



Association of Idaho Cities
3100 South Vista, Suite 310, Boise, Idaho 83705
Telephone (208) 344-8594
Fax (208) 344-8677
www.idahocities.org

January 20, 2016

Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

(filed by email to paula.wilson@deq.idaho.gov)

RE: Association of Idaho Cities Comments on Update to Copper Aquatic Life Criterion Docket No. 58-0102-1502

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 update and implementation of the copper criterion for aquatic life.

IDEQ requested input concerning use of the 2007 Biotic Ligand Model (BLM) or the Multiple Linear Regression (MLR) equation for the copper criterion update. AIC recommends use of the EPA approved 2007 BLM for the copper criterion update. Concerning implementation of the criterion, AIC recognizes that additional collection of water quality data is necessary to use BLM. We support the collection of appropriate data from effluents and receiving stream to properly implement BLM.

AIC appreciates the opportunity to comment on this important water quality standards decision and looks forward to working with our state and federal partners to update the copper aquatic life criteria to better protect aquatic life and the environment. 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