



Association of Idaho Cities
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April 21, 2015

Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

filed by email to paula.wilson@deq.idaho.gov

RE: Association of Idaho Cities Comments on Draft Use Attainability Analysis Rulemaking and Meeting

Dear Ms. Wilson,

The Association of Idaho Cities (AIC) was founded in 1947 and is a nonpartisan, nonprofit corporation owned, organized, and operated by Idaho's city governments. The organization serves to advance the interests of the cities of Idaho through legislative advocacy, technical assistance, training and research. AIC is actively engaged in water quality issues through the work of our Environment Committee, chaired by Boise City Councilmember Elaine Clegg.

Idaho cities play an important role as the primary implementers of the Clean Water Act and have a significant interest in the inclusion of Use Attainability Analysis (UAA) procedures and the clarification of manmade waters designation and associated numeric and narrative water quality criterion.

AIC recognizes that water quality standards development is a non-discretionary State activity under the Clean Water Act and is pleased to participate with Idaho Department of Environmental Quality (IDEQ), the Environmental Protection Agency (EPA), tribes, and other stakeholders to develop water quality standards that include UAA procedures and clearly identify manmade waters and associated numeric or narrative criterion that are consistent with the Clean Water Act.

During the meeting, IDEQ requested comments on the proposed rule and if additional meetings on this proposed rule might be necessary. At this time, AIC anticipates that there are additional approaches to the manmade waters designation approach and process that could be useful in more accurately characterizing and protecting manmade waters, including the associated

numeric and narrative criterion for which they should be protected. Therefore, AIC respectfully requests that at least one additional meeting on the rule be scheduled to explore these options.

AIC appreciates the opportunity to comment on draft UAA rulemaking and looks forward to working with our state and federal partners to implement the UAA and manmade waters components of the standards consistent with the Act. Should you have questions concerning our comments, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'S Grigg', written in a cursive style.

Seth Grigg

Executive Director

Cc: Elaine Clegg, AIC Environment Committee Chair