



IDAHO MINING ASSOCIATION

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July 31, 2018

Paula Wilson
DEQ State Office
1410 N. Hilton
Boise, ID 83706

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

Re: Docket No. 58-0102-1801, Water Quality/Arsenic

Dear Ms. Wilson:

The Idaho Mining Association (IMA) appreciates the opportunity to provide the following comments on the Department of Environmental Quality (DEQ) Rulemaking regarding the arsenic human health water quality criteria. Similar to other water quality criteria, arsenic criteria standards have a direct impact on many IMA members, specifically those with discharge permits or mining operations in areas of the state where natural background levels of arsenic are already elevated.

Since 1903, IMA has represented miners and mining companies engaged in mineral exploration, mineral developments, and land reclamation throughout the state of Idaho. Our membership also consists of companies and industries that provide services to the mining industry within the state. IMA and its members are committed to responsible and sustainable mineral withdrawal in Idaho and our member companies continue to utilize and explore more innovative and science backed methods to extract minerals needed for everyday life while protecting and preserving the environment in Idaho for future generations.

We were pleased to see the timeline for establishing an Idaho criteria extended. We believe this will give the DEQ the additional time necessary to collect data and use the best scientific

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standards available to create an appropriate criteria for Idaho specific waters while recognizing the naturally occurring arsenic in surface and groundwater around the state.

IMA has reviewed and supports the recommendations for additional action that were submitted by the Idaho Association of Commerce and Industry. We are committed to helping the DEQ in reaching the goal of a new standard within the new timeline provided.

Again, we appreciate the opportunity to comment and as rulemaking progresses this fall, we look forward to participating in the discussion to create a realistic standard for Idaho.

Kindest Regards,

A handwritten signature in blue ink, appearing to read 'BJD', with a large, sweeping flourish above the letters.

Benjamin J. Davenport,
Executive V.P.,
Idaho Mining Association