# Running Out of Water:
## Utah Inland Port Development in the Great Salt Lake Basin

A report by the Stop the Polluting Ports Coalition, February 18, 2026

@David Jackson Photography

### Introduction

Utah is one of the driest states in the nation and is experiencing a 25-year drought, yet it is also one of the fastest growing. These two facts converge in the urgent question: how much water is available and under what conditions?

What we know now is that we do not have enough water to continue our current use of Great Salt Lake Basin water resources and maintain a healthy Great Salt Lake. To make matters worse, 150,000 acre feet is imported into the Great Salt Lake Basin from the Colorado River, which is already in dire straits. Something's got to give.

Before fast tracking and subsidizing water intensive development in communities already facing shortages, hard questions need to be asked and answered. Otherwise, Governor Cox's formal pledge to "Fill the Great Salt Lake by the 2034 Olympics" will fail.

Our hope is that this report serves as a wake-up call for communities and their leaders throughout Utah to dedicate enough water to the Great Salt Lake and improve the health of our communities.

**Great Salt Lake Basin Overall Water Policy Recommendations:**

Before public subsidies are bestowed on development projects, there must be a publicly available analysis of the project's impact on local water resources, particularly groundwater.

1. The Great Salt Lake Commission should create a process for annual water budgets ("water budgets" ) for each GSL Basin aquifer it is responsible for.

2. The State of Utah should tabulate all available groundwater mapping for critical GSL Basin aquifers and validate with the soil borings needed to determine and document groundwater depths, flow direction, and contamination migration potential.

3. The State of Utah should conduct an analysis of cumulative wetland and Pacific flyway impacts due to the development and dewatering completed to date and proposed. The State should include data on the actual results of claimed "wetland mitigation" projects compared with the lost wetlands and biodiversity they were intended to "restore."

4. No State development subsidies should be granted (e.g. property tax differential payments, low-interest loans, and grants) unless the impacted GSL Basin aquifer has a sustainable water budget, confirmed groundwater mapping, and an understanding of the damage done to date by existing development and dewatering on the Great Salt Lake, its associated wetlands, and the critical International Pacific Migratory Bird Flyway.

**Salt Lake County: "NWQ" Water Policy Recommendations: (page 15)**

1. The Utah Inland Port Authority (UIPA) should implement the original wetlands protection, Dark Sky standards and eco-industrial buffer requirements in the Northwest Quadrant Master Plan that they agreed to when they took control of the NWQ.

2. UIPA and SLC need to expand the proposed SLC water conservation plan amendment to the general plan to require an equitable limitation of excessive daily industrial water consumption by new businesses in both the NWQ and SLC.

3. UIPA needs to finalize the high-quality stormwater pollution prevention process it agreed to implement when it took control of the NWQ.

4. UIPA should prioritize the restoration of the Bailey's Lake area and the protection of the wetland playa in adjacent areas such as Northpoint using the funds available and committed to do so.

5. No State development subsidies should be granted (e.g. property tax differential payments, low interest loans, and grants) unless the NWQ has a sustainable water budget, confirmed groundwater mapping, and an understanding of the damage done to date by existing development and dewatering on the Great Salt Lake.

**Tooele County: "Tooele Valley" and "20 Wells" Water Policy Recommendations (page 27)**

1. The State of Utah and Tooele County should create a long-term water budget for Tooele County including detailed groundwater mapping for the areas impacted by the Tooele Valley and 20 Wells UIPA projects.

2. Tooele County and the UIPA Tooele Valley and 20 Wells projects should develop and implement a plan to restore and preserve the biological health of the adjacent Great Salt Lake wetlands and adopt and implement the same development standards as established for the UIPA NWQ project area including Dark Sky standards, eco-industrial buffers, and equitable limitation on excessive daily water consumption by new businesses.

3. No State development subsidies should be granted (e.g. property tax differential payments, low interest loans, and grants) unless the Tooele Valley aquifer is shown to have a sustainable water budget, confirmed groundwater mapping, and an understanding of the cumulative impact of proposed local developments.

**Utah County: Utah Lake Policy Recommendations: (page 19)**

1. The State of Utah and Utah County should develop a long-term water budget plan for the County that includes a scenario that does not depend on the import of any additional Colorado River water.

2. The Utah Lake Authority should develop and implement a county wetland preservation and mitigation plan that builds on and continues the successful June Sucker habitat restoration plan.

3. The Utah Lake Authority and the relevant UIPA and MIDA Authorities should coordinate to implement a set of wetlands preservation and mitigation measures as already defined for the UIPA NWQ including Dark Sky standards, eco-industrial buffer zones, and equitable limitation on excessive daily industrial water consumption by new businesses as in the NWQ and Salt Lake City.

**Utah County: Cedar Valley "Pony Express" Policy Recommendations: (pages 21-23)**

1. The State of Utah and Utah County should create a long-term water budget for the Cedar Valley including detailed groundwater mapping as recommended for the Great Salt Lake and Utah Lake.

2. Execution of a cooperation land use agreement between the Utah Lake Authority and local land conservation organizations to conserve and preserve key undeveloped wetlands in the Cedar Valley, at the southwestern end of Utah Lake and in Spanish Fork.

3. The State of Utah should create and the UIPA Pony Express project area should implement a plan to restore and preserve the biological health of the Fairfield Sinks and establish the same development standards as in the NWQ and Utah County for wetlands protections,

Dark Sky standards, eco-industrial buffers, and equitable limitation on excessive daily water consumption by new businesses.

4. No State development subsidies should be granted (e.g. property tax differential payments, low interest loans, and grants) unless the impacted Cedar Valley aquifer has a sustainable water budget, confirmed groundwater mapping, and an understanding of the cumulative impact of proposed local developments including but not limited to additional warehouses, new data centers, large scale critical mineral mining in the Oquirrh and Lake Mountains, modular nuclear reactors and other users of limited water resources.

**Weber County: "West Weber" Water Policy Recommendations: (page 30)**

1. The State of Utah and Weber County should create a long-term water budget for Weber County including detailed groundwater mapping for the areas impacted by the UIPA West Weber project.

2. Weber County and the UIPA West Weber project should adopt and implement the same development standards as established for the UIPA NWQ project area including for wetlands protection, Dark Sky standards, eco-industrial buffers, and an equitable limitation on excessive daily water consumption by new businesses.

3. No State development subsidies should be granted (e.g. property tax differential payments, low interest loans, and grants) unless the Weber County aquifer is shown to have a sustainable water budget, confirmed groundwater mapping, and an understanding of the cumulative impact of proposed local developments.

**Box Elder County: "Golden Spike" Water Policy Recommendations: (page 32)**

1. The State of Utah, Box Elder County, and the Bear River Water Conservancy District should create a long-term water budget for Box Elder County including detailed groundwater mapping for the areas impacted by the UIPA "Golden Spike" project.

2. Box Elder County and the UIPA "Golden Spike" project area should develop and implement a plan to restore and preserve the biological health of the internationally vital Bear River Migratory Bird Refuge

3. Box Elder County and the UIPA Golden Spike project should adopt and implement the same development standards as established for the UIPA NWQ project area including for wetlands protection, Dark Sky standards, eco-industrial buffers, and equitable limitation on excessive daily water consumption by new businesses.

4. No State development subsidies should be granted (e.g. property tax differential payments, low interest loans, and grants) unless the Box Elder County aquifer is shown to have a sustainable water budget, confirmed groundwater mapping, and an understanding of the cumulative impact of proposed local developments.

**Purpose and Methodology**

Our report focuses on what is known about water resources in areas slated for state-subsidized development under the auspices of the Utah Inland Port Authority (UIPA). UIPA was created by the Utah Legislature in 2018 to provide public assistance to industrial developers largely, but not exclusively, in the form of tax breaks. Over the years, UIPA has expanded and now supports any kind of development. UIPA currently has 15 project areas in 16 counties throughout Utah with a projected diversion of over $1 billion in local property taxes from local communities around the State.

Utah is divided into "water resource areas." We collected and assessed existing information on the status of water resources in each area containing an inland port project area.

