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October 2, 2015

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

Submitted via email: paula.wilson@deq.idaho.gov

Re: Docket NO. 58-0125-1401 Rules regulating the Idaho pollutant discharge elimination system program

Dear Ms. Wilson,

Idaho Rivers United appreciates the opportunity to provide comment on the proposed rule. Idaho Rivers United (IRU) is a statewide organization dedicated to the protection of Idaho's rivers and native fisheries. Since 1990, IRU has worked to prevent the pollution and dewatering of Idaho's rivers and the extinction of Idaho's native fish. IRU has participated in implementation of the Clean Water Act in Idaho including National Pollution Discharge Elimination System permits issued by the Environmental Protection Agency. Our members use and enjoy Idaho's rivers and have a large stake in the outcome of this rulemaking.

These rules must meet the requirements of the Clean Water Act and other federal regulations regarding water quality and resource protection.

Section 500 Enforcement – In order to protect Idaho's rivers and waterways, to encourage compliance with IDPES permits and ensure Idaho not become the place where it's cheap to pollute, Idaho should adopt rules that provide for IPDES penalties equal to or more stringent than those allowed under federal rules. The Idaho rule limits penalties from some violations at less than one third of the federal limit.

Penalties need to be very stiff in order to encourage full compliance with permit limits 24/7/365. Once pollution enters a waterway the damage is done. The fish and insects that live in the river can't evacuate. Rivers can't be razed and rebuilt. Hazmat teams arriving hours after a spill are powerless to capture the pollution. It's impossible to clean up an e coli exceedance or a discharge of sediment.

Most violations are preventable with proper operations and maintenance and with the right attitude. Idaho should impose stiff penalties on IPDES violators to make it clear that, in Idaho, water pollution will not be tolerated.

Sincerely,

Liz Paul
Boise River Campaign Coordinator