



www.idahoconservation.org

Idaho Conservation League

PO Box 844, Boise, ID 83701
208.345.6933

July 1, 2015

Paula Wilson
DEQ State Office
Attorney General's Office
1410 N. Hilton
Boise, ID 83706

Submitted via email: paula.wilson@deq.idaho.gov

Re: Docket No. 58-0111-1501- Temporary and Proposed Rule re Ground Water Quality

Dear Ms. Wilson;

Since 1973, the Idaho Conservation League (ICL) has been Idaho's voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's ground water quality.

We have reviewed the Temporary and Proposed Rule language that DEQ has provided.

ICL participated extensively in the initial rulemaking in 2007 that created the mining related points of compliance framework in DEQ's rules. As we review the proposed edits, we believe that they are consistent with the intent that was expressed at prior rulemakings on this subject. That said, the new edits are not a pillar of clarity.

The current proposed language fails to make clear that degradation and exceedance of ground water quality standards can occur between the mine and the point of compliance. But that the ground water quality standards must be achieved (and current and future beneficial uses protected) from the point of compliance onward.

DEQ should more plainly state this to avoid any future confusion.

ICL Comments Re: Docket No. 58-0111-1501- Temporary and Proposed Rule re Ground Water Quality

Please contact me if you have any questions at 208-345-6933 x 24 or jhayes@idahoconservation.org

Sincerely,



Justin Hayes
Program Director