



Association of Idaho Cities
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May 12, 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 – 04/22/2021
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 play important roles as primary providers of drinking water and implementers of the Clean Water Act. Representing over 70% of all Idaho residents, our members have significant interests in the development of water quality standards, rules, and guidance related to the protection of human and aquatic life.

As noted in previous comment letters, AIC supports the draft criteria that IDEQ has developed - namely the fish tissue criterion for waters that support fishing uses but are not used for drinking water supply (fish only) and the narrative criteria for waters that are used for both fishing and drinking water supplies (fish plus water).

During the April 22, 2021 rule-making meeting IDEQ reiterated that these were still the proposed criteria and requested stakeholder comments on which elements of implementation should potentially be included in the rule versus guidance.

AIC continues to support the IDEQ proposed criteria. AIC also believes that implementing guidance will be needed and that further details for both guidance and rules need to be thoroughly discussed during additional stakeholder meetings. That is, AIC strongly believes that the rule and guidance should be developed concurrently.

AIC appreciates the opportunity to participate in the update to Idaho's human health criteria for arsenic and looks forward to participating in, and providing input to, this important process. Should you have questions concerning our comments, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Bell".

Johanna Bell, Policy Analyst

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