



Association of Idaho Cities
3100 South Vista, Suite 210, Boise, Idaho 83705
Telephone (208) 344-8594
Fax (208) 344-8677
www.idahocities.org

February 15, 2017

Troy Smith, IPDES Rules Coordinator
Idaho Department of Environmental Quality
1410 N Hilton
Boise, ID 83705

Re: IPDES Effluent Limit Development Guidance (ELDG) – Invited Workgroup Content

Dear Mr. Smith/Troy,

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. 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 IPDES rules and guidance. 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 (IDEQ) is developing a program to address water pollution by regulating point sources that discharge pollutants to waters of the United States. During the months of December 2016 and January 2017 the IDEQ presented the opportunity for a workgroup to proactively address effluent limit issues unique to certain parameters, and to propose preliminary guidance for development of water quality based permit conditions. The IDEQ-invited workgroup's content pertaining to toxics and temperature is included as an attachment to this letter. Please expect the workgroup's content pertaining to nutrients prior to close of business this Friday, February 17th.

AIC appreciates the opportunity to provide the workgroup's content for the IPDES program and looks forward to working with our state and other 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

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