



December 15, 2009

**HAND DELIVERED**

Kent L. Jones, P.E.  
Utah State Engineer  
Utah Division of Water Rights  
1594 West North Temple, #220  
Salt Lake City, Utah 84116-3156

Re: Comment on R655-16. Administrative Procedures for Defining  
Beneficial Uses for Supplemental Water Rights

Dear Mr. Jones:

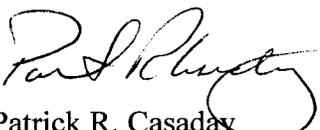
Thank you for the opportunity to comment on your proposed rule. Sandy City recognizes and appreciates your responsibility to quantify a particular water right's beneficial use when it is used supplementally with other water rights.

It was our understanding, based on discussions last year, that your office had intended to provide municipalities with a total exemption from filing the DIBUA form. Instead, as I read 9(4), this would be at your discretion. We would hope that an exemption for municipalities could be explicitly enunciated in the rule. We appreciate the efforts you have made in 8(1) to facilitate the process when a party either cannot be identified or located, or refuses to participate in completing the DIBUA form.

Sandy City participates with the Utah Water Coalition and shares its common concerns. As such, we also affirm and incorporate those points and concerns expressed by it, and other Utah municipalities, in their respective letters commenting on this rule.

Again, thank you for your consideration.

Very truly yours,

  
Patrick R. Casaday  
Attorney for Sandy City

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