Part I of our report examines UIPA project areas within the Great Salt Lake Basin (excluding northern Juab county), although UIPA also has project areas in other Great Basin areas, as well as locations on the Colorado Plateau. We will describe these areas in Part II of this report, to be released at a later date.

**What's happening with our water?**

Water resources in Utah are currently being stretched to the limit. The persistent drought, rapidly expanding population, and warming climate with erratic weather patterns are flashing red warning lights for all Utahns. It is likely in many areas slated for state-subsidized development, that water resources are already over-allocated.

New industrial development is frequently being supported by water rights which are changed from agricultural to municipal and industrial use. Some types of industrial development, particularly in areas dependent on a limited groundwater aquifer, put a significant strain on local water resources. Local communities should be notified of these tax-subsidized projects, and comprehensive analyses of impacts on water resources need to be conducted

**Where does our water come from?**

Utah's water supply consists  of surface water and groundwater. Surface water comes from rivers, streams and lakes; groundwater is in underground aquifers. We also have human-made "transbasin" water transfer facilities where water from the upper Colorado River Basin (tributaries of the Green River) is moved to the Great Salt Lake Basin.

The Colorado River Basin, a water source for 40 million people, is governed by The Colorado River Compact, an agreement among the upper basin states (Utah, Colorado, Wyoming and New Mexico) and the lower basin states (California, Arizona and Nevada). With the demand for water exceeding the amount of water available, the Colorado River is in dire straits.

Twenty-seven percent of the water used in Utah comes from the Colorado River, with the majority of the state's water supply coming from other rivers that feed into the Great Salt Lake. In total, Utah uses about one million acre feet of Colorado River water yearly.

**Great Salt Lake**

Most of the available water in the Great Salt Lake Basin that should be making its way to Great Salt Lake, is surface water coming from the Bear River (62%), Weber River (23%)), and Jordan River/Utah Lake drainages (22%). Approximately 150,000 acre feet of Colorado River Water is transferred to the Great Salt Lake

Basin.

Due to population growth, a warming climate, and reduced precipitation, less of that water has ended up in Great Salt Lake, resulting in the drying of the lake.

The latest data from The Great Salt Lake Strike Team (January 2026) estimates that agriculture accounts for 65.1% of human-caused Great Salt Lake Basin water depletions, and municipal and industrial uses cause 26.3% of total depletions.

When addressing population growth in Utah, the Great Salt Lake Strategic Plan states:

> One thing is clear: everyone living in or moving into the Great Salt Lake Basin needs to embrace a new model for what growth looks like, one that values and limits the amount of water we need for every new home and business. [1]

In addition to surface water, groundwater is also important to the ecological health and water levels of Great Salt Lake. Both are being used at unsustainable rates, the specifics of which are not yet thoroughly researched.

In order for northern Utah to remain a healthy and desirable place to live, Great Salt Lake must be healthy, and to be healthy, it needs more water. The Great Salt Lake Strike Team estimates that GSL needs an additional inflow of 770,000 acre feet of water (from its baseline average) per year every year to be at a healthy level of 4198 feet or above. Currently the lake is at 4191.8 feet.

Elevation is not the only factor that defines a healthy Great Salt Lake (North Arm and South Arm). Severe environmental and health problems will be created if the surface area of the Great Salt Lake is not maintained at the optimal level.

Discussion of a healthy Great Salt Lake must include the area of dry lake bed exposed at each elevation as reported per the areal extent tables in the USGS report.

[1] https://greatsaltlake.utah.gov/wp-content/uploads/Great-Salt-Lake-Strategic-Plan-1.pdf p. 11

At 4190.8 feet in December 2025, the North Arm of the Great Salt Lake covered approximately 232,950 acres. At 4200 feet, the suggested optimal point between 4198 and 4202 feet, the North Arm would cover 384,580 acres.

Until the State of Utah takes effective action, it is allowing at least 150,000 acres of North Arm dry lake bed to be exposed, eliminating migratory bird habitat and creating multiple, new human health risks to men, women and children.
A square mile is 640 acres.The dried lake bed in the North Arm alone exposed is over 230 square miles. This is more than twice the size of Salt Lake City itself, which covers 111 square miles.

At 4193.3 feet in December 2025, the South Arm of the Great Salt Lake covers approximately 400,000 acres. At 4200 feet, the South Arm would cover 508,000 acres, which means another 108,000 acres of dry lake bed would be exposed. Again, the 168 square mile area is exposed, a shocking 1.5 times the size of Salt Lake City.

It is inconceivable that the State of Utah should continue to develop commercial, water-consumptive development in the Great Salt Lake watershed when there are over 400 square miles of dry lake bed exposed, almost four times the size of Salt Lake City.

The priority must be to restore the Great Salt Lake to protect Utahns and wildlife before the 2034 Olympics, as championed by Governor Cox. The destruction of wetlands for private profit must stop.

Ensuring a healthy water future for Utah and for Great Salt Lake will require us to make new policy choices. We must be smart about our choices and fully examine their potential consequences.

**State-subsidized Development in Areas with Stressed Water Resources**

Unfortunately, instead of planning wisely, we are rushing to subsidize development with Utah tax dollars.

Over the last 19 years, the legislature has systematically created taxpayer-funded financial tools to accelerate development throughout Utah. The Military Installation Development Authority (MIDA) was the first entity of this type in 2007, followed by the Utah Inland Port Authority (UIPA) in 2018, the Point

of the Mountain State Land Authority (2018), and the Utah Fairpark Area Investment and Restoration District (2024).

The creation of Public Infrastructure Districts in 2021 was an additional new tool to provide assistance to developers by allowing them to bond (borrow money) for their development projects. There are problems with each one of these bodies in terms of accountability to Utah taxpayers and the uses of public incentives, but this report focuses on the impacts of the Utah Inland Port Authority (UIPA).

According to their own planning documents, the Utah Inland Port Authority's project areas are anticipated to sweep up approximately $1.3 billion in property tax revenue which will be given to developers to fast track industrial development. The 15 project areas are in 16 counties and cover approximately 112,934 acres (this number continues to grow).

The financial tool provided to UIPA by the legislature is the right to draw a boundary around an area and use future property tax revenue to accelerate the pace of industrial development. Project areas are then put on track to borrow money through bonds, receive very low-interest loans from UIPA itself, and be eligible for other kinds of public financial support.

In 2019, the legislature voted to make UIPA project area tools available to any local government in the state. Projects are also eligible for low-interest Authority Infrastructure Bank Loans. Developers are unsurprisingly enthusiastic about all the public assistance they are being given.

At the April 16, 2024 meeting of UIPA's Authority Infrastructure Bank Loan Approval Committee, Benn Buys, who at the time worked for UIPA, was asked by a committee member how developers found out so quickly about the opportunity to borrow money from the Infrastructure Bank. He replied that when "cheap money" is available, "word gets around" and then pointed out that some of the "biggest developers in the state" were involved in UIPA project areas.[2]

**Water Resources in UIPA Project Areas**

Eight of UIPA's project areas are in the Great Salt Lake Basin where development pressure is enormous. All the counties in the basin are growing, and some of

[2] https://www.utah.gov/pmn/files/1112707.mp3 "cheap money" is available "word gets around" is in this time frame [10:24 - 10:40 - 11:08] in the recording. "biggest developers in the state" is spoken in this time frame [33:48 -33:52] in the recording.

this enormous growth is being publicly subsidized. All of these project areas will harm wetlands.

The Great Salt Lake Basin is an ecologically sensitive region containing areas with extremely limited water resources. Many of the publicly subsidized developments in the Great Salt Lake Basin will cause serious harm to the ecological resources, particularly wetlands and springs, of the Pacific flyway.

Take for example, project areas in Utah County and Tooele County, which are among the fastest growing counties in Utah. In Tooele County, there are two inland port project areas, one of which is 585 acres and growing, is adjacent to Great Salt, and includes Great Salt Lake wetlands. The other is 650 acres. These project areas will impact approximately 12,000 acres of high-functioning Great Salt Lake wetlands, through the impacts of adjacent industrial development.

Water in Tooele County is supplied through a groundwater aquifer. The last hydrological analysis was done in 2009, using data from 2003. Estimates on available groundwater are outdated, but what is known is that wells are drying up, and existing resources will not meet projected needs.

