



Association of Idaho Cities
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March 1, 2021

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

Re: Docket No. 58-0102-1801 Update to Human Health Criteria for Arsenic – 12/16/2020
Stakeholder Meeting

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 and municipal drinking water utilities play important roles as primary providers of drinking water and implementers of the Clean Water Act. Idaho cities represent over 70% of all Idaho residents. These stakeholders have significant interests in the development of water quality standards, rules, and guidance related to the protection of human and aquatic life.

AIC appreciates the presentation and preliminary draft rule by IDEQ staff at the December 16, 2020 stakeholder meeting. AIC supports the preliminary proposal and understands that implementation guidance and other justifications will likely be necessary to secure the US EPA's approval. AIC wishes to be involved in the development of the implementation guidance or further justifications. In support of these efforts, we are attaching a few example guidance documents developed by the US EPA and others, for IDEQ staff and management's files.

AIC appreciates the opportunity to participate in the update to Idaho's human health criteria for arsenic and looks forward to working with our State and partners in the development of these and other water quality standards.

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

Sincerely,

Johanna Bell, Policy Analyst

cc: Kelley Packer, AIC Executive Director
Tom Jenkins, AIC President
AIC IPDES Task Force

Attachments