



Neal S. Oldemeyer, P.E.
Director

Boise City Hall
150 N. Capitol Boulevard

Mailing Address
P. O. Box 500
Boise, Idaho 83701-0500

Phone
208/384-3900

Fax
208/433-5650

TDD/TTY
800/377-3529

Web
www.cityofboise.org

Mayor
David H. Bieter

City Council
President
Maryanne Jordan

Council Pro Tem
David Eberle

Elaine Clegg
Lauren McLean
Ben Quintana
TJ Thomson

Public Works

May 9, 2016

Jason Pappani
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

RE: City of Boise's comments on Idaho's Preliminary Draft Rule, Docket No. 58-0102-1502,
Updating Idaho's Freshwater Aquatic Life Criteria for Copper

Dear Jason:

The City of Boise appreciates the opportunity to provide comments to the Idaho Department of Environmental Quality (IDEQ) on the Update to Copper Criteria for Aquatic Life Use, 4/20/16 meeting.

IDEQ asked for input on the options presented during the 4/20/16 meeting. The City of Boise is supportive of Option 4 – monitoring to develop default criteria.

The City of Boise supports using site-specific data to determine Biotic Ligand Model (BLM) criteria. We would encourage IDEQ to consider monitoring and reporting requirements before effluent limits are established. If limits are necessary, however, we support the development of default BLM input criteria more specific to Idaho than the (draft) EPA ecoregional criteria. The City has compared BLM model runs using actual, local data to simulations with the draft EPA ecoregional default criteria for missing parameters. The EPA ecoregional criteria were extremely conservative and do not appear to be representative of actual conditions. Similarly, the City supports the collection of additional data to develop Idaho default criteria even though it may delay the date of the final rule adoption.

In addition, The City of Boise supports the adoption of the 2007 EPA document that references the BLM model without specifying the version number so the most recent version of the BLM may be used.

Thank you again for the opportunity to participate in this process. We look forward to the June 2, 2016 meeting. If you have any questions, please contact me at (208) 395-7877.

Sincerely,

Kate Harris