In 2021, Tooele County Economic Development Director Jared Stewart said with regard to water, "I don't know where that will come from yet; maybe that comes from the Salt Lake Valley, maybe that comes from south of Tooele Valley." Stewart continued,"That's the long-term solution, to bring water from outside of the valley. You can always drill more wells, but at a certain point, you get too many straws in the cup and that's kind of the reality of it."

In Utah County, there are also two inland port project areas. One is located primarily in the Cedar Valley, near Eagle Mountain, and the other is in Spanish Fork next to Utah Lake's Provo Bay.

The Cedar Valley Inland Port Project Area (consisting of three separate zones in the Cedar Valley) is a good example of the water resource problems caused by UIPA's subsidized development in Utah County. The Cedar Valley includes the rapidly growing municipalities of Eagle Mountain[3], Cedar Fort and Fairfield.[4] Significant wetlands exist within the town of Fairfield, which is facing serious

[3] Eagle Mountain population ~60,000, incorporated in 1996.
[4] Fairfield population 180, incorporated in 2004, formerly the site of Camp Floyd.

water quantity and quality problems. The Fairfield spring that feeds the wetlands is drying up and the well that currently supplies the town is at its limit.

Groundwater resources in the Cedar Valley aquifer are limited, and water rights may be over-allocated. Pollution from historic mining operations in the Oquirrh Mountains, Manning Canyon, has contaminated soil and water in Fairfield. And the Town contains a significant area of Great Salt Lake Basin wetlands which are in danger of destruction from dewatering of the aquifer and being paved over and polluted by development.

A 2012 report (based on 2007 data) by the Utah Geological Survey found that the Cedar Valley Aquifer was facing significant stress and isn't being fully recharged due to rapid development, setting up a scenario for significant drawdown of the aquifer.

> If 2007 pumping and average climatic conditions persist, the model predicts most areas of the basin-fill aquifer will experience as much as 15 feet of drawdown from 2007 levels. In scenarios that include doubling the 2007 well extraction rates, large areas of the valley are predicted to experience over 100 feet of drawdown, and the northeast corner of the valley, where recent bedrock wells have been developed for municipal use, generally would experience even greater amounts of drawdown.

In the 19 years since the UGS data was collected, development has exploded.

Yet, at their January 7 2026 meeting, the UIPA Infrastructure Bank Loan Approval Committee approved a request by Fairfield Town for a $1.6 million low-interest, 3.13% 15-year loan from the UIPA Infrastructure Bank with no collateral, to drill a well and build a water line for a new industrial park containing a data center, being subsidized by UIPA's "Pony Express" Project Area.[5]

In her presentation to the UIPA loan committee, the Mayor of Fairfield said that if they don't drill another well, they are "out of water." Meaning that without this well, the town can't provide water to the new data center. The well is being built for developers of the data center on property they have donated.

[5] The Fairfield Master Water Plan, adopted in May 2025 notes that a data center has been approved.

But it's unclear where the water will come from, and what the consequence will be for the Cedar Valley aquifer and adjacent communities.

Also of note, across the Great Salt Lake Basin several UIPA project areas are intended to facilitate the export of alfalfa to other countries. Alfalfa farming requires a lot of water. Alfalfa farming also makes up a small percentage of Utah's "gross domestic product" representing just 0.2% — on par with revenue generated by amusement parks.

Research by economist Gabriel A. Lozada found that: "Alfalfa and hay account for 68% of the 5.1 million acre-feet of water diverted every year in Utah." That means it takes 1.38 acre-feet, or about 450,000 gallons, to produce a ton of alfalfa — about as much water as two Utah homes typically use in a year. (An acre-foot is the amount of water it takes to cover one acre of land with one foot of water.)"

**Impacts to the Utah portion of the Pacific Flyway**

Because UIPA-subsidized development in or near Great Salt Lake Basin wetlands will also deplete groundwater resources, these developments pose a significant threat to the Utah portion of the Pacific Flyway.

The Great Salt Lake acts as the most critical stopping point in the Interior West for birds traveling the Pacific Flyway, a migratory path extending from Alaska to Patagonia. Because it sits in an arid landscape where other wetlands have largely disappeared, the lake serves as a vital refueling station for over 12 million birds, representing some 338 species, annually. For many of these species, the lake is not optional. Due to the steady aridification of the Great Basin, Great Salt Lake is the only stopover large enough to provide the massive quantities of food, specifically brine shrimp and brine flies, required to build up the energy reserves necessary to complete their 6,000-mile flight back to South America. Without this stopover, millions of birds would likely starve before reaching their breeding or wintering grounds.

Several species rely on the Great Salt Lake so heavily that the collapse of the lake's ecosystem would result in catastrophic population crashes. The lake supports a staggering number of up to five million Eared Grebes, representing between 50% and 90% of their entire North American population. The lake also supports 40% of the global population of Wilson's Phalaropes, who require the

lake as a temporary home while they undergo their pre-basic molt before continuing their migration. 50-60% of the global population of American Avocets utilize the lake as a breeding ground, along with ~25% of the continental population of Snowy Plover. These birds depend on the lake's unique ecosystem to provide predator-free nesting islands and an abundant invertebrate food source that neither freshwater lakes, nor the coast, can duplicate.

If the Great Salt Lake continues to dry up, the consequences for the Pacific Flyway would be dire. As water levels drop, salinity increases to toxic levels that kill off the brine shrimp and flies, effectively removing the food source for the millions of birds which require the lake. In recent years the receding waters have turned nesting islands into peninsulas connected to the mainland. This had led to the exposing of eggs and chicks to land predators like coyotes and foxes, decimating the populations of American White Pelican and other shore and water birds. Historically, populations using the Pacific Flyway had options for refueling.

Tulare Lake and Owens Lake of California, Winnemucca and Walker Lakes of Nevada, Lake Abert in Oregon, and Sevier Lake in Utah have dried up in the past century, resulting in the loss of nearly 1,400 square miles of water and wetland. Because there are no alternative wetlands in the West capable of absorbing such vast numbers of birds, the loss of the Great Salt Lake and Great Salt Lake Basin wetlands would lead to a flyway collapse, causing significant declines and potential extinction for the species that rely on it most heavily.

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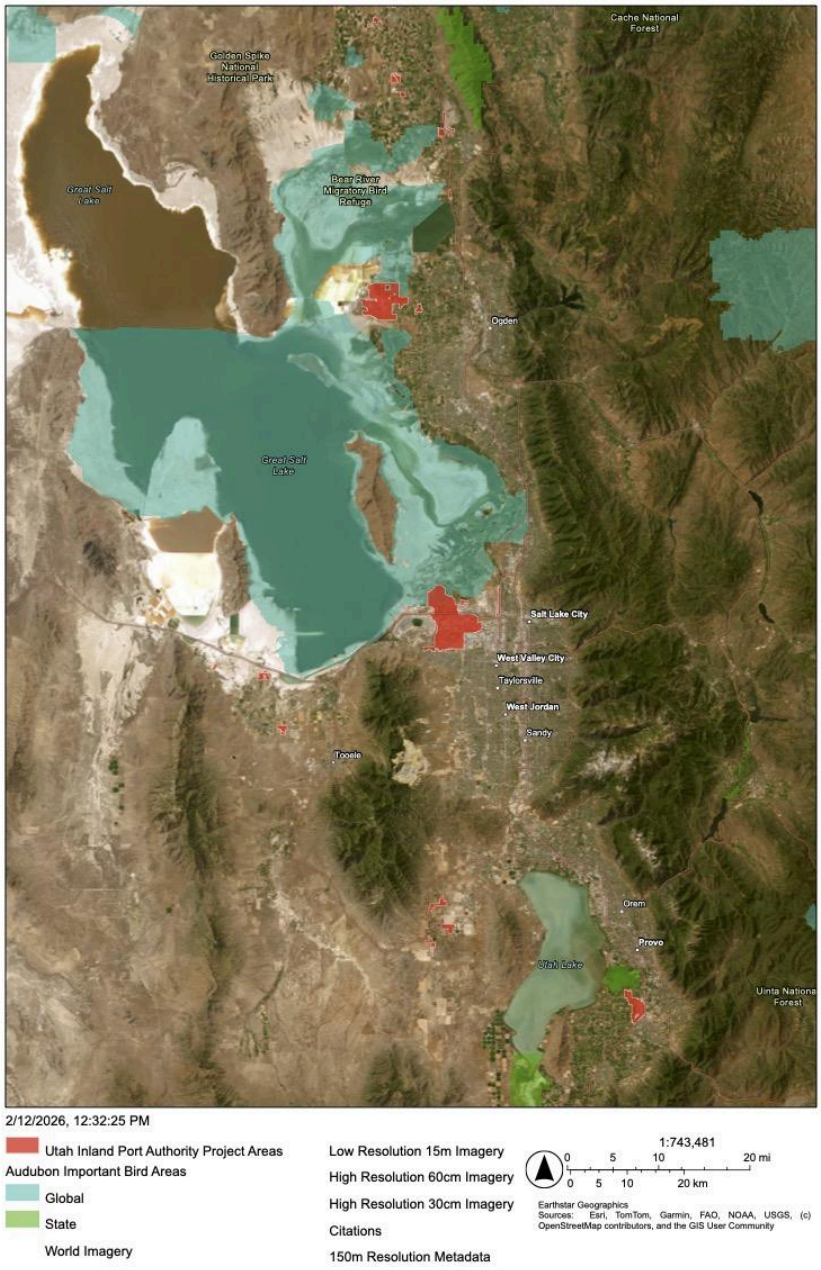
## UTAH INLAND PORT AUTHORITY PROJECTS IN THE GREAT SALT LAKE BASIN

