



October 4, 2018

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

Subject: City of Nampa Comment for Docket No. 58-0102-1802 Revision of Recreational Use and Criteria; Adoption of Aquatic Life Criteria for Three Toxics

Dear Ms. Wilson:

The City of Nampa (City) is concerned about the Department of Environmental Quality (DEQ's) proposed revisions of recreational uses and criteria, specifically the consolidation of primary and secondary contact recreation beneficial uses. The DEQ's suggestion that there "appears to be no value in maintaining a distinction between primary and secondary contact recreation" is inconsistent with the City's position. The Nampa Wastewater Treatment Plant (WWTP) is impacted by the designated beneficial uses and subsequent criteria that are enforced. A secondary contact recreation designation is in place for Indian Creek, which the Nampa WWTP discharges to under its National Pollutant Discharge Elimination System (NPDES) permit. Indian Creek is a small, intermittent waterbody with low-exposure risk to the community; the secondary contact recreation designation is the most appropriate recreational criteria. A shift to primary contact recreation would result in increasingly stringent limits and additional expenditures that are not necessary to protect public uses for waterbodies like Indian Creek. The implications of these listings to municipal WWTP's and the communities they serve is significant.

The City believes that maintaining a primary and secondary contact recreational use is an approach that provides practical and realistic water quality protection to waterbodies. Distinguishing between recreational uses is protective of water quality, reasonable for point sources, and facilitates alignment with public uses of waterbodies.

The City appreciates the opportunity to provide comments on this important regulatory process. Feel free to contact me at (208) 468-4493, or via email at runyann@cityofnampa.us if you have questions.

Sincerely,

Nate W. Runyan, P.E.
Deputy Public Works Director

Cc: Tom Points, Public Works Director