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GWD Members:

Aberdeen - American Falls GWD
Bingham GWD
Bonneville - Jefferson GWD
Carey GWD
Henry's Fork GWD
Jefferson - Clark GWD
Madison GWD
Magic Valley GWD
North Snake GWD
Southwest Irrigation District

City Members:

City of American Falls
City of Blackfoot
City of Chubbuck
City of Heyburn
City of Jerome
City of Rupert

Business Members:

Anheuser-Busch Agricultural
Glanbia Cheese
Suez North America

Ms. Paula Wilson, Administrative Rules Coordinator
Idaho Department of Environmental Quality (IDEQ)
1410 N Hilton Boise, ID 83706
June 24, 2020

Re: Docket No. 58-0102-2001, AIC Comments per June 11, 2020 Stakeholder Meeting

Idaho Groundwater Appropriators, Inc. (IGWA) represents 10 ground water and irrigation districts along with eight cities and three agribusiness which are currently irrigating over one million acres using ground water from the Eastern Snake Plain Aquifer and its tributaries.

Instead of submitting similar comments as Association of Idaho Cities (AIC), IGWA is supporting these comments from AIC.

“AIC suggests that the best path forward is for Idaho to adopt a “swimming standard” for recreation advisories and public beach closures by the Idaho health districts (i.e., utilizing a STV); and a “recreational use standard” for beneficial use support determinations that are based on a 90-day averaging period, coupled with minimum data requirements (i.e., 5 to 10 samples), so that the STV or geomean may be applied with “equal weight,” while not impacting the accuracy of the Idaho beneficial use support determinations.”

“AIC recommends this approach to reduce confusion for the public and reduce the risk of mis-applying “advisory” thresholds as “enforcement criteria.” It also helps clarify to the public that a “fully supported use” designation does not mean that

ingestion of raw water from a surface water body is not without ANY risk to safety or health – a fundamentally wrong assumption due to nonanthropogenic risks from water-borne disease and bacteria concentrations throughout Idaho.”

I appreciate AIC’s comments and overview because it has been a failing of IDEQ to address these issues which have been a large concern among many entities that deal with water issues in Idaho. It is our hope that IDEQ will take these comments from AIC and implement these recommendations and you will see support from many sectors of the water community.

Sincerely yours,

Lynn Tominaga, Executive Director