Below are descriptions of each UIPA project area in the Great Salt Lake Basin, the type of development intended, what is known about water resources in the area, and policy recommendations.

UIPA Great Salt Lake Basin Project Areas

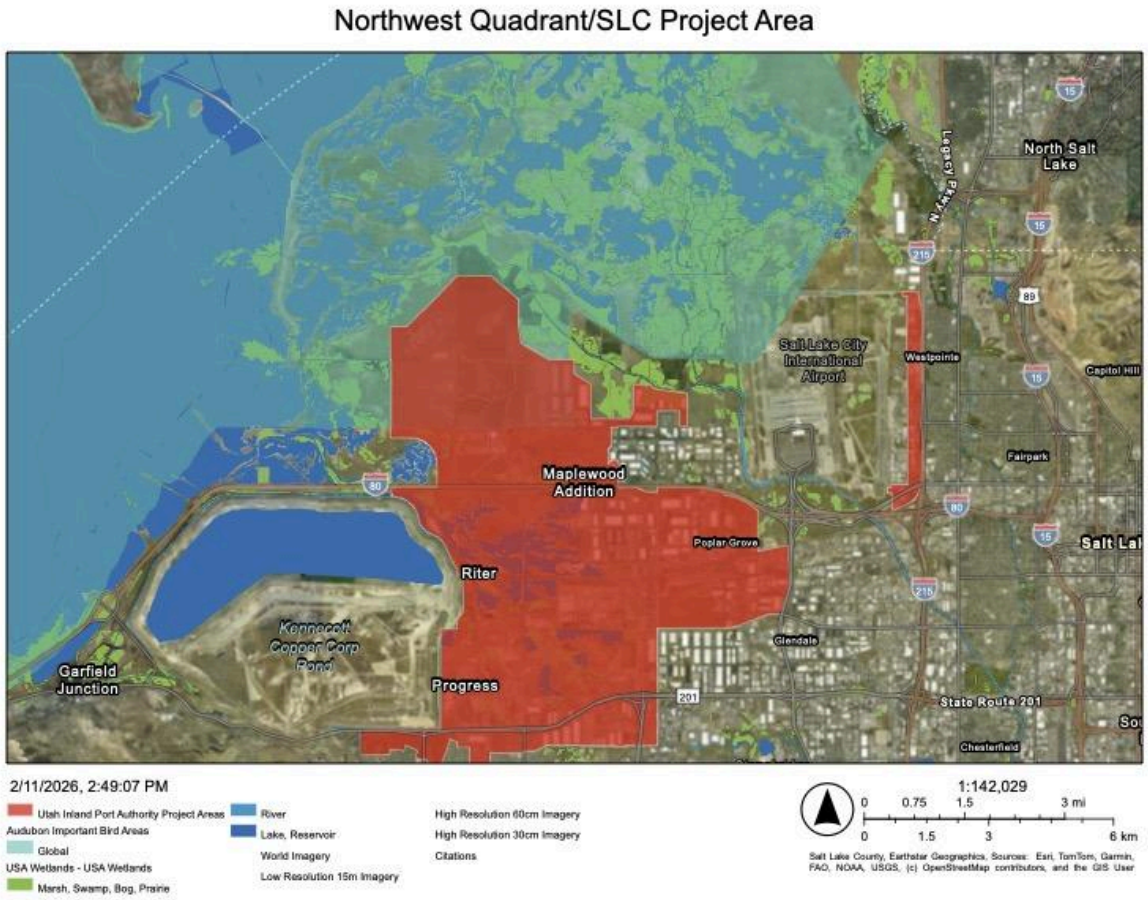



## Salt Lake County

The Northwest Quadrant Inland Port Project Area was the first ever created by UIPA. It is in Salt Lake County in the Utah Division of Water Rights (UDWR) Area 59.

The project area has a high water table and is 1.5 miles from the Great Salt Lake's official boundary. Over 26,588 acres of wetlands could be harmed by this industrial development.

There is the potential for 152 million square feet of new warehouse development, which in addition to having significant impacts on water quality, will also impact water quantity.




The UDWR states that in Area 59, "all surface waters are fully appropriated," and "the groundwater resource of this area is very limited."

As a result of development pressure, the warming climate, and persistent drought, Salt Lake City's water supply is more uncertain, leading the City to propose conservation policies which are working their way through the approval process. As these would be adopted as part of the state-required "General Plan" for cities, the intent is that they guide policy.

Because of the haphazard creation of the project area and UIPA in general, significant public resources have been wasted here. UIPA rushed to enter into a sole-source contract for a poorly thought-out logistics program which was then abruptly terminated by UIPA, resulting in the contractor successfully suing UIPA for $4.2 million in costs and $457,000 in damages. Another failed project and sole-source contract forced UIPA to pay $120,000 per month to lease property that no longer had a purpose. UIPA funds are now being used to remediate the old North Temple Landfill.

Little has been done in response to concerns about environmental impacts, which include increased vehicle traffic (particularly diesel-fueled vehicles) and the traffic and pollution from those vehicles, stormwater pollution, noise pollution, light pollution, and loss of wetlands, open space and wildlife habitat.

Salt Lake City's 2016 Northwest Quadrant Master Plan named mitigation measures that have not occurred, such as creation of a 400 foot eco-industrial buffer:

> Areas within 400 feet of the Natural Areas and other environmentally sensitive lands will have additional development standards to help mitigate impacts on the natural areas. Incentives should be created for developments outside of the 400 feet area to encourage design that lessens impacts to the environment.[6]

Other requirements in the Master Plan that have not been met include: "Protect water quality and availability" and "Maintain, repair, renovate, and improve the banks of the Goggin Drain to prevent further erosion of the banks."[7]

In addition, the Master Plan stated as goals these things that aren't occurring:

- Encourage the protection of the natural areas as a critical location of the global flyway for migratory birds. A flyway is the route between breeding and wintering areas. Continue to work at local, regional, and international levels to protect ecosystems along flyways. Support a collaboration of mechanisms for flyway conservation, both regionally and globally.

