

From: Gregory Williams
To: dwham@utah.gov; wmoellmore@utah.gov
CC: Craig Miller; Eric Klotz; Todd Adams
Date: 8/20/2008 3:19 PM
Subject: Comments - Water Quality Standards proposed changes

To whom it concerns:

After a quick and final review of the proposed changes, I have the following comments, suggestions, etc. which are noted in bold font:

Since the wording "high quality" is being removed from all titles due to its nebulous nature with no specific standards, guidelines, and/or definition, it should also be removed and/or reworded within all the text. Some suggestions are as follows:

R317-2-3 Antidegradation Policy

3.1 - Waters whose existing quality is better than the established standards for the designated uses will be maintained at their **existing** quality unless it is determined by the

3.2 - Waters of **such a** quality which have been determined.....

3.5 - Antidegradation Review (ADR)

c. Antidegradation Review Process
2. Are there any reasonable.....

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- (o) - should be corrected as **(m)** to maintain alphabetical order

R317-2-12 Category 1 and Category 2 Waters

12.1.a
All surface waters.....
.....All **Category 2 Waters** as listed in R317-2-12.2.....

Miscellaneous general comments, corrections:

R317-2-12 Category 1 and Category 2 Waters

- 12.2
 - a. Green River Drainage
 - b. Deer Creek Reservoir**
 - c. Electric Lake

R317-2-13 Classifications of the Waters of the State (see R317-2-6)

13.11 National Wildlife Refuge.....,and other **Regulated** Areas Associated with the Great Salt Lake.

13.12 (From the "Fact Sheet" it appears the intent was to increase the default size for classification. However, the original seems to have already said 20 acres and the current proposed change is to 10 acres. Has one or the other been reversed?)

R317-2-14 Numeric Criteria

Footnote (14) Last sentence should read:as a part of this standard. (not standards)

Along the same trivial note as the last suggestion:

- 1. Both hyphenated and non-hyphenated forms of "antidegradation" (anti-degradation) are used throughout the

document. It would be more consistent to use only one form.

2. The words criterion and criteria are used seemingly interchangeably. Strictly speaking, criterion is the singular form for the entire set or collection of information to base a judgement on. Criteria is the plural form that refers to a number of individual, separate bits of information. For the most part, the use of these words in this document have been reversed.

Thank you for the opportunity to comment, albeit very short notice.

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