



Association of Idaho Cities
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May 26, 2021

Sean Costello, DAG
IDWR Rules Review Officer
322 E. Front Street
PO Box 83720
Boise, ID 83720-0098

Re: AIC Comments on the May 12, 2021 IDWR Procedural Rulemaking Preliminary DRAFT Rule Text

Dear Mr. Costello,

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 numerous irrigation services. Idaho cities represent over 70% of all Idaho residents. These stakeholders have significant interests in the development of water quantity rules related to the beneficial uses supported through responsible management of Idaho's water resources.

The Idaho Department of Water Resources (IDWR) is seeking public comment on draft Procedural Rules revisions pursuant to Executive Order No. 2020-01 "Zero-Based Regulation."

AIC is providing comments on Rules 54, 100, 201, 210, 220, 300, 414 and is proposing an additional rule 418. These comments and suggested changes are included via interlineation in the text of the proposed rules sent to the parties by the Department after the May 12, 2021 meeting (attached).

AIC appreciates the opportunity to provide comments and feedback on the Procedural Rules and looks forward to working with IDWR and partners on these and other water quantity management issues. Should you have questions concerning our attached comments, please feel free to contact us.

Sincerely,

Johanna M. Bell, AIC Policy Analyst

Candice McHugh, McHugh Bromley Attorneys at Law, PLLC

cc: Tom Jenkins, AIC President
Kelley Packer, AIC Executive Director

Attachment