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May 10, 2018

Jason Pappani  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706

RE: The Idaho Department of Lands Comments on Water Quality: Docket No. 58-0102-1703 Preliminary Draft 2 Rulemaking, Designation of Domestic Water Supply

Dear Jason,

The current rulemaking undertaken by the Idaho Department of Environmental Quality (DEQ) has a potential impact on implementation of the Idaho Department of Lands (IDL) regulations associated with the Idaho Forest Practices Act (FPA) rules (IDAPA 20.02.01). IDL supports DEQ's efforts to better clarify the definition of Domestic Water Supply and the specific water quality requirements that designated, public, water supply sources must meet.

IDAPA 20.02.01 indirectly demonstrates adequate protection for surface waters used for designated and non-designated, public and non-public, drinking water supply sources. The Forest Practices Act minimum Best Management Practices, associated with forest management, use ground-equipment exclusion zones to ensure the risk of sediment entry to streams is minimized. The Forest Practices Act Advisory Committee (FPAAC) supports the Idaho Board of Land Commissioners in FPA rulemaking through the IDL Director. By clarifying the turbidity requirements for monitored source water used to supply *any*, public, drinking water system, the IDL can ensure technical advice provided to the FPAAC and the Director is clear and appropriately guides FPA rule administration.

The IDL feels that the Draft 2 modifications to Section 252 eliminate redundancy, simplify the listing of designated, domestic water supplies and also clearly define the intake turbidity requirements for source water used for non-designated, public, drinking water systems. Furthermore, including a reference to the general water quality requirements in Section 200 (proposed 252.a) highlights additional requirements for public, domestic water supplies and clarifies those requirements that should be considered for application to other domestic water supply diversions used for drinking water.

Sincerely,

Ara Andrea  
Chief, Forestry Assistance Bureau  
Idaho Department of Lands

Cc: David Groeschl – Director  
Craig Foss – Division Administrator, Forestry and Fire  
Kennon McClintock – Forest Practices Advisory Committee Chair