



CORPORATE HEADQUARTERS

May 9, 2015

Sent via email to: paula.wilson@deq.idaho.gov

Paula Wilson
IDEQ State Office
Attorney General's Office
1410 N. Hilton
Boise, ID 83706

Dear Ms. Wilson:

The Department of Environmental Quality (DEQ) is updating the copper criteria for aquatic life use. DEQ has proposed four (4) different options for consideration in this rulemaking. The J.R. Simplot Company (Simplot) supports option number one (1). Option number one allows the use of the Biotic Ligand Model (BLM) with site specific information (as compared to default input values). This enables the determination of a more scientifically robust water quality criterion.

The comments provided by Clearwater Paper, including the document developed by the National Council for Air and Stream Improvement, provide more detail on the benefits from Option number one. Simplot supports those comments.

Sincerely,

Alan L. Prouty
Vice President
Sustainability & Regulatory Affairs