, the Occupational Safety and Health Administration (OSHA) has cited North American Salt for a number of "serious" health and safety violations at their packaging plants in Wisconsin and Minnesota.

Although this recent history of violations of worker health and safety laws and labor law may not have a direct impact on Utahans or the Great Salt Lake, we believe these facts demonstrate a corporate culture of disdain for important federal laws.

The USW hopes that you will recognize and consider our concerns and recommendations. We trust that the Army Corp of Engineers will carefully evaluate Great Salt Lake Minerals expansion project in accordance with the National Environmental Policy Act. Please do not hesitate to contact me if you wish to discuss this matter further.

Sincerely,



Robert LaVenture, Director
USW District 12

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