



601 West First Ave.
Suite 1600
Spokane, WA 99201
www.potlatchcorp.com

September 21, 2017

Ms. Paula Wilson
Idaho Department of Environmental Quality
Via email

RE: Salmonid Spawning Temperature and Map Rule

Dear Ms. Wilson:

Thank you for the opportunity to comment on the Water Quality Standards Triennial Review. As Potlatch stated in our June 26 letter on the Review, we have significant concerns with the Salmonid Spawning Use Designation proposal. While we support the simplified temperature standard, we do not support adding a map to the rules. If these two changes must happen together, we strongly encourage DEQ to stay with the existing temperature standard.

Based on the DEQ statement in the latest draft of the Review we understand our substantive comments on the proposal will not be addressed as part of the Review:

“The purpose of the triennial review is to identify and prioritize issues that need to be addressed, but not to provide specific remedies to the issues discussed. Specific remedies are properly addressed in negotiated rulemaking.”

Regarding the identification and prioritization of issues, we respectfully propose that the Salmonid Spawning rule be moved to the 2020 list. Our request is based on the substantial implications of including a map in the rules, which were referenced in our June 26, 2017 letter. We believe DEQ should allow the extra time to engage with stakeholders well in advance of negotiated rule making. It is clear that DEQ has expended substantial time and money in development of the Issue Paper and supporting documents. Any further development of supporting materials or analysis should only proceed with broad stakeholder involvement, especially with DEQs sister agencies of IDL and IFG, and resource managers such as Potlatch who have extensive knowledge and experience in mapping streams and fish use. Please consider this letter as a formal offer by Potlatch to volunteer for any further developmental efforts.

We appreciate the opportunity to have input on the triennial review and rulemaking.

Respectfully,

Kit Hart
Director, Forest Analytics and Environment
Potlatch Corporation