

May 20, 2024

Dr. Mary Anne Nelson
Administrator, Surface and Wastewater Division
Department of Environmental Quality
1410 N. Hilton Street
Boise, ID 83706

Dear Dr. Nelson:

The Department of Environmental Quality (Department) has a rulemaking underway (Docket No. 58-0114-2401) to establish fees for the wastewater re-use permitting program. This rulemaking is of direct interest to the Idaho Association of Commerce & Industry (IACI). IACI is the largest business and industrial trade association in Idaho, representing both small and large companies engaged in all of Idaho's major economic sectors (agricultural, manufacturing, timber, wood products, mining, etc.). Many of IACI's members have wastewater re-use permits. Thus, this rulemaking is of direct interest to our organization.

The Department published a white paper earlier in May describing the need for these fees and three possible fee scenarios. The IACI Environmental Committee believes that a fixed annual cost methodology would be the most appropriate mechanism to provide the revenue needed by the Department. The annual fee structure presented in the white paper, which reflected the size and type of permittee, provides a fair distribution of these fees across the regulated community.

We appreciate the opportunity to provide these comments.

Sincerely,



Alex LaBeau
President