



Association of Idaho Cities
3100 South Vista, Suite 201, Boise, Idaho 83705
Telephone (208) 344-8594
Fax (208) 344-8677
www.idahocities.org

September 30, 2020

Ms. Paula Wilson, Administrative Rules Coordinator
Idaho Department of Environmental Quality
1410 N Hilton
Boise, ID 83706

Re: September 1, 2020 Published Idaho Administrative Bulletin, Docket No. 58-0102-2001 - AIC
Comments of Support

Dear Ms. Wilson/Paula,

The Association of Idaho Cities (AIC) serves to advance the interests of the cities of Idaho through legislative advocacy, technical assistance, training, and research. Idaho cities play important roles as primary implementers of the Clean Water Act, representing over 70% of all Idaho residents. These stakeholders have a significant interest in the development of water quality standards, rules, and guidance related to the protection of human and aquatic life. AIC is actively engaged in water quality issues through the work of our Environment Committee, Municipal Water Users Group, and our IPDES Task Force.

The Idaho Department of Environmental Quality (DEQ) conducted negotiated rulemaking to (1) revise water quality standards based on stakeholder comments and concerns regarding the implementation of the bacteria criteria, and (2) delete obsolete rule language.

AIC wishes to express our appreciation for the careful review of stakeholder concerns regarding the 2018 proposed criteria update, and the subsequent published update as published in the September 1, 2020 Idaho Administrative Bulletin. AIC supports the criteria language that addresses the implementation of the statistical threshold value, the extended averaging period used in calculating geometric mean values, and the recommendation values for public swimming beaches.

Should you have questions concerning our recommendations and comments, please feel free to contact me.

Sincerely yours,

Johanna M. Bell, PE
AIC Policy Analyst – Environment

cc: Kelley Packer, AIC Executive Director
Tom Jenkins, AIC President
AIC Environment Committee
Municipal Water Users
IPDES Task Force