[6] https://www.slcdocs.com/Planning/Projects/NorthwestQ/NWQ.pdf p.25
[7] Salt Lake City Northwest Quadrant Master Plan p. 34

- Discourage loss and degradation of high-functioning Great Salt Lake wetlands within the Northwest Quadrant.
- Incorporate bird-friendly building design guidelines for the areas where development is allowed north of I-80.
- Appropriate industrial and office uses to buffer natural resources.
- Promote pollution control equipment on all buildings and for all industrial/manufacturing uses.
- Restrict storm runoff from parking lots flowing directly into natural areas, wetlands, and green corridors.
- Use Best Management Practices (BMPs) to improve run-off water quality
- Utilize appropriate buffers and landscapes, including bioswales, to limit the impact development has on natural areas and green corridors[8].
- Establish eco-industrial development standards for areas within 400 feet of the Natural Areas.
- Reduce noise from new and existing development in the area
- Provide incentives for development that utilizes on-site renewable energy sources, such as solar, wind, biomass and low-impact hydro or geothermal energy. Consider a shared heating and power generation system for the area.
- Allow solar farms and panels as principle uses and on the rooftops of buildings, over parking areas
- Restore Bailey's Lake

**Mitigation Measures that have Occurred**

The state of Utah recently purchased the former Blackhawk Duck Club property. Now known as the Blackhawk Waterfowl Management Area (WMA), it is located in the "natural area" to the north of the UIPA Project Area. None of the other conservation-related purchases discussed have happened. For years, UIPA has been in a planning process that is supposed to address issues related to baseline conditions and mitigation measures.

**Policy Recommendations:**

- Adoption/implementation of requirements already named in NW Quadrant master plan
- Creation of eco-industrial buffer as described in the Northwest Quadrant Master Plan
- Implementation of highest-standard stormwater pollution prevention

[8] Salt Lake City Northwest Quadrant Master Plan, Policy DA-1.3.

- Restoration of the Bailey's Lake area
- Adoption of draft SLC water conservation plan amendment that adds conservation policy goals to the general plan
- Lower cap on daily water use by businesses
- Protection of wetland playa in surrounding areas such as Northpoint

**Utah County**

Utah County contains two inland port project areas, one in Spanish Fork and the other in the Cedar Valley, including Fairfield and Cove Fort, and another unit in Payson. All of these areas are undergoing tremendous growth, and portions of the county are dependent on groundwater. Utah County is closed to new water appropriations.

According to Utah County's General Plan adopted in December 2020, the "two major concerns of water in Utah County are sufficiency and quality." The plan notes that Utah County water comes mostly from outside the county, including inter-basin transfers from the Weber River and tributaries of the Colorado River. It also warns, "Population growth in Utah County will be dependent on additional wells from underground aquifers since little additional water can be obtained from existing captured spring flows."

The 1995 Utah/Goshen Valley Ground-Water Management Plan notes, "The total annual inflow to Utah Lake is about 725,000 acre-feet. Of this amount, about half is from groundwater sources."

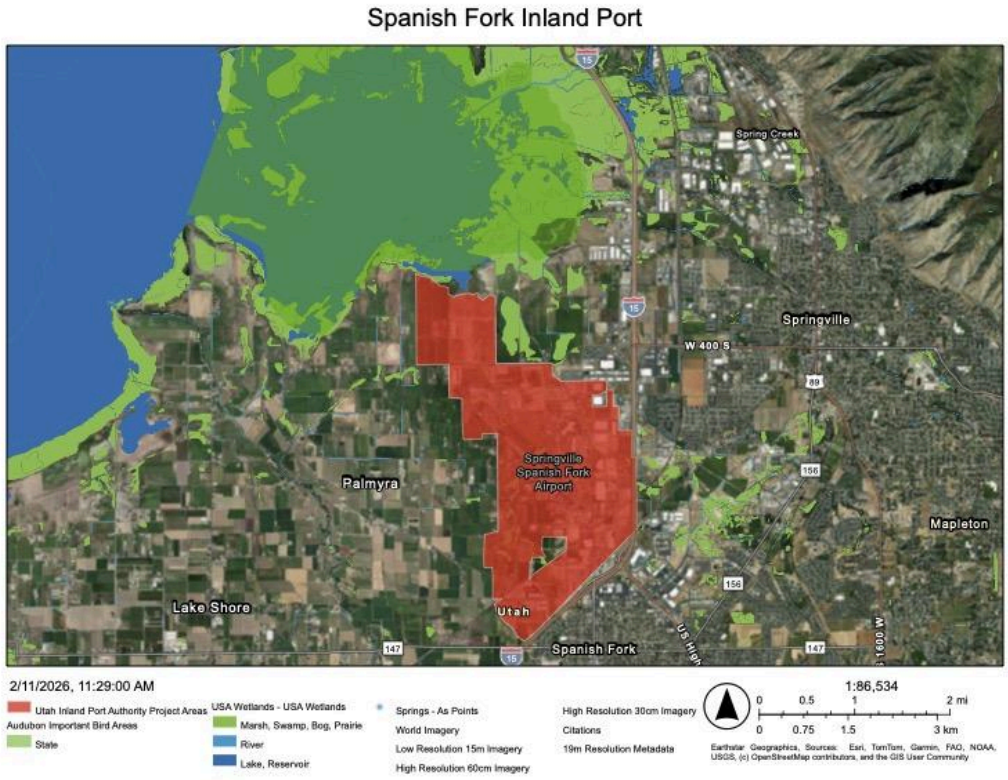
It also states :

> The USGS has constructed two groundwater models; one for Northern Utah Valley and the other for Southern Utah and Goshen Valleys. The Division of Water Rights has used these two models and other data to investigate the relationship between surface and groundwater sources. These investigations support the conclusion that every acre-foot of well water consumed in Utah/Goshen Valley causes the loss of an acre-foot of water discharging to Utah Lake. Thus, the development of ground water in the basin will affect the quantity of water available to surface water rights, particularly during drought periods.

**Spanish Fork "Verk" Inland Port Project Area on Provo Bay (Area 51):**

Spanish Fork, a city of approximately 48,000 people on the southern end of Utah Lake, is currently a focal point for industrial development, subsidized by

taxpayer money funneled through UIPA. UIPA estimates that over the next 25 years, it will collect as much as $160,300,000 in tax increment, and millions of that will be distributed to industrial developers as tax breaks and other subsidies. As a result, millions of square feet of polluting and potentially water-guzzling industrial development will be built in this relatively small city.




**What is planned:**

Currently 2,600 acres of Spanish Fork have been designated as a UIPA project area. Up to 10 million square feet of industrial warehouse space is being constructed, with the potential for over 29 million square feet of industrial development, which could generate as much as 40,000 additional vehicle trips per day. The scale of paving and construction involved in this development will impair or eliminate approximately 3,800 acres of wetlands.

**Water issues:**

The Spanish Fork 2025 Water Conservation Plan states that the city is experiencing "above-average residential, commercial, and industrial growth" and that it will "put a strain on the water supply and delivery system." It also claims that "these increased demands can be met through careful planning and

efficient water use." The city reports having 33,376 acre feet (AF) in available "water rights," but that is not the same as actually having that amount of water.

There are two main problems with Spanish Fork's assumptions about the future availability of water:

1. Groundwater Uncertainty: Drinking water is coming from groundwater sources, and there are serious questions about the availability of those sources continuing at anticipated levels, so the city may be overestimating 15,191 AF being available.
2. Colorado River Dependence : Approximately 84% (6,508 AF) of the city's secondary water comes from the Colorado River Basin, with the rest coming from groundwater sources. Yet Spanish Fork is still basing its projections on access to 12,404 AFY of Colorado River Basin Water, a resource that is becoming increasingly uncertain.

Besides the shrinking availability of water, the Spanish Fork Inland Port Project is situated next to Utah Lake's Provo Bay, an area that has been designated as a "Utah Important Bird Area." The project sits about half a mile from habitat for the June Sucker, a species which was listed as endangered and, due to successful intervention, is now listed as threatened (a less severe category). Putting polluting industrial uses next to this area of Provo Bay and Hobble Creek could undo all the progress made in saving the fish. As noted above, groundwater models created by Utah Division of Water Rights show that groundwater consumption in the area reduces the amount of water discharging into Utah Lake.

