

March 19, 2025

**Via Email Only**

Idaho Department of Environmental Quality  
Attn: Amanda Henderson  
1410 N. Hilton St.  
Boise, ID 83706  
[amanda.henderson@deq.idaho.gov](mailto:amanda.henderson@deq.idaho.gov)

RE: The L&R Group, LLC – Public Comment  
Negotiated Rule Draft No. 1  
Docket No. 58-0106-2501

Dear Ms. Henderson,

On behalf of The L&R Group, LLC, I respectfully submit this comment regarding Negotiated Rule Draft No. 1, Docket No. 58-0106-2501, concerning the Idaho Department of Environmental Quality's ("DEQ" or the "Department") proposed changes to Idaho's Solid Waste Management Rules ("SWMR"). The DEQ has proposed changes which replace "shall" with "will" for various responsibilities listed in the SWMR (e.g. IDAPA 58.01.06.032.03.a, IDAPA 58.01.06.032.03.c, IDAPA 58.01.06.032.03.d, etc.). Pursuant to this change, I kindly ask that you respond to the question below:

1. Is the DEQ's intent in proposing the change from "shall" to "will" to modify or reduce its own responsibilities in any way? If yes, how so?

Sincerely,

THE L&R GROUP, LLC

Amanda Dempsey  
Corporate Counsel  
[amanda@tlr.group](mailto:amanda@tlr.group)