



PUBLIC WORKS DEPARTMENT

MAYOR: David H. Bieter | DIRECTOR: Stephan Burgos

June 29, 2017

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

RE: Idaho Water Quality Standards, Triennial Review comments

Dear Ms. Wilson,

The City of Boise appreciates the opportunity to submit comments regarding the Idaho Department of Environmental Quality's 2017 Triennial Review of Water Quality Standards. As stated in the public meetings, the goal of the triennial review process is to identify priorities for water quality standards rulemaking and influence program development for the next three years. With that in mind, we respectfully submit the following comments:

Ammonia

The adoption of the EPA §304(a) recommendation for ammonia criteria was identified as a high priority item during the triennial review workshops. The City of Boise agrees that updating the ammonia criteria is a high priority.

Before beginning negotiated rulemaking, the City encourages IDEQ to evaluate the presence of Unionidae freshwater mussels throughout the state. If mussels are not present throughout the state, IDEQ is encouraged to consider utilizing the Recalculation Procedure on a site-specific or watershed basis where it can demonstrate that freshwater mussels are not present at a particular site or in a particular watershed.

The City encourages IDEQ to evaluate the options provided in Appendix N of the criteria document to establish state-specific or site specific criteria for acute toxicity that would allow different criteria for streams where mussels would not likely be present.

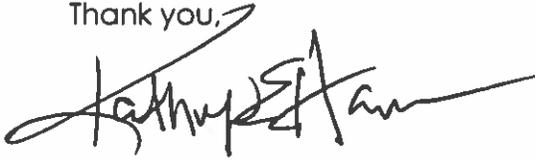
Environmental DNA (eDNA) is rapidly emerging as a promising tool for detection of the presence of target organisms in waterbodies. The City is working with the USGS to build an eDNA database for the Lower Boise River. USGS has confirmed that assays/markers have been developed for Unionidae detection. IDEQ is encouraged to investigate the application of this methodology in Idaho Unionidae surveys.

Man-made waterways

The City of Boise encourages IDEQ to consider additional clarification of man-made waterways and the expectations for their quality. The City supports the creation of a man-made waters beneficial use category. The new category, specific to man-made waters, would provide a more appropriate designated beneficial use for these water bodies.

The City of Boise is looking forward to participating in upcoming Negotiated Rulemaking meetings and working cooperatively with IDEQ on these important issues.

Thank you,

A handwritten signature in black ink, appearing to read "Kate Harris for Robbin Finch". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kate Harris for Robbin Finch, Water Quality Manager

