



IDAHO CATTLE ASSOCIATION

October 3, 2014

Ms. Paula Wilson
Idaho Department of Environmental Quality
1410 North Hilton Street
Boise, Idaho 83706

Ms. Wilson,

The Idaho Cattle Association appreciates the opportunity to comment on the proposed changes to the mixing zone policy found in the Water Quality Standards at 58.01.02.060. The Idaho Cattle Association (ICA) represents numerous operations in the state of Idaho which this proposed change affects. For this reason, ICA is submitting comments on the behalf of cattle operations that may be adversely affected.

First, we feel the provision in 060.02, allowing "points of compliance" as alternatives to mixing zones, is a reasonable approach. However, as 060.02 has the potential to apply to storm water discharge, ICA recommends a specific provision allowing for storm water discharge mixing zones only if the requirements in 060.01 have been met.

The proposed changes to 060.01.d sets out to define "unreasonable interference" with, or danger to, beneficial uses. The proposed language of 060.01.d is concerning to regulated operations, as the language lacks clarity as to what technical demonstration "unreasonable interference" requires. ICA has the same concerns stated in comments submitted by the J.R. Simplot Company and the Idaho Association of Commerce and Industry, and supports and recommends consideration of the language suggested in said comments.

Again, ICA appreciates the opportunity to comment on this proposed rule, and appreciates the Idaho Department of Environmental Quality's consideration of submitted comments.

Sincerely,

Jared Brackett
President
Idaho Cattle Association