



Association of Idaho Cities
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May 5, 2017

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

Re: Public Comment Period on Draft Implementation Guidance for the Idaho Copper Criteria for Aquatic Life: Using the Biotic Ligand Model

Dear Ms. Wilson/Paula,

The Association of Idaho Cities (AIC) serves to advance the interests of the cities of Idaho through legislative advocacy, technical assistance, training, and research. 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 Clean Water Act compliance and implementation policies. AIC is actively engaged in water quality issues through the work of our Environment Committee, chaired by Boise City Councilmember Elaine Clegg.

The Idaho Department of Environmental Quality (DEQ) has initiated a rulemaking to update DEQ's existing hardness dependent criteria by using EPA's 2007 304(a) copper criteria. AIC anticipates the guidance under development will provide guidelines for calculating copper criteria for aquatic life for Idaho dischargers using the biotic ligand model (BLM).

AIC has only one comment at this time. AIC requests the guidance address copper and dissolved organic carbon (DOC) filtration in the lab. AIC believes that this manner of data collection, which is understood to be the same manner of data collection used by DEQ, would be especially useful for smaller cities that don't have the staff capabilities and equipment resources that larger cities have.

AIC appreciates the opportunity to comment on the development of the State guidance looks forward to working with our state and other partners in the development of these important resources for city officials. Should you have questions concerning our attached comments, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Grigg".

Seth Grigg

Executive Director

cc: Elaine Clegg, AIC Environment Committee Chair
Johanna Bell, AIC Policy Analyst
Tom Dupuis, AIC Environmental Consultant