**Policy Recommendations:**

- Creation of a water budget that does not depend on additional Colorado River water
- Detailed wetland preservation and mitigation plan that takes into account June Sucker habitat restoration
- Creation of industrial buffer zones
- Prohibitions on intensive water use
- Adoption of all mitigation measures listed for the NW Quadrant in Salt Lake City

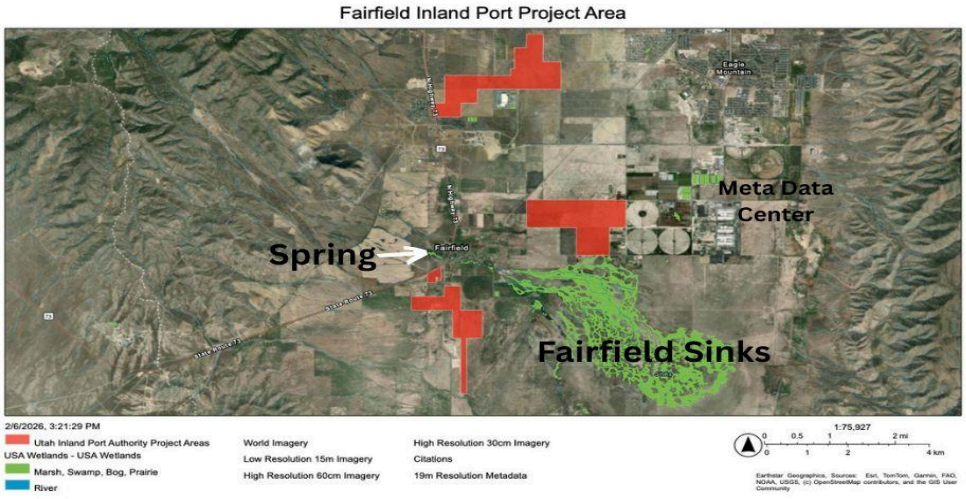
**Cedar Valley "Pony Express" Inland Port (Area 54)**

The second project area in Utah County is the Cedar Valley Project Area, branded as the "Pony Express" area.

The combined Pony Express Project Area comprises approximately 1,700 acres and consists of two zones with multiple noncontiguous areas, in Cedar Fort and Fairfield, and a newly created area in Payson.

Using taxpayer resources, the Utah Inland Port Authority (UIPA) is incentivizing industrial development in Utah County's Cedar Valley, an area facing serious water quantity and quality problems, and which also contains significant wetlands.

The Cedar Valley contains the rapidly growing municipalities of Fairfield, Eagle Mountain[9], and Cedar Fort.[10] Groundwater resources in the Cedar Valley aquifer are limited and water rights may be overallocated.




Pollution from historic mining operations in Manning Canyon in the Oquirrh Mountains has contaminated soil and water in Fairfield. And, the town contains a significant area of Great Salt Lake Basin wetlands which are threatened by the dewatering of the aquifer and replacing land with asphalt and concrete.

[9] Eagle Mountain population ~60,000, incorporated in 1996.
[10] Fairfield population 180, incorporated in 2004, formerly the site of Camp Floyd.

As previously mentioned, Fairfield Town has received a low-interest loan from the UIPA Infrastructure Bank to drill a new well and build a water line for a new data center. According to Fairfield's May 2025 Master Water Pla the town currently provides water for 27 Equivalent Residential Units (ERU). The newly approved "east" data center needs 800 ERUs in the short term and 1,122 at full buildout. In 10 years, the town is expected to increase its ERUs to 2,020 (see chart below).

**Table 2-2**
**Buildout ERUs**

| Area | Existing ERUs | 10-Year ERUs | Buildout ERUs |
|---|---|---|---|
| Residential | 27 | 396 | 989 |
| Industrial (Other than East Data Center) | 0 | 800 | 634 |
| Commercial | 2 | 20 | 830 |
| Institutional | 4 | 4 | 6 |
| East Data Center | 0 | 800 | 1,122 |
| **Total** | **33** | **2,020** | **3,581** |

**Lack of water in the Cedar Valley Aquifer**

A 2012 report (based on 2007 data) by the Utah Geological Survey found that the Cedar Valley Aquifer is facing major stress and isn't being fully recharged due to rapid development, setting up a scenario for significant drawdown of the aquifer.

> If 2007 pumping and average climatic conditions persist, the model predicts most areas of the basin-fill aquifer will experience as much as 15 feet of drawdown from 2007 levels. In scenarios that include doubling the 2007 well extraction rates, large areas of the valley are predicted to experience over 100 feet of drawdown, and the northeast corner of the valley, where recent bedrock wells have been developed for municipal use, generally would experience even greater amounts of drawdown.

In the 19 years since the UGS data was collected, development has exploded.

**Mine tailings pollution**

Development in Fairfield is also complicated by mine tailings pollution from Manning Canyon's historic mining operations. A Public Health Assessment was conducted in 2011which:

> "evaluated the health risks to Fairfield residents and visitors from contaminated mine tailings that have moved off-site into surface water, sediment, soil, and air originating at the Manning Canyon abandoned mine site. During years following the mill closure, tailings impoundments were breached, resulting in the migration of mine tailings into the town of Fairfield. Erosion due to flooding and heavy rains resulted in movement of tailings into streams, roads, and properties in Fairfield. The Manning Canyon tailings contained elevated levels of arsenic, mercury, lead, thallium, and other metals."[11]

The situation is so alarming that Fairfield enacted a Soil Ordinance "to identify areas of soil contamination, including arsenic, within the boundaries of Fairfield Town, define hazardous levels, and set standards and procedures to mitigate potential health risks from exposure by disturbance, movement of soil, or the habitation of these areas."

The ordinance states:

> The Town is aware that contaminated soils exist and have been deposited throughout the Town due to runoff from mines, relocation of tailings, as well as other means of movement. The Town, however, does not know where all contaminated properties may be located. Each property owner is responsible for the condition of his or her own property and is also responsible for any remediation or actions required by this Soils Ordinance regarding his or her property.

**New mining plan**

In December 2025, Revival Gold announced that it planned to acquire 100% of Barrick Mining Corporation's interest in the Mercur Gold Project at the top of Manning Canyon, "marking a significant step forward on the path to re-starting production." They reported that they were starting the permitting process with the Utah Division of Oil, Gas and Mining.

**Wetlands impacts**

The Cedar Valley is an important part of the Great Salt Lake Basin ecosystem. Over 200 species of birds have been observed in the Cedar Valley, including

[11] https://appletree.utah.gov/wp-content/uploads/Fairfield-DOH-PH-assessment-final-sept711.pdf

Wilson's phalarope, eared grebe, white faced ibis, bald eagles and avocets, to name a few.

The "Sinks" (sometimes called the Fairfield Sinks) are a component of the Pacific Flyway, and are very imperiled by the drawdown of the aquifer and the drying up of Fairfield Spring, which is a water source for the town with a hydrological connection to the sinks. They are also endangered by new industrial development, including a proposed subsidized "air park" next to them. The majority of the sinks area is owned by the Corporation of the Presiding Bishop of the Church of Jesus Christ of Latter-day Saints.

The Fairfield General Plan notes, "a significant portion of Fairfield has been designated by the United States Geological Survey as Wetlands." What this means in the future in terms of federal protection is unclear. But regardless, the property owners, the town and the state of Utah need to create a protection plan that ensures the health of this irreplaceable resource.

**Policy Recommendations:**

1. Up-to-date study of water resources,
2. Creation and implementation of a plan to restore and preserve the biological health of the Fairfield Sinks
3. Assessment of the cumulative impact of proposed development throughout the Cedar Valley, such as warehouses, mining in the Oquirrh and Lake Mountains, data centers, small modular nuclear reactors, as well as mitigation measures.

The Fairfield inland port project area is next to Eagle Mountain and includes a 4.5 million square foot Meta Data center slated to receive up to $750 million in subsidies. Developers claim the center will use less water than other data centers, but will not say by how much.

Eagle Mountain has been discussing annexation of additional property to accommodate more data centers as well as development of "small modular nuclear reactors."

According to Eagle Mountain's 2024 Water Conservation Plan, the city sources most of its water from seven wells, one of which is not in operation. The plan states two more wells are under construction.

According to the plan,

> The rapid growth of Eagle Mountain has led to a rapid demand of potable water. Even though Eagle Mountain has high yield wells and an agreement with Central Utah Water Conservancy District to wholesale water to the City, the City is still below its source requirement.
>
> Due to Eagle Mountains geographical location, there are limited water resources to pull from; there are no rivers, streams or springs that can be used for drinking or irrigation water. The only water resources to the City are deep wells and wholesale water piped in from Central Utah Water Conservancy District.

