

To: State of Utah Division of Water Quality

From: □ □ Susan Holmes, Chair Central Davis Sewer District

□

Central Davis Sewer District wishes to provide the following comments on the proposed changes to R317-1 and R317-2. □

□ □ □ □ □ □ □ □ □ □ **Antidegradation Changes**

The District does not believe that EPA's rejection of the current antidegradation proposal is necessary at this time. □ By responding prematurely to the Kentucky Court decision, EPA has asked Utah to develop programs for the State for which EPA has not yet developed guidance. □ Regardless of this premature action, The District does support a measured approach to implementation of Level 2 reviews. □ As such, the changes proposed in R317-2-3.5(b)(1) which allow for the use of design concentrations and flow as the baseline is a reasonable process. □ Therefore we support this change. □

**Class 3D Footnote 2a Dissolved Oxygen and pH Change of Applicability**

The District supports the removal of DO and pH standards from impounded wetlands of the Great Salt Lake classified as 3D. □ We believe these standards were improperly applied from the first time the standard was imposed. □ In addition, we believe that many of the other 3D water quality standards are not applicable to Great Salt Lake impounded wetlands. □ The Great Salt Lake wetlands are highly managed and have some metals concentrations which exceed source water concentrations. □ However, these impounded wetlands could be concentrating through evaporation or could be adding metals from the sediment. □ In either case, it is most likely that these conditions have existed continuously since 1975 and have never complied with the 3D standards. □ We recommend that the State conduct a use attainability study to determine if the standards are appropriate since these constructed ponds are not natural features and should only be protected to the existing uses they have.

Thank you for the opportunity to comment on the proposed rules. □

--

Susan Tanner Holmes  
369 S 650 W  
Farmington, UT 84025  
801-661-5659