



## HILTY, BOWER, HAWS & SEABLE, PLLC

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March 19, 2025

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1410 North Hilton Street  
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*Via Email*

*Re: Comments – Negotiated Rulemaking Meeting March 12, 2025*

To Matthew Beeter, Amanda Henderson, and the Idaho Department of Environmental Quality:

This firm, Hilty, Bower, Haws & Seable, PLLC, represents the City of Caldwell in connection with this negotiated rulemaking process. I am writing to provide written comments concerning the meeting held on March 12, 2025, via Teams and in person, concerning the draft rule governing solid waste.

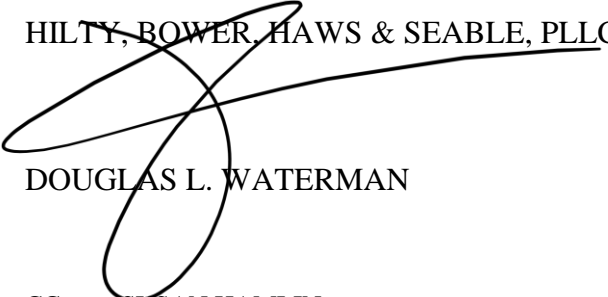
As of the present time, it appears that IDEQ has determined not to attempt to regulate street sweepings. While the original scoping meeting discussed the regulation of street sweepings, provisions specific to that issue have not been included in the most recent proposed draft rules. The City of Caldwell appreciates that IDEQ is no longer contemplating attempting to treat street sweepings as solid waste, *per se*, or attempting to regulate solid waste based upon a “constituent parts” test, rather than a “disposal/discard” test.

The City of Caldwell has no further comments upon the proposed rules beyond this specific issue and thanks IDEQ for their time and attention on this matter.

Please reach out if you have any questions or concerns.

Very truly yours,

~~HILTY, BOWER, HAWS & SEABLE, PLLC~~

  
DOUGLAS L. WATERMAN

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