Neighboring Saratoga Springs, just outside the Cedar Valley next to Utah Lake, also has water resource problems. The city relies on groundwater and water from the Central Utah Water Conservancy District (CUWCD).

The Saratoga Springs Water Conservation plan states:

> It is evident that alternate water sources will need to be developed to meet the long-term water service needs of the City. There is currently a moratorium in place on the transfer of surface water rights to groundwater points of diversion in water right areas 54 and 55 (Salt Lake Valley and Utah Valley). Physical groundwater availability is also becoming an issue. Even if additional groundwater rights were available, the physical water may not be.

It mentions further, “The City plans to increase future supply for the secondary system by utilizing deep groundwater sources from the Utah Lake aquifer and may also utilize reclaimed water.” This raises critical questions about serious impacts these actions will have on Utah Lake water levels.

The Conservation Plan notes:

> In recent years, the City has had to reduce pumping in Wells #4 and #6 due to water levels that have dropped too close to the pump intakes, ultimately causing water quality issues. During the dry summer months (June to September), the aquifer from which these wells are pumping water is exceedingly stressed. To meet demands while alleviating the

water level issues in the wells and reduce the stress placed on the aquifer, Saratoga Springs supplements its water through CUWCD.

It also describes the challenges of "limited water available within the Utah Lake aquifer (main source utilized) and a growing population and associated demands."

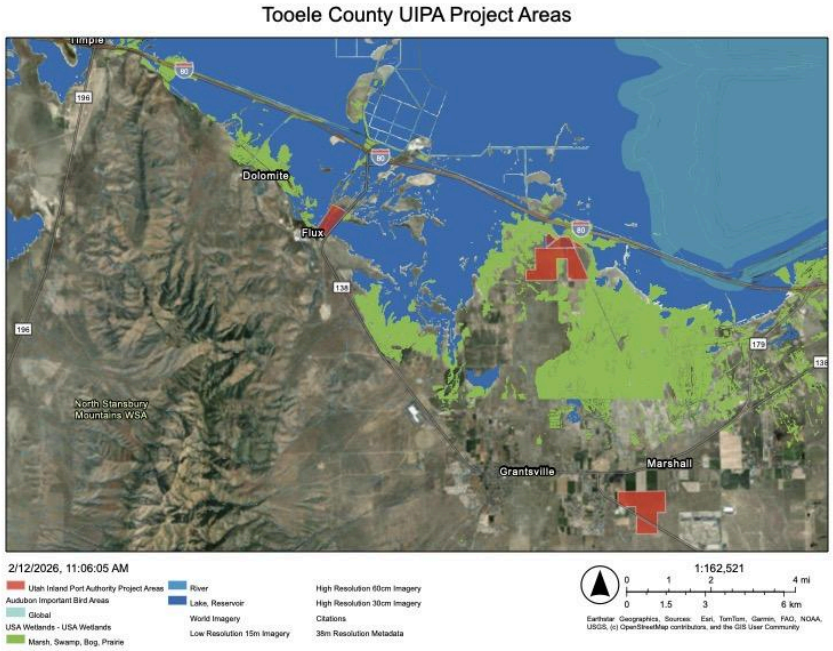
**Policy Recommendations:**

- Water budget for Cedar Valley
- Cooperation with Utah Lake Authority and land conservation organizations to conserve and preserve key undeveloped wetlands in the Cedar Valley and at the southwestern end of Utah Lake.
- Eco-industrial buffer, dark skies lighting, (all the Northwest Quadrant mitigation measures)
- Required analysis of the impacts of proposed development, such as warehouses, critical minerals mining, data centers, small modular nuclear reactors

**Tooele County (Area 15)**

Tooele County is another of the fastest growing counties in the state, yet the valley does not have the water to support its growth. The county's water resources come from wells drilled into the aquifer in the Tooele Valley. This aquifer urgently needs further study as it is connected to Great Salt Lake. It is possible that water rights in the Tooele Valley are over-allocated. Residents have reported that their wells are running dry. In spite of this significant challenge, UIPA is using its financial tools to fast track massive new industrial development.

There are two project areas in Tooele County.




The Tooele Valley Project Area is on land owned by Zenith Bolinder LLC, an entity including the father and uncle of Utah State Representative Bridger Bolinder. This publicly subsidized industrial development, which could be significantly water intensive, began construction in an area next to Great Salt Lake situated within 12,000 acres of Great Salt Lake wetlands. In addition to the destruction of wetlands, industrial development next to the lake will create significant amounts of stormwater pollution. In spite of this, the state of Utah is allowing developers to use a septic system, and they announced plans to build a power plant next to the wetlands and the Lake to provide energy for a data center complex. The company's plan to mitigate wetland harm was to construct a bridge over wetlands to be used by heavy trucks, but that never happened; instead they have a road that is slightly narrower.

The 20 Wells Project Area in Grantsville consists mostly of the Lakeview Business Park owned by the Romney Group.

Together, these project areas will generate approximately 54,000 new vehicle trips in Tooele County, with some of that new traffic intended to be funneled through Tooele City into Eagle Mountain and Saratoga Springs.

**Water issues:**

It is likely that water resources in the Tooele Valley are overallocated. The area is entirely dependent on groundwater, yet no recent hydrological study of the Tooele Valley aquifer has been completed. It is important to note that no county-wide water conservation plan has been developed for this rapidly growing area.

A report by the Utah Geological Survey explains the potential impacts of development and climatic conditions on wetlands in Tooele County. Sub-titled "A Valuable But Potentially Endangered Resource," it states, "The wetlands in Tooele Valley are in the northern part of the valley near Great Salt Lake and occupy about 79,000 acres, or almost 50% of the valley floor area." The report concludes, "Wetlands in Tooele Valley are potentially endangered from drought and increased development, which could reduce the amount of water they receive."

The U.S. Geological Survey published an illustrated report of groundwater resources in Tooele Valley, Utah in 2009. It stated, "Groundwater provides much of the water supply for residents of Tooele Valley. The protection, development, and wise management of groundwater resources are important to support community growth and to ensure the continued availability of groundwater for all users."

Although Tooele County has not adopted a water conservation plan as part of their general plan, Tooele City completed its plan in 2021, with a goal of reducing water consumption by ten percent.

A 2021 report by ABC4 featured Tooele County residents who were concerned about new growth in the area. Residents expressed worries about the "effects on infrastructure, quality of life, and already scarce water resources."

In 2023, the Deseret News reported that "the town of Stockton in Tooele County is under a building moratorium because it is running out of water and needs $2.4 million from the Utah Legislature for a new well," One of the causes was that the mountain springs had run dry.

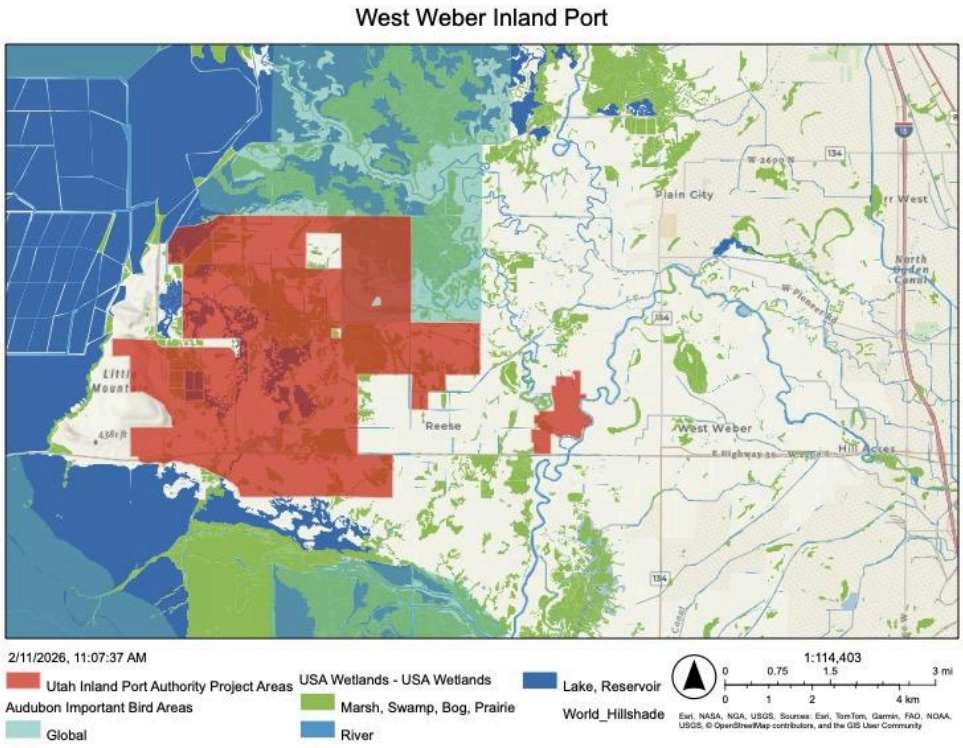
**Policy recommendations:**

- Ground water aquifer study
- Development of water budget
- Wetlands protection plan in place

