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IDEQ

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Paula J. Wilson
Hearing Coordinator
DEQ
1410 N Hilton
Boise, ID 83706-1255

Re: Proposed Rule Docket No. 58.0102-1001
Anti-degradation Implementation Procedures

Please accept these comments on behalf of Bennett Forest Industries, Riley Creek and Idaho Forest Group. As the owner of over 25,000 acres of forest land and 4 world class lumber manufacturing plants in Idaho, we are fully supportive of the rule recognizing that practices pursuant to the Forest Practices Act are "cost effective and reasonable BMP's for non-point sources".

We also offer the following perspective.

1) Any changes for future permit requirements covering forestry activities should be covered as part of baseline conditions and not as new permits. This could best be accomplished by clarifying the definition of existing activity or discharge.

2) We support including flexibility in the rule to allow for streamlined anti-degradation review in conjunction with any needed general permits in the future.

3) We have reviewed and support the September 30, 2010 comments submitted by IACI. We specifically feel SRW's need inclusion.

Thank you for the opportunity to comment and let us know if you have any questions.

A handwritten signature in green ink that reads "Robert Boeh".

Robert E. Boeh