

**From:** [Jonathan Oppenheimer](#)  
**To:** [Eric Wilson](#); [Rule Making](#)  
**Cc:** [Benjamin Davenport](#); [Austin Walkins](#)  
**Subject:** Idaho Conservation League comments on IDL Docket 20-0302-1901  
**Date:** Saturday, June 29, 2019 12:17:21 PM  
**Attachments:** [ICL cmnts #2 re Temporary Mine Bonding Rules-6-29-19.pdf](#)

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Dear Eric and IDL-

Please find comments attached and paste below.

Thanks,

jonathan

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Idaho Department of Lands

Attn: Eric Wilson - Rulemaking

300 N. 6th St., Suite 103

Boise, ID 83702

June 29, 2019

Submitted via email: [rulemaking@idl.idaho.gov](mailto:rulemaking@idl.idaho.gov)

**RE: Idaho Conservation League's comments following June 27<sup>th</sup>, 2019 rulemaking meeting on Temporary Rules Governing Exploration, Surface Mining, and Closure of Cyanidation Facilities – IDAPA 20.03.02; Docket No. 20-0302-1901**

Dear Mr. Wilson:

Thank you for the opportunity to provide comments on the Idaho Department of Land's (IDL or "the Department") Temporary Rules Governing Exploration, Surface Mining, and Closure of Cyanidation Facilities – IDAPA 20.03.02. These comments are being submitted in response to discussions that occurred at the June 27<sup>th</sup> rulemaking meeting over the requirements to provide information on water quality impacts and mitigation at mine sites.

Since 1973, the Idaho Conservation League has been Idaho's leading 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 30,000 supporters, many of whom are interested in ensuring that mines in Idaho are adequately regulated so as to ensure the protection of Idaho's water quality, public health, and aquatic species.

Pursuant to the changes implemented by House Bill 14, Idaho Code 47-1506(a)(1)(vii) requires any operator desiring to conduct mining operations in Idaho to submit, amongst other things, the following:

*“A description of foreseeable water quality impacts from mining operations and proposed water management activities to comply with water quality requirements.”*

To comply with these statutory requirements, the Department has proposed language at IDAPA 20.03.02.070.04.c-d that requires mine operators to submit information related to potential water quality impacts and management plans. Providing this information to the Department is necessary to not only protect water quality but also accurately calculate the financial assurances needed for the mine operation and reclamation. In light of this, we strongly support the inclusion of the proposed language found at IDAPA 20.03.02.070.04.c-d.

Please contact me at 208-345-6933 ext. 23 or [awalkins@idahoconservation.org](mailto:awalkins@idahoconservation.org) if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,

Austin Walkins

Senior Conservation Associate

Jonathan Oppenheimer

External Relations Director

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**Jonathan Oppenheimer**  
External Relations Director

Idaho Conservation League

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*RE: Idaho Conservation League's comments on Draft #2 Temporary Rules Governing Exploration, Surface Mining, and Closure of Cyanidation Facilities – IDAPA 20.03.02; Docket No. 20-0302-1901*

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