- Limits on new industrial water use
- Adherence to all  NW quad recommendations

**Weber County (<u>Area 35</u>)**

In August 2023 the Weber County Commission passed a resolution supporting a 903-acre inland port project area next to Great Salt Lake. On January 2, 2024, they passed a resolution expanding the project area to 9000 acres, and in May 2024, UIPA created the West Weber Project Area. All of this industrial development will be wedged between two state-funded wildlife management areas.




The West Weber Project Area consists of 9,000 acres primarily next to Great Salt Lake and between the 11,430-acre Harold Crane Wildlife Management Area and the 20,000-acre Ogden Bay Wildlife Management Area. Utah has invested millions of taxpayer dollars in both areas, and it almost goes without saying that fast tracking industrial development next to them will harm existing resources. A conservative estimate is that 29,000 acres of wetlands will be harmed.

As many as 98 million square feet of warehouse space could be built in this area, generating tens of thousands of additional daily vehicle trips. "Prospects span industries such as advanced manufacturing, light industrial, data centers, energy, and build-to-suit operations." Weber developers are set to receive $360,800,000 in tax breaks to subsidize the development as well as low-interest loans.

The area slated for development is facing water resource challenges and is subject to the conditions of a groundwater management plan known as the 1995 Groundwater Management Plan for the Weber Delta Sub-Area.

Surface water in the West Weber area comes from the Weber River and its tributaries, but most of the water used comes from groundwater. Several water providers in the area are raising concerns, including the Taylor-West Weber Water Improvement District Plan:

> The District's sources of water come from purchasing water from Weber Basin Water Conservancy District and also pumping from wells located in the District which are tapped into underground aquifers. We are watching our well sensor equipment daily and the data is showing a significant decrease in aquifer levels. It is very concerning that the underground aquifers are dropping just like the lakes and reservoirs.

While discussing groundwater issues at the 7/9/25 meeting of the Great Salt Lake Advisory Council[12], the representative from the Weber Basin Water Conservancy District discussed water resources challenges in the area.

He noted "significant declines in groundwater" over the last 50 years, explaining that "it's difficult to continue to have groundwater wells work effectively; things are always breaking when you're pulling water out of the ground like that. terribly expensive, and it takes a lot of mechanical devices to make that happen, and mechanical devices inherently fail."

He reported that wells close to the source of surface water, such as along the Weber river, have not declined, but farther away from the river systems you "see the degradation." He added, "As you get closer to the lake, obviously Woods Cross has huge subsidence issues, and we know that's from overpumping of the ground water."

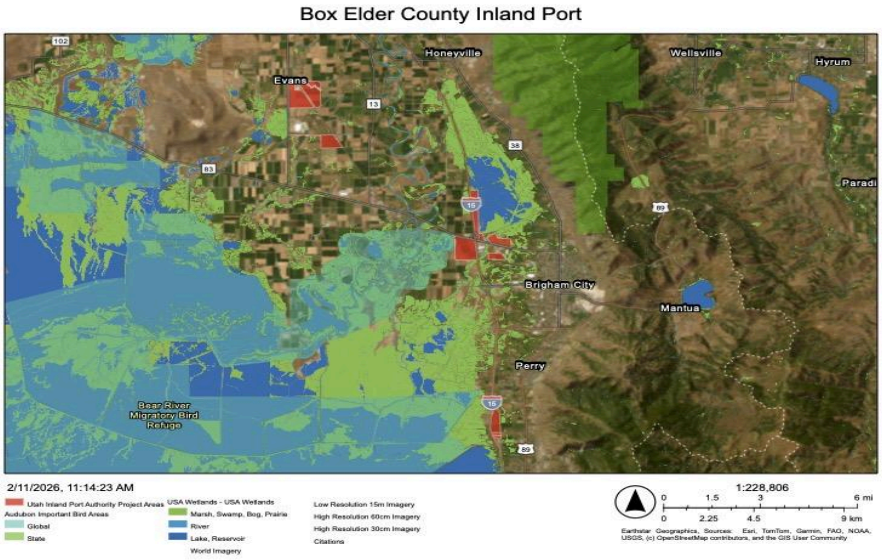
[12] Starting at minute 44:00 on the tape.

**Weber Policy Recommendations:**

- West Weber Basin Groundwater study
- Development of water budget
- Special analysis of impact to wetlands
- Specific wetland protection plan
- Adherence to all NW Quadrant requirements

**Box Elder (Area 29)**

In August 2023, UIPA approved several locations for project areas in Box Elder County, with one location half a mile from Bear River Migratory Bird Refuge, and a Globally Important Bird Area and another with the Malad River running through it. Project areas in and adjacent to wetlands have expanded. The Golden Spike Project Area now encompasses 2,140 acres with several noncontiguous areas in the critical Bear River Basin, which is a major water source for Great Salt Lake and contains the Bear River Migratory Bird Refuge.




The development area in Brigham City will bring industrial development next to the Bear River Migratory Bird Refuge, an “Important Bird Area” of global significance.

Another development area is designed to benefit Bailey Farms International, an international alfalfa export company.

Golden Spike developers are slated to receive $192,810,000 in tax breaks. UIPA says that 3% of the property tax differential collected will be available for "wetland mitigation," potentially amounting to $5,265,000. There isn't specificity on the part of UIPA with regard to how this money might be spent, but it's clear in their environmental report [p.73] that:

"It is recommended to determine whether project area is likely to adversely affect threatened, endangered, proposed threatened, and proposed endangered species in the project area." As several of these project area locations are next to a "Globally Important Bird Area," it is critical this analysis takes place before development occurs.

Box Elder County is working with the Bear River Water Conservancy District to create a County Water Master Plan (CWMP). The publicly available draft of the plan focuses heavily on preserving existing agricultural water rights.

**Policy Recommendations**:

- Special analysis of impact to wetlands/Bear River Migratory Bird Refuge
- Specific wetland protection plan
- Adherence to all NW Quadrant requirements

## Conclusion

Utah Inland Port Authority taxpayer subsidized industrial development is slated for undeveloped lands throughout the Great Salt Lake Basin, much of which is in, or next to Great Salt Lake basin wetlands, and/or next to the lake, and in areas with water resource constraints. Allowing this development to continue unfettered will make it harder to save the lake and wetlands.

For Northern Utah to remain a healthy and desirable place to live, the Great Salt Lake must be healthy, and to be healthy, it needs far more water than it is currently receiving. The Great Salt Lake Strike Team estimates that the GSL needs an additional inflow of almost 800,000 acre feet of water per year every year to reach a minimum healthy level of 4198 feet and reduce the hundreds of square miles of desiccated lake bed now exposed and creating major health issues for Utahns in the form of airborne dust.

Also, Great Salt Lake supports much more than humans. Over ten million migratory birds per year depend on Great Salt Lake for food, and due to the steady aridification of the Great Basin, it's the main location large enough to provide the massive quantities of food, specifically brine shrimp and brine flies, required by many species to build up the energy reserves necessary to complete their 6,000-mile flight back to South America. Loss of Great Salt Lake means the threat of extinction for these birds.

Utah is an exceptional place, with some of the most beautiful, unique lands in the world, and community oriented people drawn to living in this place. By working together and establishing reasonable measures to protect our most precious resources including our water, air and land, we can accommodate new development that doesn't destroy our quality of life.

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