

Michelle Dale

From: Paul Arrington <paul@iwua.org>
Sent: Tuesday, June 30, 2020 3:18 PM
To: Michelle Dale
Cc: Paul Arrington; Dan Steenson
Subject: WQS Triennial Review: development of performance-based temperature criteria
Attachments: 2020-02-28 Request for OPE Study.pdf; issue-paper-performance-based-approach-for-temperature-criteria.pdf

Dear Michelle:

Thank you for the opportunity to provide comments on IDEQ's Triennial Review process. I write on behalf of the Idaho Water Users Association (IWUA) to express our support for the investigation and potential development of performance-based temperature criteria. I would also urge IDEQ to consider other regulatory and non-regulatory alternatives available to IDEQ and Idaho communities to address challenges associated with establishing, administering and attaining appropriate temperature criteria for Idaho waterbodies.

IWUA supported the attached request to the Joint Legislative Oversight Committee (JLOC) by House and Senate leaders last legislative session to investigate these issues. Unfortunately, due to the high volume of requests last session, the request was not chosen for study by the Office of Performance Evaluations. IWUA views IDEQ's current proposal as responsive to the concerns which led House and Senate leaders to submit the attached request. In fact, during the hearing, JLOC questioned whether IDEQ is investigating these issues.

Thanks for the opportunity to comment. IWUA stands ready to participate and assist in this process.

Paul

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