



**Association of Idaho Cities**  
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June 29, 2021

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

Re: AIC Comments on the June 23, 2021, IDWR Procedural Rulemaking Pre-Final 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 provided comments on Rules 54, 100, 201, 210, 220, 300, 414 and an additional rule 418. These comments and suggested changes were responded to by IDWR, which provided an updated pre-final rule language for the June 23, 2021 stakeholder meeting.

AIC appreciates the opportunity to provide comments and feedback on the Procedural Rules. AIC requests that IDWR notify us and the other stakeholders if any further, substantive changes are made to the current pre-final draft language following the July 7<sup>th</sup> comment deadline and prior to the July 30<sup>th</sup> submittal to the Division of Financial Management.

AIC looks forward to working with IDWR and partners on these and other water quantity management issues. Should you have questions concerning our follow up request, please feel free to contact us.

Sincerely,

Johanna M. Bell, AIC Policy Analyst

Candice McHugh, McHugh Bromley Attorneys at Law, PLLC

cc: Kevin England, AIC President  
Kelley Packer, AIC Executive Director