

Metropolitan Water District of Salt Lake & Sandy

3430 East Danish Road, Cottonwood Heights, UT 84093
801-942-1391 Fax: 801-942-3674 www.mwdsls.org



November 3, 2008

VIA HAND-DELIVERY

DEPARTMENT OF NATURAL RESOURCES
WATER RIGHTS
1594 W. North Temple
Salt Lake City, UT 84116-3154

Re: Comments on Proposed Rule R655-16 Relating to Sole Supply for Supplemental Water Rights

Dear Mr. Olds:

Metropolitan Water District of Salt Lake & Sandy ("MWDSLS") submits the following comments on proposed Rule R655-16 -- Administrative Procedures for Defining Beneficial Uses for Supplemental Water Rights, published in the Utah State Bulletin August 1, 2008 (the "Proposed Rule").

MWDSLS provides a substantial portion of the water delivered by its two member cities, Salt Lake City and Sandy City, to their retail customers. MWDSLS's water supply comes from a number of sources which include the Provo River Project, certain water rights of its two member cities, the Little Dell Project, the Central Utah Project Bonneville Unit, and the Ontario Drain Tunnel. Each of these particular sources is supplemental to each other for purposes of MWDSLS operation and delivery, and to MWDSLS member cities' rights.

MWDSLS believes the Proposed Rule is flawed in many respects. MWDSLS agrees with the comments to the Proposed Rule submitted by the Provo River Water Users Association.

MWDSLS wishes to specifically emphasize the onerous nature and unnecessarily broad reach of the Proposed Rule. MWDSLS requests and recommends the Proposed Rule be modified to include critical exceptions for all municipal and industrial (M&I) uses, as well as for those water rights that support Utah's federal storage projects. MWDSLS looks forward to being an active part of this ongoing rulemaking process. Thank you for your attention to this matter.

Very truly yours,

Michael L. Wilson, General Manager

cc: counsel

987067v1

RECEIVED
NOV 03 2008 SN
WATER RIGHTS
SALT LAKE