



Sent via email to: paula.wilson@deq.idaho.gov

Department of Environmental Quality
1410 N. Hilton, Boise, ID 83706

RE: Ore Processing by Cyanidation (Docket No. 58-0113-1901)

To whom it may concern,

Please accept the following comments on behalf of Trout Unlimited (TU) for the Idaho Department of Environmental Qualities (DEQ) effort to promulgate rules regarding Ore Processing by Cyanidation (Docket No. 58-0113-1901).

Trout Unlimited is a private non-profit national conservation organization that has more than 300,000 members and supporters nationwide dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU has dedicated staff and volunteers working toward the protection of sensitive ecological systems necessary to support robust native and wild trout and salmon populations in their respective ranges.

In Idaho, TU has over 2,000 members and 9 state chapters who enjoy the world-class fishing this state has to offer. As DEQ is keenly aware, trout and salmon need cold, clean water to survive and perpetuate. We hope that DEQ approaches this update to cyanidation rules with the utmost caution.

In the May 31st meeting, there was discussion of the challenges of finding peer reviewed science on design criteria because of variable geology and design criteria at different facilities. It is, however, paramount that stringent sideboards be set that protect both ground and surface waters from contamination by cyanide facilities. Once in place, any shortcomings in the design of these facilities is nearly impossible to correct during the life of the project and beyond. With a cyanidation facility proposed at the headwaters of the South Fork Salmon River (an important anadromous fish bearing stream) located in a very remote, high-elevation site, a failure of the system due to shortcomings in design criteria could be catastrophic.

We (TU) ask that DEQ, the Idaho Mining Association and others that support updating these rules provide adequate scientific evidence that any new standards or guidelines adopted in this rule promulgation are, at minimum, equal to or greater than design standards currently in rule.

We appreciate the opportunity to comment on this important effort with the Idaho Department of Environmental Quality.

Sincerely,

A handwritten signature in black ink that reads "Michael T. Gibson". The signature is written in a cursive style with a large, looping initial "M".

Michael Gibson

Trout Unlimited

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