



October 4, 2018

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

Subject: City of Nampa Comment for Docket No. 58-0102-1803 – Rulemaking “Insignificant Additions of Heat”

Dear Ms. Wilson:

The City of Nampa (City) would like to express its support for the proposed rulemaking to allow de minimus additions of heat in waterbodies that exceed applicable temperature criteria (Docket No. 58-0102-1803). The City believes that this approach provides practical and realistic water quality protection to waterbodies. The Nampa Wastewater Treatment Plant (WWTP) discharges to Indian Creek, whose background temperatures have been shown to exceed Idaho’s numeric temperature criteria set for the protection of aquatic life for specific times during the year. Indian Creek is a complex, intermittent waterbody with multiple input sources. This rulemaking would continue to limit the City’s anthropogenic thermal loadings yet allow for heat loading of no more than a de minimus 0.3 degrees Celsius increase in Indian Creek temperatures. This allowance is protective of water quality, reasonable for point sources, and allows for other innovative approaches to be considered for temperature mitigation.

The City appreciates the opportunity to provide comments on this important regulatory process. Feel free to contact me at (208) 468-4493, or via email at runyann@cityofnampa.us if you have questions.

Sincerely,

Nate W. Runyan, P.E.
Deputy Public Works Director

Cc: Tom Points, Public Works Director