



Association of Idaho Cities
3100 South Vista, Suite 310, Boise, Idaho 83705
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www.idahocities.org

August 8, 2016

Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83705

RE: AIC Comments on IDEQ Rule Making for BLM Copper Criteria

Dear Ms. Wilson:

The Association of Idaho Cities (AIC) was founded in 1947 and is a nonpartisan, nonprofit corporation owned, organized, and operated by Idaho's city governments. The organization serves to advance the interests of the cities of Idaho through legislative advocacy, technical assistance, training and research. AIC is actively engaged in water quality issues through the work of our Environment Committee, chaired by Boise City Councilmember Elaine Clegg.

Idaho cities play an important role as the primary implementers of the Clean Water Act and have a significant interest in the development of rules and guidance related to copper criteria and the Biotic Ligand Model.

IDEQ requested input concerning copper criteria in the proposed model. AIC's comments are included as an attachment to this letter.

AIC appreciates the opportunity to comment on the development of the Biotic Ligand Model and looks forward to working with our state partners in the development of this important resource for city officials. Should you have questions concerning our comments, please feel free to contact me.

Sincerely,



Seth Grigg

Executive Director

Cc: Elaine Clegg, AIC Environment Committee Chair; Tom Dupuis, AIC Environmental Consultant



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AIC Comments on Biotic Ligand Model Copper Criteria

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How IDEQ implements the Biotic Ligand Model (BLM) will be of critical importance for Idaho municipalities because copper is ubiquitous in wastewater and stormwater. At the July 26th meeting IDEQ went through an annotated outline of the guidance. On page 2 of the outline there is an example of how water quality based effluent limits (WQBELs) would be calculated using the BLM. Although it states that the 10th percentile of the instantaneous criteria will be used for permitting, IDEQ's intent as stated at the meeting and in their PowerPoint presentation is to use the 15th percentile based on the approach to WQBELs currently being used in Alaska. It is AIC's understanding that IDEQ will be developing Idaho specific WQBELs guidance concurrent with the BLM guidance. AIC recommends that this kind of implementation decision on the BLM should be consistent with Idaho's WQBELs guidance rather than default to an Alaska approach at this early stage of development.