

June 30, 2020

**Submitted Via Email to [michelle.dale@deq.idaho.gov](mailto:michelle.dale@deq.idaho.gov)**

Michelle Dale  
Idaho Department of Environmental Quality  
1410 N. Hilton Rd.  
Boise, ID 83706

Re: Performance-based Approach for Temperature Criteria

Dear Ms. Dale:

Thank you for the opportunity to comment on the Idaho Department of Environmental Quality's (DEQ) Clean Water Act Section 303 water quality standards triennial review. As noted in the issue paper published by DEQ, and referenced in the public meeting, DEQ is considering a performance-based approach for temperature criteria. Specifically, DEQ is requesting comments on whether to prioritize development of a performance-based temperature criteria.

Idaho Power Company (IPC) is an investor-owned utility that serves approximately 570,000 customers in a service area covering southern Idaho and eastern Oregon that spans 24,000 square miles. IPC has extensive experience working within the current temperature criteria and processes, including supporting development of a temperature Total Maximum Daily Load for the Hells Canyon Complex, and site-specific numeric criteria for temperature in the Snake River downstream from Hells Canyon Dam to the confluence with the Salmon River. Based on this experience, IPC believes that developing performance-based temperature criteria would provide a way to constructively move forward with achievable and attainable temperature standards.

A performance-based approach for temperature criteria is a cost-effective solution to achieving desired environmental outcomes, while giving industry flexibility and encouraging innovation. Most importantly, it tailors standards to specific watersheds and ecosystems, while streamlining administrative processes.

Idaho Power supports the development of a water quality standard that is a specific process and methodology, leading to and describing implementation of a numeric water quality criterion. If DEQ decides to initiate a rulemaking based on this triennial review, IPC will participate in the rulemaking. Thank you again for the opportunity to provide these comments. If you have any

June 30, 2020

Page 2

questions about the content of this letter, please contact me at [rmyers@idahopower.com](mailto:rmyers@idahopower.com) or via telephone at (208)388-2358.

Sincerely,

A handwritten signature in blue ink that reads "Ralph Myers". The signature is written in a cursive style.

**Ralph Myers**

ENVIRONMENTAL MANAGER

Idaho Power Company

PO Box 70 | 1221 W. Idaho St., Boise, ID 83707 | 83702

Work 208-388-2358

Cell 208-559-2573

Email [rmyers@idahopower.com](mailto:rmyers@idahopower.com)