



RILEY STEGNER AND ASSOCIATES

Jason Pappani  
Idaho Department of Environmental Quality  
1410 North Hilton St.  
Boise, ID 83706  
*Via email*

**RE: DEQ Rulemaking related to Domestic Water Supply. Docket 58-0102-1703**

August 31, 2018

Dear Mr. Pappani,

Thank you for the opportunity to comment on the proposed rule concerning Domestic Water Supply, Docket 58-0102-1703. I write on behalf of large timberland owners Stimson Lumber Company, Hancock Forest Management, and Molpus Woodlands Group, each of which is actively engaged in the planting, management, and harvesting of timber throughout northern Idaho.

We support IDEQ's efforts to update domestic water supply use designation in a manner that both protects surface waters used for public drinking water and supports the forest industry's efforts to conduct work safely and efficiently. Unofficial water diversions like a pipe placed in a stream by an individual without authorization should not qualify as domestic water supply. In our comment dated May 10, 2018, we expressed concern that the proposed draft language was ambiguous, and suggested that IDEQ use the term "public drinking water systems" to clarify that the rule does not apply to a single diversion for drinking water supply for private use as an existing DWS use, consistent with the SDWA and IDEQ's April 2018 Discussion Paper.

Despite IDEQ's decision not to incorporate our recommended language as a solution, and though we believe clearer and more consistent language within DEQ's rules would have provided needed guidance and predictability for forest owners, we support this proposed rule to the extent that it will not impose DWS designations on unauthorized single diversion water supplies for private use.

Again, thank you for the opportunity to comment. Please do not hesitate to contact me if you have any questions or would like to discuss these comments further.

Sincerely,

Emily McClure