



Association of Idaho Cities
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April 29, 2020

Ms. Paula Wilson, Administrative Rules Coordinator
Idaho Department of Environmental Quality
1410 N Hilton
Boise, ID 83706

Re: Docket No. 58-0125-2001 Idaho Pollutant Discharge Elimination System Program:
Negotiated Rulemaking - 4/14/2020 Stakeholder Meeting

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 and municipal drinking water utilities play important roles as primary providers of drinking water and implementers of the Clean Water Act. Idaho cities represent over 70% of all Idaho residents. These stakeholders have significant interests in the development of water quality standards, rules, and guidance related to the protection of human and aquatic life.

The Idaho Department of Environmental Quality (IDEQ) is seeking public comment on a draft justification and recommendations for changing parts of IDAPA 58.01.25 to comply with recent changes to the Code of Federal Regulations regarding the National Pollutant Discharge Elimination System (NPDES) Program and to address other rule issues encountered.

AIC supports the proposed changes of IDAPA 58.01.25 and appreciates IDEQ staff efforts to improve and update rules pertinent to the IPDES permitting program. AIC and our members understand the advantages Clean Water Act discharge permit program delegation to Idaho including (1) access to regulators and technical compliance assistance, (2) increased competency of state regulators and technical compliance assistance, and (3) access to and improved coordination of state and federal financial and technical resources for facility planning and capital improvements.

Should you have questions concerning our support, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Johanna Bell".

Johanna Bell, Policy Analyst

cc: Susan Hawkins, AIC President
Kelley Packer, AIC Executive Director
Elaine Clegg, AIC Environment Committee Chair
AIC Municipal Water Users & IPDES Task Force